

**Comhar Sustainable Development Council**

**Consultation Submission on the Greater Dublin Area Draft  
Transport Strategy 2011-2030**

**1. Introduction**

Comhar Sustainable Development Council (SDC) welcomes the opportunity to respond to the recently published Greater Dublin Area Draft Transport Strategy 2011-2030.<sup>1</sup> The preparation of this strategy is a welcome initiative and one that Comhar SDC believes has the potential to make a valuable contribution towards sustainable development.

It is clear that transport trends in Ireland from the mid 1990's onwards have not been sustainable. The main problems associated with transport in Ireland are rising pollution – greenhouse gases and particular air pollutants such as nitrous oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs) – and increasing congestion on roads that lengthens journey times, adversely impacts on family and community life, contributes to the growing problem of obesity, and adds to pollution and costs at many levels including affecting our national competitiveness.

The GDA Draft Transport Strategy sets out a process to strengthen and improve transport provision within the region and address some of these problems associated with transport. A hierarchical approach of transport users is adopted with pedestrians, cyclists and public transport users at the top. Key provisions under the strategy include planning for sustainable living; walking and cycling; public transport and roads, freight and travel demand management. Comhar SDC has focused its submission around these key areas as the basis of its consultation response.<sup>2</sup>

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<sup>1</sup> <http://www.2030vision.ie/>

<sup>2</sup> Comhar SDC has made previous recommendations on the need for a sustainable transport system. See <http://www.comharsdc.ie/files/Comhar%20STTAP%20report.pdf>

## **2. General Issues**

Comhar SDC agrees with the approach that has been adopted in the strategy, particularly in relation to the overarching objectives and hierarchy assigned to different transport users. It is important when considering the three overarching objectives of economic, social and environmental wellbeing that they each be given equal weighting and priority attention in the rollout of the strategy.

Generally, transport impacts can be reduced through the good design of policies and measures. A combination of a change in people's behaviour, technological solutions, and some government intervention in the form of planning and infrastructure provision is needed to develop a sustainable transport system. As a guide, priorities for sustainable transport policy can be focused on the five I's:

- Incentives;
- Integration with planning;
- Infrastructure;
- Institutional arrangements;
- Information.

The first two of these – incentives and integration with planning – are key to sustainable transport yet not wholly within the remit of the National Transport Authority. However, transport incentives and fiscal measures are needed to deliver behavioural change and also to provide a source of revenue for investments in transport services and infrastructure. Efficient institutional arrangements are needed to ensure that policies can be implemented effectively and at least cost, while information helps us measure our performance and informs us of the consequences of our actions.

At the same time, it is important that the strategy acknowledges and addresses the need for policy coherence. This includes considering how the provisions of the strategy integrate with other government programmes and strategies at a national level and with existing or proposed transport measures at an EU-wide level.<sup>3</sup> Transport outcomes are by their nature cross-cutting and as a result are determined by policies, plans and programmes in many different areas including in relation to energy, planning and health.

## **3. Planning for Sustainable Living**

An overarching goal of sustainable development is to improve our quality of life and developing sustainable communities is one way in which this can be achieved. Developing sustainable communities requires a planning system that integrates policy considerations relating to land use, development and settlement

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<sup>3</sup> For example, the EC White Paper on Transport (2011) sets out a roadmap for the sector and includes a number of key measures and targets that are applicable to all Member States.

patterns, the natural environment and public and private investment in essential infrastructure. This involves bringing together the location of houses, amenities (such as schools and community facilities), shops, water services, communications, employment and transport in a given area and in the right way which is beneficial for peoples' quality of life and to combat social exclusion. Therefore, the integration of land use and planning into transport decision-making is critical in the development of a viable and sustainable transport strategy whose vision is for a *“competitive, sustainable city-region with a good quality of life for all.”*

Poor planning without heed to transport requirements has created much of the residential sprawl throughout Ireland and led to car dependency. Land use and planning must be aligned with the National Spatial Strategy and integrated into transport decision-making and vice-versa. This may require reform of institutions related to transport so that land use and transport planners work more closely together. The inclusion in the Dublin Transport Authority Act 2008 of provisions for better integration of planning and transport policy is an important development in this regard as better planning can have a significant impact in reducing transport needs in the longer term.

Comhar SDC has made previous recommendations on transport and planning in the Greater Dublin Area.<sup>4</sup> Some examples of specific suggestions for Planners include:

- Concentrate shopping in locations with high accessibility, i.e. near settlement business centres;
- Restrict further growth of satellite settlements;
- Ensure maximum within-settlement accessibility by non-motorised transport modes;
- Plan mixed-use multi node settlements;
- Focus growth within gateways, hubs and designated growth towns.

