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To whom it may concern,

As Green Party Councillors for the South East Area, representing Kimmage Rathmines, the South East Inner City and Pembroke, we wish to highlight the following observations and concerns about the NTA's recently published Greater Dublin Area Transport Strategy.

As we emerge from the Covid crisis while continuing to deal with a climate emergency, it is clear that we cannot accept a return to a gridlocked city with chronic car-dependency, ever-worsening air quality, poor walking and cycling infrastructure and the ongoing loss of biodiversity. It is heartening to see that in the last round of consultation, over 4,000 individuals and groups submitted their views and ideas, and that almost everyone agreed we need to reduce private car usage. Clearly these submissions recognised, as we do, that the imperative to offer safe, sustainable and low-carbon transport options has never been more urgent.

We believe in an integrated transport solution for Dublin; one that creates an opportunity to reimagine our city and plan for a future where Dublin is a connected, climate-resilient capital where streets are for people and private car ownership is an option not a necessity.

While the spirit of the GDA Transport Strategy speaks to this vision in a 'big picture' sense, and there are aspects of it that are very welcome, it must be stated that the strategy lacks the urgency, ambition, specificity and scale of action we need to drive the modal shift our city needs to make if we are to achieve that vision on a timeline that is conducive to reaching our climate goals. We hope you will consider the following comments on the actions needed to ensure this strategy is bold, ambitious and visionary, and delivers for the people, the environment, the public realm and the quality of life of residents in Dublin city, the South East area, and beyond.

Transport:

A core focus of the strategy must be on the reallocation of road space to walking, cycling, e mobility and public transport, with **specific targets** set out. Currently there are large gaps in the proposed network, and it's critical to recognise that lack of connectivity will have implications for modal choice, and strangely, the role of public transport in enabling citizens to move **around** their city is largely ignored. Safety on public transport must be a priority, with adequate security on the all routes, in stations and with well-lit, secure access to public transport stations.

Bus

In general, we believe that efficiency, reliability, regularity and on board safety of the bus service is paramount if BusConnects is to instigate the modal shift away from private car use and over to public transport. Every effort must be made to ensure that buses are not blocked by private modes

of transportation, or indeed by delivery vehicles or illegally parked cars. Enforcement and monitoring of bus lanes will be crucial, and the NTA should outline the specific measures that will be employed to prevent this, including looking at the use of ANPR. It **has to be** convenient for people to take the bus. Real time information must be available and reliable, and bus shelters must be secure, well lit, provide shelter, not hinder passage on footpaths and not face away from the direction of oncoming buses. Furthermore, it must be noted that:

- Bus Connects plans/timelines have not taken into account the significant local opposition in many areas to some of the key infrastructural changes they propose, and potential delays do not seem to be factored in.
- With a significant portion of this decade's projects centred around upgrading the bus system, the margin for error if this fails to instigate a modal shift to public transport is concerning. Luas lines to Finglas, Lucan, Bray and perhaps Poolbeg are all proposed in the strategy, with no clear time lines given, and construction of these lines depends on demand for travel exceeding what can be met by bus. This ignores international research which shows how provision of high quality trams can dramatically increase demand for public transport. The Strategy assumes that the upgrading of the bus network will have similar consequences and this assumption may not prove true.
- The City Centre Bus Network Redesign needs to be accelerated to facilitate the pedestrianisation of College Green and other key pedestrianisation projects in the City Centre that are critical to public realm improvements, pedestrian and cyclist safety, the economic survival of the City Centre and reducing our transport emissions.

Rail

Our primary concern around the rail and light rail elements of the strategy centre around the timelines for delivery. We believe these **must** be reviewed and reduced. If we are to wait until after 2042 to deliver key light rail and other public transport projects, we simply will not – **cannot** - reach our 2050 transport emission reduction targets. Furthermore:

- The Poolbeg West Luas should be prioritised and installed in conjunction with the development at Poolbeg West as was the case for Cherrywood and Adamstown SDZ's.
- We need to increase the Green Line in terms of frequency in preparation for Cherrywood coming online. A strategy is already in place for addition rail cars but that will only increase capacity to a certain point. Frequency needs to be incorporated also.
- There is no proposal for a rail or light rail link crossing the south west of the city, with the proposed 2042 Combined Rail Network map illustrating a large gap in the South West compared to the rest of the city. There is obvious and untapped potential to fill that gap with an extended Metrolink, and serious consideration should be given to extending it to the South West. The feasibility of constructing an underground system that terminates in the city centre as opposed to maximising the potential to carry passengers from both outer reaches of the suburbs into the city should be reexamined.
- While Luas plans include running a line through Terenure post-2042 as part of the red line redesign (Tallaght-Knocklyon-City Centre), we must consider the impact of proposing a Luas / light rail solution in the future for communities that will have undergone significant reshaping to accommodate BusConnects.

Walking and cycling

Figures in this strategy showing an increase in cycling are welcome and must be built on, but plans for rolling out cycling infrastructure must be predicated on routes being segregated, designed to international best practice standards, and designed with inclusivity in mind, encouraging people of all ages and abilities to get on their bikes. Cycling Infrastructure has to be **safe, connected, 24 hour**, and not leave people facing difficult junctions or trying to plan their routes around avoiding challenging areas or infrastructural black holes. Ideally, it should be along existing desire lines to ensure that more people can choose cycling as their primary mode of transport, and – where possible – that cyclists can safely choose the most direct routes.

The hierarchy of the street should be acknowledged and referred to throughout the strategy, clearly illustrating a commitment to prioritising the most vulnerable road users. With that in mind, the NTA must also acknowledge the degree to which school drop offs and pick ups contribute to the traffic levels on our roads, and the degree to which active travel contributes to children's well-being and independence, and ensure that safe walking and cycling along routes to schools is prioritised.

Critically, enforcement of dangerous and/or illegal parking in cycle lanes and on footpaths must be robust and should have its own strategic response across multiple agencies. Likewise, there needs to be a significant increase in enforcement of HGV bans on roads to improve the safety of vulnerable road users.

Some other factors to consider:

- In urban villages and in the city centre, attention must be paid to quality pedestrian infrastructure, enhancement of public realm and provision of pedestrian crossings.
- Cyclists must be accommodated as road users with infrastructure that is connected and not piecemeal, and drivers must be educated on sharing the road safely and respectfully with other road users.
- The focus of the GDA strategy has to be on the reallocation of road space to facilitate walking and cycling and e mobility first.
- The plan needs to significantly increase the cycling targets beyond 12% and introduce walking targets if we are to reach our climate targets.
- In addition to clear and ambitious targets, it's important to set out clear timelines for active transport and infrastructure projects.
- The plan should prioritise the key cycling schemes that can be developed quickly and will maximise cycling numbers and facilitate the maximum modal shift.
- The plan should establish Safe Routes to School targets for existing schools, rather than just focusing on new schools as the draft plan does.
- Cycling must link in with other modes of transport, with ample accommodation for bikes on train carriages and ample secure, well-lit bike parking at transport interchanges and public transport stations.
- In order to enhance safety and ease of mobility for pedestrians an increased use of zebra and pelican crossings should be considered
- In order to prioritise pedestrians in line with the hierarchy of the street, we should increase pedestrian crossing times at all junctions so that all pedestrians, wheelchair or mobility aid users can cross the road comfortably and safely.
- The plan should set clear targets for pedestrianised streets, particularly in the City Centre.
- The plan should commit to introducing a Car Free day in Dublin City Centre once a month.

- The NTA should consider subsidising active travel sharing schemes (Dublin Bikes, Moby, Bleeper etc.) in suburbs, where currently no sharing schemes exist, prioritising areas of social deprivation first.

Additionally, with so much emphasis this decade on upgrading the bus system, careful consideration must be given to the interplay of bus stops and cycle tracks in order to minimise potential conflicts between passengers and cyclists. Likewise the integration of disability access parking spaces should provide no opportunity for users of those spaces to find themselves navigating a cycle track as they exit or enter their vehicle.

