

SUBMISSION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND TO THE NATIONAL TRANSPORT AUTHORITY'S PUBLIC CONSULTATION ON THE PREPARATION OF A NEW TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA

Introduction

The Chartered Institute of Logistics and Transport in Ireland (“the Institute”) is the independent professional body for people engaged in logistics and all modes of transport. The Institute is part of an international body with over 30,000 members worldwide. As a professional body, the Institute does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

The Institute welcomes the opportunity to respond to this public consultation.

Facing a New Reality

Ireland now faces a very different reality to that which existed when preparatory work for the current draft Strategy began and this may in part explain why that draft was never approved by the Minister for Transport. The Institute notes with potential concern that it is proposed to publish a draft of the new Strategy in mid-2015. This suggests either that a lot of the preparatory work is already complete or that a revision of the existing draft Strategy is all that is being planned. The Institute is strongly of the view that Authority should prepare a completely new Strategy, not just a revision of the existing draft document.

The preparatory work should take account of the new economic and financial realities. Long term economic growth is likely to be on a more modest and sustainable basis than that experienced during the so-called Celtic Tiger years. The state of the public finances is likely to be much more constrained over the period encompassed by the new Strategy and the capacity of both the Exchequer and private investors to fund extensive capital investment is likely to be much lower. The draft *Strategic Framework for Investment in Land Transport*, coupled with the *Comprehensive Expenditure Reviews* and the concurrent reviews of capital expenditure provide a sobering and realistic context for the preparation of the new Strategy. While house prices have recovered, housing construction in the Greater Dublin Area has been slow to get underway and the transportation implications of this need to be carefully assessed.

In the paragraphs that follow the Institute sets out its views on a number of important considerations which it believes should be taken into account in preparing the new Strategy.

Importance of Realism

A key failing of transport strategies developed over the last forty years is that they have tended to be too conservative when the economy was in decline and too ambitious when the economy was growing strongly. Worse still they have been out of kilter with the economic cycle, with too many very expensive proposals when the economy is in recession and too few when it is growing strongly. In preparing the new Strategy, the Authority should make a realistic assessment of likely growth in the economy, population, employment and public spending and extrapolate from that a range of likely scenarios for growth in transport demand and realistic scenarios for future funding of transport in the Greater Dublin Area. This is no easy task but realism is essential to the successful implementation of the new Strategy.

The Socio-Economic Case for Public Expenditure on Transport in the Greater Dublin Area

There is a risk in a period of continuing constraints on public finances and with a number of emerging public investment priorities, such as housing, water services and rural broadband, that expenditure on transport, particularly in the Greater Dublin Area, will be neglected. This would be a false economy and simply repeat the mistakes of the 1970s and 1980s. As a result of the decisions taken then, we were left with a crumbling transport system which was patently unfit for purpose and which required the State to make major investments in the latter part of the twentieth century simply to stand still.

The new Strategy should set out strong and cogent reasons for increased public expenditure on transport in the Greater Dublin Area and explain clearly the economic, social and environmental consequences of not doing so. The following are among the issues which should be addressed:

- An efficient transport system is essential to economic prosperity, sustainability and a good quality of life in the Greater Dublin Area. It is necessary to support economic development, both by ensuring the efficient movement of goods and enabling employees to access places of employment. It is also an important factor in attracting continued foreign direct investment to the capital region. Or more accurately an inefficient transport system will be a significant deterrent to such investment in the future – on both efficiency and quality of life grounds.
- Notwithstanding the substantial investment in the 1990s and 2000s, the quality

of Greater Dublin Area's transport infrastructure and services is not on a par with city regions in many other developed countries. While we have improved our ranking, we still rate relatively poorly in international competitiveness surveys.

- The present level of public expenditure on transport is well below what the International Transport Forum, an intergovernmental body within the OECD family, considers appropriate for a developed economy.
- As the economy improves and employment increases, congestion and system bottlenecks will quickly re-emerge and become constraints on development and detrimental to the quality of life. It is clear from previous experience that congestion can very quickly become a serious problem in the capital city and that it is already too late to respond when the problem is a reality.
- Ireland has to meet very challenging targets for reduced greenhouse gas emissions. Transport is a major source of emissions and a combination of technological changes and investment in sustainable modes of transport will be needed to help meet our targets. Urban transport is one area which is most susceptible to policy changes and investment decisions which can significantly reduce emissions.