#### **4. Walking and Cycling**

Comhar SDC has also made previous recommendations suggesting ways that national policy could be improved to facilitate a much greater role for cycling and walking in Irish transport. Although many of these recommendations focus on cycling, the interests of cyclists and pedestrians usually overlap so the recommendations for cycling, if implemented, will also benefit pedestrians.

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<sup>4</sup> Comhar SDC (2009), *Submission to the Regional Planning Guidelines 2010-2022 for the Greater Dublin Area*. See [http://www.comharsdc.ie/files/2009-03-30\\_RegionalGuidelinesGDA\\_doc.doc](http://www.comharsdc.ie/files/2009-03-30_RegionalGuidelinesGDA_doc.doc)

## **(i) Policy framework**

Cycling policy is a dynamic process and depends on many mutually supporting components. For example, the provision of bicycle-friendly infrastructure is important but it will not be sufficient on its own to realise the potential role of cycling. Experience from countries that have reversed negative cycling trends shows that countries with well developed, comprehensive cycling policies are more likely to increase their cycling numbers. These integrated policies typically feature the provision of separate cycling facilities along heavily travelled roads and at intersections; traffic calming of most residential neighbourhoods; extensive cycling rights of way complemented by ample bike parking; full integration of cycling with public transport; comprehensive traffic education and training of both cyclists and motorists; and a wide range of promotional events intended to generate enthusiasm and wide public support for cycling.

### *National policy*

At the national level, transport policy has now begun to acknowledge the many benefits of cycling through a new National Cycle Planning Policy Framework. It is important that there be an alignment of the activities of other bodies (e.g. Irish Rail etc.) with the needs of cyclists to ensure that obstacles, once identified, will be removed. Legislative changes may be necessary, particularly a reversal of the mandatory use of cycle paths.

### *Local policy*

At local-authority level a valuable approach is outlined in the BYPAD audit methodology, which has been developed as part of an EU-funded project and implemented in several Irish local authorities.<sup>5</sup> The BYPAD audit assesses the effectiveness of existing local authority cycling policies, identifies steps that can be taken and provides for a follow-up assessment of the effectiveness of new policies. The BYPAD audit in Ireland found that local authorities in Ireland take at most an “ad-hoc approach” to cycling policy development, which is characterised by low and irregular attention to the needs of cyclists, a lack of personnel working on cycling or trained to deal with the needs of cyclists, and informal structures causing outcomes to be dependent entirely on the individual commitment of staff members. Instead, local authorities need to move to either a “system-oriented approach”, characterised by long-term planning, the systematic taking into account of user needs, high quality data on which cycling policy is based, sufficient budget allocations and formal partnerships between cycling officials and other partners (e.g. schools, employers). The rollout of initiatives such as the Dublin Bikes scheme organised by Dublin City Council is a positive development and demonstrates what is achievable in this area in terms of raising the profile of cyclist travel.

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<sup>5</sup> [http://www.bypad.org/cms\\_site.phtml?id=552&sprache=en](http://www.bypad.org/cms_site.phtml?id=552&sprache=en)

## **(ii) Political leadership**

Underlying many of the obstacles to date has been a lack of political commitment to cycling and walking. The reasons for this lack of political attention may relate to the fact that cycling is often perceived as a fringe activity. Given that many obstacles exist to prevent cycling from becoming more mainstreamed, a strong political commitment will be necessary to ensure that measures identified are prioritised and implemented.

### *Government as champion*

The importance for political will to effect change has been shown through the example of the plastic bag tax and the smoking ban in the workplace, showing how a clear and thought-through policy driven by strong political will can bring about a significant change in public attitudes and behaviour. Given the benefits to cycling and walking not just for those users but also for all other road users and members of society (e.g. through reduced congestion and pollution), there should be adequate incentive to implement even measures that might be unpopular in the short term. Indeed, the example of other European countries is that it is not enough to implement pro-bicycle policies but it is also essential to make car use less convenient. The Netherlands, Denmark, and Germany make driving expensive as well as inconvenient in central cities through a host of taxes and restrictions on car ownership, use, and parking, and strict land use policies foster compact, mixed-use developments that generate shorter and thus more bicycle-friendly trips.