Finally, during the BusConnects consultation process, many people expressed concern that the frequency and speed of busses may present a danger to pedestrians and other vulnerable road users. In many instances these concerns have manifested around pinch points or junctions where heavy volumes of traffic already present a significant danger to other road users, and there is little evidence to suggest that frequent busses would have any more or less impact. However, the opportunity exists to mitigate these concerns with the addition of more and safer pedestrian crossings, and by widening footpaths or introducing traffic calming measures. BusConnects plans should propose wider footpaths, where possible, with crossings and timings designed to ensure that people of all ages and abilities can safely cross the road; and crossings that prioritise pedestrian movement over other forms of transport.

Roads / car use

In the strategy, the NTA makes the following commitment: *“We will put things in place to make the roads safer, for example, speed limits, car-free zones, and the Safe Routes to School programme.”*

We strongly believe this has to happen in conjunction with significantly increased enforcement. The NTA must acknowledge its role in tackling dangerous and illegal parking, and consider a major awareness campaign around the dangers and impacts of inconsiderate parking, ensuring that members of the public come to see this as the anti-social activity it is.

With that said, we welcome suite of measures related to parking and would like to indicate our support for measures like car-free residential developments, public sector car parking reduction and removal from all office locations in Dublin City Centre, and a recommendation that zero car parking be provided for commercial development in Dublin City Centre. We would welcome also that employment development close to major public transport interchanges or Mobility Hubs which seek to provide car parking would be required to demonstrate the necessity for such parking.

Other considerations:

- To accommodate deliveries, we need not just a goods delivery plan for city centre, but for urban villages too, and we need to minimise disruption on key bus routes.
- We must acknowledge the role of park and ride in encouraging a modal shift and long term behaviour change, while in the short term reducing the negative impact of traffic in urban villages and suburbs.
- For the safety of pedestrians and cyclists we should support the move to reduce the default speed limit in the city to 30kmph.

- With benefits for climate, costs and convenience, car sharing schemes have a vital role to play in the development of low traffic or traffic free neighbourhoods and commercial developments.
- Provision to accommodate the government's ambitious goal to get 1m EVs on the road by 2030 should be cognisant of the fact that Electric vehicles, while still much lower emitters than petrol or diesel vehicles, are emissions intensive to produce and dispose of. These emissions are not counted in a tailpipe calculation. The plan, particularly around stated targets for EVs, should demonstrate an awareness of this limitation and encourage private car use as a last resort.
- For those who wish to and do make the switch to an EV, charging infrastructure should be convenient, fast and widely available.

Key considerations

Climate

While the 2021 Climate Act sets a legally binding target of 51% reduction in emissions this decade, we believe this should be regarded as the floor of our ambition, rather than the ceiling. Transport has a critical role to play, particularly in Dublin where there are more alternatives to the private car available. Investments in public transport infrastructure necessarily take time to yield benefits and given the increasing urgency of our climate response, we must look to bring these investments forward so that they their impact on reducing emissions begins sooner and last longer.

We believe there is an overreliance on demand management strategies to bridge the gap to a 51% reduction in emissions in the transport sector. These measures will have a limited impact on emissions if there is not the capacity to absorb journeys onto alternative, sustainable means of transport. Large scale infrastructure projects need to be brought on stream as quickly as possible to ensure there is capacity for displaced car journeys. Supports and incentives also need to be identified to encourage people to use active travel means wherever possible.

Furthermore, while the strategy states: "Fundamental changes are required in the area of transport over the next decade. Central to those changes will be the need to increase the proportion of travel by sustainable modes and reduce the level of usage of petrol/diesel powered vehicles", the strategy overall does not appear to take into account the specific need to halve emissions by 2030. The 2022 to 2030 phase of the strategy is not nearly ambitious enough; and many key projects are not earmarked for delivery until 2040 or beyond.

The strategy further states: "This Transport Strategy is also based on national policies on sustainability including those set out in climate action and low carbon legislation, and in climate action plans", BUT the timeline has too many projects earmarked for delivery decades from now, and crucially with the last decade before Ireland reaches net zero, allowing no time for behaviour change and / or unforeseen delays. For Dublin to play do its fair share in reducing transport emissions, it simply has to happen faster. Additionally:

- The plan needs to be updated to reference the Climate Action Plan 2021, the New National Development Plan 2021 to 2030 and Housing for All.
- Clear modal shift targets need to be set out as part of the plan if we are to reach our climate emissions targets for 2030 and 2050.
- A core focus of the strategy must be on the reallocation of road space to walking, cycling, e mobility and public transport, with specific targets set out.