Priorities for Transportation Expenditure in the Greater Dublin Area

The top priorities for transportation expenditure (capital and current) in the years ahead should be to:

- maintain the transportation capacity that already exists and that is currently in use in the Greater Dublin Area;
- develop the public transport system to meet the transportation requirements of the economy and society and provide an effective alternative to the private car;
- maximise the use of existing transport assets;
- increase the modal share for cycling and walking so that they become the primary means of travel for shorter journeys;
- introduce effective measures to manage demand for travel.

Maintaining Existing Transportation Capacity

The transportation capacity of the city region consists of the existing road, rail and light rail infrastructure, the urban bus network and the limited cycle network. International experience shows that a failure to maintain transportation infrastructure invariably results in a far greater cost to restore it than was saved in deferred maintenance. Similarly, international experience shows that curtailment of

the public transport network and service retrenchment lead to significant and sustained reductions in passenger numbers, with the result that greater expenditure than that saved is subsequently required to recover those passengers. Rarely if ever is the lost modal share fully recovered.

Resources should be allocated first to the maintenance and renewal of those assets which are most productive or which are targeted to deliver increased productivity. In this regard, it is a source of concern to the Institute that the current draft Strategy pays very little attention to the need to maintain and renew existing assets and fails to quantify the substantial costs involved. It also omits to draw attention to the serious economic and social consequences of not investing adequately in such maintenance and renewal.

Protect Existing Infrastructural Investment

The first priority for transport expenditure (both capital and current) in the years immediately ahead in the Greater Dublin Area should be the maintenance in good repair and the renewal of the existing transport infrastructure and the provision of adequate PSO funding to support the provision of public transport services.

Total Exchequer expenditure (capital and current) on regional and local roads nationally declined from a reasonably adequate level of over €600 million in 2008 to probably about €400 million at present. Local authority own-resources expenditure from the Local Government Fund, rates and development levies has also fallen. It must be recognised that a failure to sustain maintenance and renewal expenditure at an adequate level will result in a rapid deterioration in road condition and the undoing of the major renewal investment in the regional and local road network since the late 1990s. This problem has been exacerbated by the damage caused by flooding and severe cold over two recent successive winters. Additional expenditure was required on winter maintenance and on the repair of the damage caused and this in turn further reduced the already inadequate spending on ongoing maintenance and renewal. Many roads in the Greater Dublin Area have very heavy traffic levels reflective of their location in a more densely populated area with a high level of economic activity and this increases the funding requirement for their maintenance and renewal. Footpaths in urban areas are also showing a significant deterioration in recent years, probably reflecting lower maintenance and renewal expenditure, the effects of a couple of severe Winters and increasing encroachment by commercial vehicles and cars.

An average of about €100 million per annum has been spent by the Exchequer on the renewal of the rail network nationally over the past decade and a half and this has vastly improved safety and reliability. Standards will quickly deteriorate again if an adequate level of maintenance and renewal expenditure is not sustained in the years ahead. The result will be slower speeds, less reliable journeys and reduced

safety. The suburban railway in the Greater Dublin Area is particularly vulnerable to such underinvestment because it is the most intensively used part of the network.

There was also major investment in suburban rail rolling stock for over a decade. It is important that these vehicles are adequately maintained and that mid-life refits are undertaken at the right time. Failure to do this in a timely way will compromise safety and reliability and we will return to the poor and deteriorating services we experienced in much of the latter half of the twentieth century. Much of this rolling stock will be due for replacement over the period covered by the new Strategy, particularly the original 1980s DART rolling stock, and adequate funding provision should be made in the new Strategy for this purpose.

Since the end of the 1990s there has been substantial Exchequer, EU and company investment in buses which renewed the existing fleet and facilitated the expansion of services in the Greater Dublin Area and its wider commuting zone. Much of that fleet has now reached the end of its useful life and needs to be replaced. There will also be at least one further full bus replacement cycle over the 20 year period of the new Strategy which needs to be provided for. A failure to do this in a timely way will increase maintenance costs, reduce vehicle reliability and ultimately substantially diminish the standard and extent of bus services. The Institute is not expressing any view on how the fleet renewal should be achieved. Subject to compliance with the relevant provisions of EU and Irish law, it might be through direct investment or appropriate provisions in public service contracts, either direct award or tendered.

