



## **Draft Integrated Implementation Plan 2019-2024**

### **Submission on behalf of DublinTown**

#### **Introduction**

Dublin has sprawled without adequate design and planning over many years. This has led to difficulties for transport planning, difficulties which have been exacerbated by insufficient investment in our Public Transport systems and infrastructure. We have not created enough transport options while our refusal to go underground has led to unacceptable levels of congestion above ground. This all has social, economic and environmental consequences. Most Dubliners now know that we must get away from short term thinking and plan for a city where our social and economic needs are integrated.

The world is changing very rapidly. We are now in the throes of a fourth industrial revolution which will change how and where people live and how they use cities and towns. There will be winners and losers in this process and we all have a responsibility to ensure that Dublin and its population are amongst the winners. We must ensure our city's sustainability through integrated planning that pre-empt the fundamental changes that we can expect in the course of the 21<sup>st</sup> century. Getting our transport priorities right and making appropriate investment is key to the unlocking of Dublin's potential and also creating the residential densities that will make our city work in the coming years. Given our housing crisis and the need to address our urban sprawl, creating greater densities within the M50 ring is important for our city's long-term sustainability. In this context, the proposals for spatial planning to be integrated with transport planning is to be welcomed. Planning decisions must take into account sustainable transport needs. It is also important that we avoid out of town developments that are not adequately served by sustainable transport modes and therefore quickly become overly reliant on private transport.

The correct decisions will also enable our residents and visitors traverse the city efficiently, allowing for the migration from non-sustainable and environmentally damaging transport options to more sustainable modes.

Many of the future proofing needs of the city are contained in the NTA's strategy document 2016-2035, however, it must be recognised that this plan is not sufficiently ambitious when it comes to timetables for delivery. Delivering projects in 2035 and beyond, when they were required before the century began is simply not good enough. As a society we have underinvested in the public good and we must now make up for lost time. It also has to be acknowledged that when it comes to encouraging the public to make the migration from car to sustainable transport the carrot may well be mightier than the stick. We must make sustainable options increasingly attractive rather than simply penalising choices with which we disagree.

It is clear that congestion in Dublin City is a major issue that must be addressed. In order to this we need to:

- Invest in public transport, prioritising options that move the largest number of passengers
  - Dublin Town opposes short term and ad hoc measures that do not address the underlying fundamental causes of congestion.
- Integrating public transport options to allow for efficient journeys through and across the city.
- Managing car usage during peak congestion periods.

We firmly believe that failure to make the appropriate investments in our transport infrastructure will have serious social, economic and environmental consequences.

### **Dublin Town Assessment**

Each day roughly 300,000 people visit Dublin City Centre giving rise to 450,000 pedestrian movements within the Business Improvement District. There is no doubt that getting that number of people in and out of the city, particularly at peak periods, has the potential to create difficulties. Dublin Town is of the view that we are trying to do too much above ground and that we simply do not have the capacity given our limited road space above ground to efficiently move the numbers of people who wish to come to the city.

Therefore, Dublin Town believes that priority should be given to the Metro Link and DART Underground projects and that the Luas extension projects should also be given priority. While there may be a view that bus solutions can be delivered in a shorter time span, we do not believe that these projects can adequately address the city's congestion problems. This is because the Metro Link has the potential the potential to carry 15,000 passengers per direction per hour; the DART Underground over 20,000 per direction per hour; LUAS 7,500 per direction per hour while each Bus Connects route is limited to 1,200 per direction per hour. We have a history of prioritising short term stop gaps that eventually become the long-term plan. While we support strengthening of the bus service as we note further below, we do not see this as a viable alternative to the two underground options both of which have been spoken about for some time and both of which are required without further delay.

In addition, we are conscious of the local concerns being raised where important corridors into the city and orbital routes are made bus only. There are concerns that residential areas will become rat

runs carrying traffic past homes, schools and local amenities in a manner that was never envisaged. This is likely to result in severe localised opposition that will significantly delay the implementation of the plans. Thus, a proposal being sold as a short-term implementable measure is in our view, likely take a long time to implement. This will delay the proposals which actually have the capacity to deliver the passenger movements required.