- The strategy must set out a very clear roadmap as to how this plan will help to reach our 2030 and 2050 climate targets, and set out a year by year path to decarbonisation. The decade ahead is critical and the success or otherwise of the measures in this strategy must be assessed on a continual basis if they are to achieve the desired results. This must be done with a willingness to alter the plan if we fall behind on our path to decarbonisation.
- Another flaw in the strategy is that it only counts emissions at the tailpipe rather than accounting for the total emissions involved in the construction and end of life of the vehicles.

Covid 19

It is vital that the NTA considers the profound impact that the Covid-19 crisis has had on our lives, our communities and how we live and work. While we might see a return to full-capacity on our public transport infrastructure one day, some societal shifts are likely to have longer-lasting impacts on how and when we travel into the city centre.

The overarching design of this strategy is predicated on the need to move large numbers of people quickly and efficiently from an outer radius of Dublin into the city centre, but it's important to note that the shift to remote working will become permanent for many workers, and so too will the move to online retail.

We also must acknowledge that a connected city requires a network of transport options that move people *around* as well as *to* the city. It is a stated objective of the plan that it achieves "Connected Communities and Better Quality of Life - To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.

However, it doesn't seem to acknowledge the need for communities and suburbs to connect to other communities and suburbs. Our city centre may well need to recalibrate to adapt to changing patterns, and so too this strategy should be future-proofed to reflect the latest information available on travel and lifestyle patterns – particularly with regard to census information.

Built Environment, heritage, natural solutions

It is a stated objective of the plan to achieve: An Enhanced Natural and Built Environment - To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, reducing car dependency, and increasing walking, cycling and public transport use.

As it redraws our city, our towns and urban villages, this strategy must seize the opportunity to improve our built and natural environment. The NTA's efforts to minimise tree loss in the revised BusConnects plans are welcome, and additionally we believe landscaping and softening of cycle routes and light rail infrastructure through greening must be central to designs, and efforts to enhance the public realm – making it, cleaner, greener and more people friendly – must be taken at every turn.

The Dublin Tree Strategy recognises the numerous benefits of mature trees to our cityscape, from air quality to amenity value to heritage and placemaking. The NTA must strive to protect every tree possible, and planting schemes should take a holistic approach to biodiversity, with a focus on native varieties suitable for long-term retention, accompanied by pollinator-friendly plants, shrubs and flowers. Likewise, greenways should be green - they should not lead to the unnecessary removal of

trees or established biodiversity-rich planting schemes, and new routes should be greened with the addition of native shrubs and no-mow or wildflower verges.

The Covid crisis has fostered a greater sense of community in many areas, and local access and connectivity has never been more vital. It is essential that every opportunity is taken to improve the public realm and make our villages and communities liveable, walkable, clean, safe places. Public realm improvements should aim to widen footpaths and provide civic spaces and safe cycling infrastructure - not just to enable people to commute by bike into the city centre, but to facilitate safe cycling for people of all ages and abilities in, around and between our communities.

We must take this opportunity to allocate the maximum space possible to people; to design our public spaces inclusively and with The Hierarchy of the Street in mind; and to pave the way for a future where our streets and urban villages are not dominated by cars. To that end, any reallocation of space should also make space for seating areas and parklets, enhanced by biodiverse planting schemes, and public transport hubs should be age-, gender- and disability-proofed; they should provide seating, they should be well lit, welcoming and safe, and in the case of bus shelters they should not impede access to footpaths, and they should face the direction of oncoming buses.

Disability access should be prioritised in any on-street parking plans, and age-friendly parking bays should be introduced to accommodate those with reduced mobility or no access to alternative modes of transport.

Any changes must prioritise the safety and mobility of our most vulnerable street users; they must be inclusive and of a very high quality; and our city's heritage must be recognised and respected. All care must be taken not to turn our urban villages into places to pass through rather than stop in, and above all we must not miss the opportunity to align this strategy with the key objective of the next Dublin City Development: delivering a 15 minute city..

Kind regards,

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