The original Luas infrastructure is now over a decade old and will require increased maintenance and some renewal over the period of the new Strategy. The trams will require a mid-life refit and the original fleet will be reaching the end of its useful life during the period. Adequate provision should be made in the new Strategy to fund these requirements.

Develop Public Transport

An effective public transport system is essential for the future economic development of the Greater Dublin Area, for the creation of a sustainable city and transport system and for ensuring a high quality of life for our citizens. This requires the development of a public transport system which meets the travel needs of the city region and which delivers the necessary capacity, frequency, quality and integration. The paragraphs which follow set out what the Institute considers to be the building blocks to achieve this.

Support Public Transport Services

The total Exchequer provision for public transport PSO support payments nationally has fallen from about €310 million in 2008 to €221 million this year. In the case of Dublin Bus, the PSO support payments have declined from €85.6 million in 2008 to €64.5 million in 2013. The reduction experienced by Iarnród Éireann nationally has been particularly substantial, from a peak of €189.9 million in 2007 to €127.0 million in 2013, reflecting the proportionately larger part of its funding which comes from the public purse.

The Institute supports the measures taken by the public transport companies to reduce costs, improve efficiencies and rationalise services and considers that these should continue. Notwithstanding these measures, a continuing decline in PSO support payments would result in real reductions in the total quantity of public transport services provided and the Institute welcomes the decision in Budget 2015 not to reduce these PSO payments further.

There have also been very significant fares increases in recent years, designed to close the funding gap. While they were understandable in the particular circumstances, any continuation of increases of this magnitude in the future would be counter-productive and lead to a further reduction in public transport patronage.

Total public transport journeys nationally fell by 20% between 2007 and 2012 and stabilised in 2013. In the case of Dublin Bus, patronage fell from 147.5 million in 2007 to 114.3 million in 2013 (a fall of 22%) and has only just begun to recover. Passenger numbers on DART and Dublin suburban rail services fell from 34.1 million in 2007 to 25.7 million in 2012, a fall of a quarter.

A continuation of the policy of freezing or reducing PSO support payments and increasing fares beyond the level of general inflation is not a viable option in the Greater Dublin Area. A substantial increase in the modal share enjoyed by public transport is essential for the future economic development and societal wellbeing of the Greater Dublin Area. This in turn will require a significant increase in the level of PSO support. However, this should be accompanied by a policy which treats public transport as a business capable of development and in which both revenue and cost performance can be improved. This would represent a departure from the traditional view of public transport as a 'cost' or 'subsidy' problem to be resolved when public finances are constrained.

The effort to reduce costs, improve efficiency and redesign networks to deliver more effective and integrated services should continue. The baseline level of PSO funding for existing services could continue to be constrained to drive efficiencies, but should be supplemented by payments targeted to specific purposes. A substantial proportion of the proposed increase in PSO funding might usefully be made conditional on the public transport operators submitting to the National Transport Authority credible strategies to grow public transport use. This additional funding should only continue to be made available where the forecast increases in

public transport usage are in fact delivered. This approach would be consistent with the objectives set out in *Smarter Travel* which sought to transfer 500,000 daily commuting trips from the private car to alternative means of travel and to reduce the modal share for car commuting from 65% to 45% by 2020. The new Strategy should reaffirm the Authority's commitment to the *Smarter Travel* objectives and also commit to the UITP (International Association of Public Transport) *PTx2* objective of doubling public transport use by 2025.

Bus Transport and Bus Rapid Transit as a Key Component of the New Strategy

Because of the likely continuing constraints on the public finances and the relative ease of implementation, buses should play a central role in the new Strategy in the delivery of additional public transport capacity. Bus rapid transit (BRT) has a vital part to play in the more effective delivery of bus services in the Greater Dublin Area. The Institute welcomes the proposals by the Authority to develop three corridors in Dublin and we now call for the wider development of BRT in the new Strategy.