It is also our view that lower emission modes should be given priority.

## **Traffic Congestion**

There is undoubtedly traffic congestion in Dublin city centre particularly during peak periods. This congestion is primarily caused by commuters who are provided with free parking by their employers. The provision of such free car parking is particularly prevalent in the public sector. The provision of such free car parking is clearly at variance with Government policy. 32% of people passing the Canal Cordon count travelled by car, while research conducted for Dublin Town by Red C shows that 20% of shoppers use cars, with more shoppers accessing the city by bus. The Canal Cordon Count takes place at the peak rush hour, while shoppers for the most part come in during off-peak periods, when there is greater capacity available on the city's roads. Thus, a higher proportion of people use cars at peak periods, when road space is least available. It is clear that it is this peak period car user rather than the off-peak car user that is most responsible for the majority of traffic congestion.

Nottingham introduced a levy on employers both in the private and public sectors who provide more than 10 car parking spaces for employees. The funds derived from this scheme are used to improve the facilities for the city's tram and bus users and its cyclists. It has been recently reported that Reading is considering the introduction of a similar scheme, where it is proposed to charge employers who provide free parking, a fee of £1,000 for each parking space made available. It is ironic that the state seeks to reduce car use while, as recently reported in the Sunday Business Post, it spends several millions each year providing free car parking for its employees. It is well known that the availability of free parking is the key determinant in persuading people to drive to work.

## **Bus**

As noted above we are concerned that Bus Connects may not be deliverable within acceptable timescales and even on completion will carry a fraction of the numbers required.

We also believe that Bus Connects requires appropriate investment in on-street infrastructure such as shelters and signage. We believe passenger comfort and shelter must be a priority, especially given the need for interchange on routes. There are concerns that interchange points may be separated by large gaps from each other. It needs to be clarified how these interchanges will work in practice. Will a passenger disembark from one bus and connect with another at the same point or will there be a need to walk for some distance between stops?

Dublin Town welcomes the commitment to further reduce the lay over of buses within the city. Given the very limited road space in the city, we simply cannot afford to have buses sitting stationary on prime city streets.

The provision of 24 hour buses is greatly welcomed. International trends and the Dublin experience indicate that we will see greater evening and night time use of the city in the years to come. We can therefore expect more people to be in the city at night. This includes those socialising and those working in the Evening & Night Time Economy. We would like to see similar initiatives being introduced onto Luas and DART services. This may require the development of transport police as exist in other countries. Passengers must feel safe while using our transport service and the provision of Transport Gardaí could play an important role in this regard.

Dublin Bus has improved its service to the public exponentially over past two decades. We are not convinced that there is a need to bring alternative operators into subsidised bus market in Dublin. We believe that it is essential that the introduction of new operators is only considered where an increase in service can be clearly demonstrated rather than for ideological purposes.

## **Light Rail**

Dublin Town welcomes the proposed investment in Metro Link and looks forward to it being delivered as soon as possible. Given the current capacity issues on the Luas Green Line we believe that the up-grading of this line to a metro as far as Sandyford is justified. This demand will increase with additional residential and employment opportunities being created along the route. It is important that this infrastructure investment is made.

We also welcome the proposed extensions to the Luas system. We would like to see these extended lines also being delivered as soon as possible. It is disappointing that we don't yet have dates for their delivery. These extensions to Finglas, Lucan, Bray and Poolbeg must be prioritised and where necessary use private sector funding to bring them on stream at the earliest opportunity.

Consideration should also be given to the extension of the Green line beyond Finglas to Ballymun where it could meet with the Metro Link thus providing access to the airport with only one interchange for residents along the northern element of the Luas Green Line.

The ability to interchange from one mode of transport to another is vitally important and a key missing link in our public transport provision. Therefore, we would not like to see the removal of the Luas stop at Connolly Station which provides access between Heuston and Connolly stations and interchange with the Luas system.