There are about 100 bus rapid transit systems operational worldwide and a similar number are at various stages of feasibility study, design and construction. It is a proven mass transport technology and has demonstrated an ability to substantially increase public transport use. When correctly designed and implemented, it can provide capacity and quality on a par with or exceeding that of tram or light rail and in exceptional circumstances can provide capacity comparable to full metro. It should not be seen as a cheaper and inferior alternative to rail-based investment, but as a high quality, lower cost public transport solution in many circumstances.

In 2012 the Institute published a policy brief on BRT which called for a fundamental rethink on the potential of bus-based transit solutions for Ireland's major urban areas. It also organised seminars to increase understanding and knowledge of the BRT concept and consider potential applications in Ireland. The Institute will continue to do everything it can to support and promote the development of BRT in Ireland and the comments which we make below should be considered in that context.

It would be very helpful if the NTA published a short statement in its new Strategy outlining its high level policy on BRT, explaining how it sees BRT fitting into the overall public transport network for the Greater Dublin Area and setting out some of the key technical and performance criteria it proposes to adopt. It published a very useful Core Dublin Network Study in October 2012 which gave some indication of its overall approach and set out a number of conclusions and recommendations. The materials published for the recent consultations also give further indications of the NTA's thinking. While it is possible to divine much of the NTA's possible policy

approach from these publications, it would be very useful to have an explicit statement of the Authority's overall policy perspective on BRT.

The Core Dublin Network Study recommended that the BRT system should be based on a moderate capacity system of 2,400 to 3,600 ppdph, with the possibility of expansion to 4,500 if longer vehicles of up to 25 metres were authorised for use at some future point. This is based on a maximum frequency of 30 vehicles per hour. This capacity threshold was increased somewhat in the recent consultation document on the Fingal North Dublin Transport Study, with a maximum capacity of 7000ppdph identified for one of the BRT options studied and a maximum capacity of 4500ppdph for the remaining options. While this was welcome, the Institute still considers that this is an unduly conservative approach and urges the NTA to reconsider.

Practical experience elsewhere and observation of performance on the existing QBCs in Dublin suggests that significantly higher capacities are potentially achievable. We accept that there will be constraints which mean that higher frequencies and capacities are not always achievable, but this is not a sufficient reason for adopting such a conservative capacity ceiling. Another reason for considering a higher capacity threshold is the fact that the levels of public funding available for transport investment are likely to be constrained for an extended period and are unlikely again to reach the levels achieved (in real terms) in the late 2000s. There is therefore an increased imperative to seek effective lower cost solutions to transport deficiencies; high performance BRT is one such potential solution.

The Institute considers that the approach to the design of BRT routes should be based on LRT standards. The aim should not be to build a "tram on tyres" but rather to deliver a public transport product of equivalent quality coupled with the flexibility of the bus. Consider what would be appropriate if LRT was being built on the route and only depart from that standard where there is a robust and objective technical justification for doing so. There is no reason why lower standards should be acceptable for a bus but not for a tram. In advocating this, we accept that it will not be necessary to adopt certain LRT standards. For example, as mentioned in the Core Dublin Network Study, it will not be necessary to relocate underground utilities along most of the path of a BRT route. We also urge the NTA to consider the implementation of BRT in a wider urban design context and to view its implementation as not only a way to improve public transport provision but to enhance the urban space. This approach was a success for Luas and should be replicated when developing BRT.

Ensure Better Integration of the Public Transport Product

The Authority has made substantial and very welcome progress on improved integration of public transport, particularly through the introduction of the Leap card, the rationalisation of the fares system and the development of real time passenger information and travel planning. These elements should be further developed under the new Strategy.

New technical platforms should be developed for ticketing in line with technological developments. The Central Bank recently sponsored a very useful seminar on payments systems which will be most helpful in informing the Authority's work in this area. Further integration and simplification of fares should continue so as to make it as easy as possible for everybody to travel and to ensure that the fare charged reflects the journey taken rather than the number of interchanges made.

With limited exceptions, interchange facilities are poor in Dublin. Interchange between public transport services should be as simple, convenient and effective as possible. Transfer distances between stations/stops should be minimised and the routes to be taken should be as direct and legible as possible (examples of good signposting and footpath markings at interchange points in Barcelona were shown in a presentation to a recent CILT/Engineers Ireland seminar). High quality passenger facilities should be developed at major interchange points drawing on earlier work done by the Dublin Transportation Office.

The development of orbital bus services should be considered so as to create a mesh of public transport services and make it easier to go from one suburb to another without always having to transit through the city centre. Feeder bus services providing link to high capacity public transport modes should be considered where they provide an economic means of extending the relevant travel catchment.

Park+ride policy should be reviewed to establish whether it can play a more effective role in encouraging greater public transport use without simply relocating car trips rather than reducing them.

Sweat the Existing Assets

A priority for capital investment in the Greater Dublin Area should be to sweat the existing transport assets before considering the provision of entirely new infrastructure. Even if public finances were not as constrained as they currently are and will continue to be, it would always be a sensible and rational policy to maximise the use of what we already have before building or buying something new. If, as proposed earlier, funding priority is given to maintaining and renewing the existing infrastructure and to expanding public transport services, little funding will be available for large new infrastructure projects. There is also limited scope for further PPP investment and, where such investment is made, it will have first

call on limited future Exchequer funding, pre-empting spending on other perhaps more important projects. In the light of these factors, the paragraphs that follow put forward a number of practical suggestions for consideration by Government.

All of the State agencies involved in the provision and maintenance of transport infrastructure and services in the Greater Dublin Area should be formally mandated to sweat their assets and to include in their strategies, business plans and investment programmes specific measures to achieve this objective. This may require a change in policy orientation by some agencies and the acquisition of different skillsets to those required for the development of new infrastructure.

In the case of roads, the preferred option should be to maximise the use of the existing network, prioritising public transport, cycling and goods distribution where appropriate. Policy in relation to on-street parking needs to be very carefully considered, particularly for heavily used roads which perform a strategic function. The reality is that, in the case of many four lane roads, only two lanes are available for traffic. This is a misuse of a scarce resource and the solution should not be to build even more roads to be parked upon. The Institute recognises that there are no simple solutions to this issue; vehicles need somewhere to park. Greater attention will have to be paid to the provision and more effective regulation of off-street car parking. Parking control policies (charging, clamping and tow away) have proved to be very effective and should be intensified. It will also be important to ensure that parking policies (and particularly pricing policies) are consistent across the Greater Dublin Area.

Lane markings, directional and information signposting can play an important part in optimising road use and should be well maintained and renewed.

In the case of public transport, measures to improve bus services should be continued. A lot of good work has been done by local authorities on the implementation of bus priority measures across the city region. However this work should urgently be intensified and accelerated. The existing bus priority measures need to be reviewed and enhanced and urgent action needs to be taken to tackle the remaining bottlenecks and pinch points. This work should be based on the principle of delivering free flow conditions for bus services operating on urban roads. Improved bus priority needs to be delivered not just on those sections of road where it is easy or convenient to do so but wherever required across the whole road network. This will be difficult and will be opposed by some interests, but now is the ideal time to do it when funding for investment in high cost alternatives is not available.

In the case of rail, the emphasis should be on the consolidation of existing investment. Land use policies can be used to achieve this by directing development to corridors which have benefitted from recent investment and which have spare capacity. Examples include the Sandyford to Bride's Glen and

Saggart/Citywest Luas extensions and the four tracked section of the Kildare commuter rail line. This should be reinforced by a clear policy statement, backed up by action, that failure to pursue effective land use policies which support these existing investments would have negative consequences for future public transport investment in the area.

The current draft Strategy proposed the provision of additional tracks on the Northern rail line between Connolly and Balbriggan, subject to a feasibility and economic assessment. In principle this would be a sensible way of maximising the use of the existing infrastructure and would deliver capacity enhancements additional to those being provided by the welcome re-signalling programme. However it is not clear whether any progress has been made on establishing the feasibility and economic viability of providing extra tracks on this corridor, despite its being recommended as long ago as *A Platform for Change*. It is essential that a definitive answer is provided in the new Strategy.