The success of the Luas and the fact that it does not require an operating subsidy demonstrates the value in having an efficient and reliable public transport service. In addition, the fact that the Luas Cross City project was delivered on time and within budget demonstrates that we can deliver major infrastructure in Dublin. These facts answer any cynicism about the need and benefits of investment in our transport infrastructure.

## **Technology and leap cards**

The commitment to invest in the upgrading of technology and next generation leap cards is very welcome. It is important that there is an upgrade to the technology used on buses. At present it is not possible to tag on and off on a bus as is the case with the Luas, leading to some passengers being charged for full journey where they travel short distances, or slowing journey times with unnecessary queuing, making interchange unattractive. This needs to be addressed.

We welcome the commitment to simplify fares and also the move to unify the public transport brand and service. It is important that there be clarity and consistency in fare structures across the public transport system. At present this is not the case. It is also important for passengers not to feel penalised for using two or more elements of the public transport system on one trip.

We believe that the provision of reliable and sufficient Wi-Fi on all public transport would assist considerably in enhancing its attractiveness to passengers. Investment in provision of this service should be considered. We also believe that where feasible, consideration could be given to the provision of electrical recharging points. Thus, passengers could work and engage with acquaintances on social media as they travel from Point A to Point B.

## **Fares**

Luas does not receive an operating subsidy while Dublin Bus has one of the lowest rates of subsidy in Western Europe for a public bus service. This lack of investment has led to relatively large fares being charged to Dublin passengers. There appears to be a mis-match between Government policy and Government spending in the area of public transport. It is important that the cost of public transport is attractive relative to private transport and that we encourage as many trips as possible to be undertaken using public transport. Therefore, consideration must be given to improving the relative subvention to transport providers in order to secure a reduction in fares. The relatively high cost of fares in Dublin regularly features in Dublin Town research. In a November 2018 piece of research conducted by Red C on behalf of Dublin Town, 5% of those not visiting the north city centre cited the high cost of public transport, while 8% of south side shoppers noted the same. When those noting that they had reduced their travel by bus were asked why, 13% noted the high cost.

## **Heavy Rail**

As noted previously, Dublin Town does not believe that we can wait until after 2030 for the commencement of DART Underground. This project connects important elements of the transport system and also increases capacity in the system. It has been discussed for decades without delivery. This must be taken in hand and delivered upon.

We would suggest that longer term consideration be given to continuing the DART tunnel to Howth Junction and beyond to allow for separate over ground lines for the Belfast and freight trains. It is

important that there is a more regular and fast service between Dublin and Belfast serving the towns of Drogheda, Dundalk and Newry along the route.

We welcome the re-signalling project and look forward to its timely completion allowing for increased capacity along the current network.

### **Cycling**

Cycling for both commuting and recreational purposes is becoming increasingly popular and we expect that this trend will continue. We agree that additional bike parking facilities are required. Employers must be encouraged to facilitate employees who cycle to work to park within the work place.

It is anticipated that the upgrade of the Luas Green Line to a metro will require the shutting down of the Luas Green line for a period of months. It would make sense that the cycle infrastructure be improved along this route to facilitate commuters who may wish to transfer to the bike during the metro construction.

The extension of the journey planner to show safe cycle routes is an important addition and one that may persuade more people to take up cycling as part of their daily commute.

### **Traffic Re-routing**

While understanding the need for traffic re-routing, Dublin Town and its members would need to consider the detail of these proposals to assess the possible impacts on trade.

We would agree with the removal of on-street parking in a number of locations and the use of the space made available for widening of pavements to allow for greater pedestrian movements.

### **Accessibility**

Dublin Town believes that the city must be accessible by all. We therefore, welcome the proposals for increasing accessibility for persons with disabilities. In this context, we believe that the proposed Bus Connects interchanges must be planned in order to ensure visually impaired persons are facilitated.

### **Unified Brand**

Dublin Town supports the unitary brand and messaging for our public transport network. The customer wants to get from Point A to Point B and providing them with service and information to facilitate their journey must remain the key consideration.

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**1<sup>st</sup> February 2019**