Since NAMA controls a large proportion of the available development land, the State is now in a position potentially to exert a strong influence on the pattern and timing of future land use development. The Authority should therefore give urgent consideration to possible formal mechanisms for achieving this in a way which does not compromise NAMA's fundamental policy objectives.

Examples of what could be done from a land use perspective include the location of high density residential development and employment intensive development in public transport corridors and the construction of park+ride facilities close to commuter rail and Luas stops. Pressures to opt for lower density residential development in public transport corridors should be strongly resisted as environmentally unsustainable and seriously damaging to the economics of public transport. High density residential development does not equate to high rise but, when well designed, can provide a very attractive alternative to the traditional lower density housing.

Information technology can be used very effectively to improve the efficiency, increase the capacity and enhance the quality of the transport system. There is already a good basic platform on which to develop this capability. Many vehicles are currently equipped with devices that can receive intelligent transport systems (ITS) services or function as data generators or probes. Most public transport users have access to mobile phones or other mobile communications devices. ITS investment in the road network needs to be accelerated. Information technology applications in public transport, such as improved signalling, automatic vehicle location, public transport vehicle prioritisation, real time passenger information and automated ticketing, should be intensified. The scope for increased use of sophisticated urban traffic management systems needs to be more fully exploited. These developments will require substantial expenditure, but will still be low cost when compared with the construction of new infrastructure and will deliver higher

returns on investment. There should also be scope for sharing the cost with the private sector of delivering these services to the end user.

Targeted New Investment

The need for new transport investment may not be evident to many. The major motorway programme has been completed, the railways renewed and the bus and rail fleet modernised. There is a false perception that urban congestion is no longer a problem. The difficulty is that, based on experience in the 1970s and 1980s, urban congestion does ease substantially during a recession but emerges again very rapidly when the economy recovers. There are also substantial investment backlogs across the network.

Any programme of new investment proposed in the new Strategy has to be more than a series of modal investment proposals brought together between two covers and presented as a strategy. It needs to demonstrate integrated thinking. The proposed investments must to be mutually reinforcing, not pulling in different directions. Potential projects should be evaluated using a common evaluation framework and should only be given the go-ahead where it is robustly demonstrated that alternatives such as sweating existing assets and demand management will not achieve the relevant policy objectives. Because of the scarcity of finance, we need to choose those projects and programmes which provide the best return on investment and best assist the development of the Greater Dublin Area as a sustainable economy and society. Project selection should also be guided by the requirements identified by the State's enterprise development agencies.

Introduce Demand Management

This is an ideal time to begin the implementation of appropriate demand management policies, particularly road pricing. The economic case for road pricing as a demand management tool is already well established, it provides a way of raising additional funding for transport and there will never be a better opportunity to make the difficult decisions required.

Work should begin on the development of a congestion pricing system for the Greater Dublin Area and a road pricing system for the national road network. The technical planning and the preparation and passage of the necessary legislation is likely to take some time. Now is the time to begin this work, not when severe congestion becomes a reality once again as strong economic growth resumes. A lengthy period will also be required to increase public understanding of the need for such measures and this is perhaps the most significant challenge to be

addressed. The new Strategy can play a key role in articulating the case for demand management and in creating the right climate that enables politicians to take and sustain the necessary decisions, as happened in the case of the London congestion charge.

As an interim measure, multi-point tolling could be introduced on the M50. The level of toll charged at any one point should be much lower than the existing WestLink toll and the total toll charged for a journey should reflect the length of the M50 traversed by a vehicle. This would be more equitable as all users would pay something rather than just those who travel over the Liffey bridge. It would also quickly generate additional revenue for investment and provide a starting point for demand management on the road. The M50 Demand Management Study, published in April 2014 by the NRA, provides a very useful context for this work and recommends a range of demand management measures.

If we fail to manage demand on the M50 in an effective way, it will quickly reach capacity again and fail in its primary function as a bypass road. There are already serious warning signs. According to the NRA study, traffic growth of up to 25% has been experienced on some sections of the M50 since 2010 and is already causing congestion. This was during a difficult economic period when traffic across the national primary network declined by 5%. By November 2011, 12% of sections of the M50 already had peak traffic flows which exceeded safe operating capacity and it is forecast that by 2023 50% of the motorway sections will exceed safe operating capacity, not only at peak periods but at other times of the day. We are therefore very likely to see a repeat of what happened before and required major expenditure to add additional lanes and increase capacity. This time it will not be possible to build extra capacity, even if that were desirable, and the only realistic alternative is effective management of demand.

It is also important to note that a demand management programme needs to be well thought out, coherent and carefully implemented. It is not enough to simply implement a series of demand management measures on their own. They must be accompanied by supporting measures such as the provision of appropriate alternative public transport options for necessary journeys which are currently made by car. However, modest levels of investment in public transport, like Luas Cross-City and additional bus services, will not address the capacity problem on the M50. Additional public transport is undoubtedly part of the solution to congestion on the M50. However it will only work if it is accompanied by demand management and if the public transport services are designed to provide a realistic alternative to a significant proportion of the car journeys which use the M50. We also acknowledge that the implementation of multi-point tolling could divert road traffic into areas surrounding the M50 but this only serves to emphasise the importance of a multi-faceted approach using a range of measures including increased public transport, pricing and other demand management tools.

Make Definitive Decisions on the Mega Projects

Decisions on a number of mega projects, particularly Metro North and DART Underground, were deferred during the crisis in the public finances. The Authority should set out a clear position on the future of these projects in the new Strategy because this will have critical implications for the development of the transport system in the Greater Dublin Area and for the future direction of land use policy and development in the region. It will be most important to consider not only whether they are an essential part of any future transportation and land use strategy but also whether we have the financial capacity to deliver them and pay for them over the longer term. Including such projects in a future Strategy, only to see them languish for lack of finance to build and operate them, would be unwise. It would unbalance and undermine the credibility of the Strategy itself and lead to land use policies being adopted on essentially a false premise as to the scale and availability of future public transport capacity.

Land Use and Transport Interaction

Critical to the success of the new Strategy will be the interaction between land use and transport policy. Land use policy and practice must be supportive of and consistent with the transport plans. There is no point in investing in expensive public transport infrastructure and services if the associated land use policy favours low density residential development in the catchment. Equally there is no point pursuing supportive land use policies if there is no realistic prospect of the relevant transport infrastructure and services being delivered within a reasonable timescale.

The Authority is required by law to ensure that the transport strategy is consistent with the relevant regional planning guidelines. However there must be an effective iterative engagement, involving both the Authority and regional/local authorities, to ensure consistency between both spatial/land use and transport policies. There may be a need to amend the regional planning guidelines, or the successor regional spatial and economic strategy, to reflect the new economic realities. There is no point in producing a new transport strategy which is consistent with a set of regional planning guidelines which are themselves in need of revision. It is much more important that both the spatial/land use guidelines and the transport strategy are properly synchronised for the future.

The new Strategy should have a clear and cogent exposition of the interdependence between the transportation strategy and land use policy and an explicit statement of the implications of a failure to deliver on either. The consequences of non-delivery need to be clearly spelt out, including that a failure to deliver appropriate land use policies on the ground will lead to the abandonment or scaling back of the related transport investment.

Address Freight and Goods Distribution

The primary focus of previous transport strategies has been on the movement of people rather than goods. The current draft Strategy includes a very welcome section on freight but much of what is proposed involves further restrictions on freight movement and goods deliveries. The Institute strongly urges the Authority to give greater attention to the importance of freight and goods distribution to the health of the regional and national economy. This should include consideration of measures which will improve the efficiency of the logistics system as well as ensuring that goods traffic is regulated in a way which minimises any adverse impacts on the wider transport system.

Facilitate Access Transport

Access transport by sea and air is critical to the continuing success of the Irish economy, whether for the movement of goods exports and imports or passenger access. Dublin Port plays a major role in our economy. According to a recent Competition Authority study *Competition in the Irish Ports Sector*, Dublin Port accounted for 57% of all LoLo tonnage on the island of Ireland in 2012 and for 43% of all RoRo tonnage. Dublin Airport is the dominant passenger airport in the country, accounting for over four fifths of all passenger traffic. It also accounts for almost 90% of total air freight tonnage.

The new Strategy should carefully consider how it can best facilitate access to both Dublin Port and Dublin Airport. It will be particularly important to ensure that there is an effective interaction between the Authority and the port and airport authorities so that access transport requirements are met in a way that ensures that they do not compromise the development of an effective internal transport system for the Greater Dublin Area. The port and airport authorities should also ensure that their plans for the further development of Dublin Port and Dublin Airport carefully consider the implications for the surrounding surface system.

Cycling and Walking as Major Components of Sustainable Transport

A lot of progress has been made on the promotion of cycling and walking in the Greater Dublin Area, reflected in the development of cycle tracks and lanes, the highly successful Dublin Bikes scheme and improved pedestrian facilities on our streets. However there is still huge potential to further increase the modal share enjoyed by cycling and walking, particularly for short to medium length journeys. The original Dublin Transportation Initiative placed great emphasis on the development of cycling and pedestrian networks and we still have some way to go before we can truly say that a network exists for these modes. The interaction of these modes with mechanised traffic also needs to be addressed. While the travel

environment for cyclists can often be very challenging and dangerous, cycling behaviour must be addressed through education, promotion and enforcement. Problems encountered include cycling through pedestrian lights and cycling on footpaths, thereby endangering pedestrians. Improved priority for pedestrians crossing roads and streets and safer footpaths should also be addressed.

Undertake Project Planning Now

Over the past few years, expenditure on project planning was sharply reduced. This was quite understandable in the challenging economic situation which then existed. However that decision should now be reversed. Past experience shows that congestion very quickly returns once the economy begins to recover and employment starts to grow. This is particularly true of the Greater Dublin Area. It is too late to begin project planning when the congestion is already evident. It needs to begin in anticipation of the problems emerging so that the projects can be implemented as a timely response, subject to the necessary finances being available. The Institute therefore recommends that the new Strategy includes appropriate provision for a carefully targeted programme of project planning and the necessary funding to support this work.

Provide a Better Background Analysis

The current draft Strategy was open to criticism that the published document did not include sufficient information on the economic, demographic and land use assumptions underlying the development of its preferred transportation strategy. It is essential to an understanding of the project and modal choices being proposed in the new Strategy that they are supported by published detailed travel data, particularly line flow forecasts for the principal transportation corridors. Without access to this information, it is impossible to make an informed judgement about the appropriateness and efficacy of the proposed strategy and its principal components.

It will also be important to understand the interdependencies within the new Strategy. Which project or modal choices are dependent on the successful implementation of supporting policies such as the intensification of land uses or the introduction of demand management measures and what are the consequences for those choices of a failure to implement the relevant policies?

The current draft Strategy contains no financial information and only very limited data is available in the published background papers. The new Strategy should contain a detailed financial chapter setting out not only the indicative capital costs but also the ongoing costs relating to the maintenance, renewal and management

of existing infrastructure and the operation of services. These should be the total costs, not just the incremental costs, and should cover maintenance, renewal, management and operation. There should also be some discussion of the potential sources of funding and an indicative phasing of expenditure, to provide guidance on the relative priority of particular measures recommended in the Strategy.

Effective Engagement with Statutory Agencies

The development of the original Dublin Transportation Initiative and the successor strategy *A Platform for Change* was undertaken as a collaborative effort by the relevant Government Departments, local authorities and public transport operators. This approach has two principal benefits – it availed of the extensive expertise in those organisations and it helped ensure personal and institutional buy-in to the emerging strategy. The Institute recommends that the Authority put in place arrangements for the effective involvement of the local authorities and relevant transport bodies in the preparation of the new Strategy. This should extend beyond mere formal consultation to real engagement. Such an approach does not take away from the Authority’s statutory function to prepare a transport strategy but enhances it and shows an openness to ideas and alternative perspectives.

Section 17 of the Dublin Transport Authority Act 2008 provides for the establishment of an Advisory Council and among its functions are the consideration of the draft Strategy and the making of recommendation on it to the Authority. It appears that the Advisory Council has yet to be established, some five years after the establishment of the Authority. This is a matter of regret and the Institute recommends that early action is taken to establish the Council. It could perform a useful consultative role during the preparation of the new Strategy, as well as advising the Authority on its wider functions. The Institute would be willing to nominate a person to serve on the Council.

Chartered Institute of Logistics and Transport in Ireland

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