### *Setting of targets*

The National Cycle Planning Policy Framework has set a target that by 2020, 10% of all commuting trips will be taken by bike. Strong political commitment and a willingness to incentivise bicycle use, as has been done in other European countries, will be needed in order to meet this target. By way of comparison, Copenhagen has set a target for 50% of all urban trips by bicycle which is far beyond what might be imagined feasible for Dublin, but it is considered possible by a city that shares many characteristics with Dublin.

### *The role of the public sector*

Public organisations should also play a more direct leadership role. Public initiatives like the annual car-free day receive indifferent support from the very agencies that could be championing them. Although civil servants take their lead from the political process, there is much potential for the public sector to improve the environment through its own operations and the example it sets. The launch of Bike Week is a welcome development and a useful forum for fostering and demonstrating this type of leadership role.

### **(iii) Infrastructure**

The infrastructure in Ireland is often not conducive to cycling or walking. Cycling-specific infrastructure such as cycle lanes is often inadequate, incomplete or sub-standard, as evidenced by cycle lanes that are poorly maintained or result in the loss of cyclists' right of way on a road. Many roads especially in urban areas are crowded and cyclists are forced into unhealthy competition for road space with motorists, who in turn share scarce road space with taxi drivers, delivery vans and waste trucks. Many centres of cities are heavily used by pedestrians despite the lack of areas closed to non-motorised traffic, but city-centre junctions seem to be designed to maximize traffic throughput rather than to encourage pedestrian use. Low-density urban planning means that walking to school or work is impractical for many people. In rural areas roads are often too narrow or without footpaths, which means that there is higher risk of accidents and parents are reluctant to encourage their children to cycle or walk to schools even when they are close by.

#### *Bicycle-friendly infrastructure*

Often the policy debate focuses on the absence or quality of bicycling infrastructure, e.g. cycle paths, parking facilities. The problem should not be seen as one of providing or upgrading bicycle infrastructure, however, but rather of providing bicycle-friendly infrastructure. This is an important distinction, because as long as infrastructure like roads is constructed without taking into account the needs of all road users, including pedestrians and cyclists, these modes will be marginalised.

#### *Shared spaces*

A solution must lie in a more rational redistribution of road space among its users. Although motor traffic dominates Irish transport, it is often not the most efficient use of scarce road space, e.g. during periods of congestion. This principle, which is recognised by the limited pedestrianisation of certain Irish streets, should be extended to the further curtailment of private motor cars in urban areas, either by increased pedestrianisation or by increasing the breadth of road space to non-motorised transport modes. On-street car parking is often a wasteful use of scarce road space, and this space should often be given over instead to wider footpaths, cycle paths or bicycle parking spaces. Sharing can also be temporal: giving over use of road space to certain modes at certain times can accommodate different modes in a more positive way. The pedestrianisation of Grafton Street except for the delivery period of 06.00-11.00 is a successful example of temporal sharing and this principle should be extended wherever possible, e.g. through the pedestrianisation of major thoroughfares like Dame Street in central Dublin on weekends. Ireland should adopt the best practices of other European countries where cyclists are permitted into at least some pedestrian zones, with priority and right of way given to the pedestrian.

### *Greenways*

A more ambitious approach would be to curtail the amount of road space available to the private motor car throughout urban areas and the provision instead of high-quality dedicated routes that are for the exclusive use of non-motorised transport. These “greenways” could have the potential to recruit large numbers of cyclists and pedestrians, especially cyclists who might otherwise be discouraged by the perceived risks of cycling. The Sutton-to-Sandycove greenway project will provide not just a recreational resource along its 22-km route but also a potential commuting route that is entirely safe to use because of the absence of motor vehicles. If the Sutton-to-Sandycove greenway is successful, the greenway model should be extended to other parts of Dublin and eventually to all Irish cities and towns. Under this scenario, routes would be identified that thread through the whole city and the roads redesigned as necessary to provide an uninterrupted route of at least 3 metres width, segregated from motor traffic and providing a peaceful and beautiful route along major arteries.

### *Appraisals*

The appraisal of infrastructure should be broadened to take into account social costs and benefits, especially those relating to carbon emissions and health impacts. In this way, the apparent costs and benefits of including the needs of cyclists and pedestrians in infrastructure spending decisions would be taken into account. Including impacts not traditionally featured in cost-benefit analyses like journey ambience (environmental quality and lack of danger from motorised traffic) and the benefits of physical activity for health can be very significant for cycling and walking schemes.

## **5. Public Transport**

Improved public transport can help to move commuters from private cars to buses, thus reducing congestion to the benefit of other road-users, as well as having potentially favourable impacts on emissions. Public transport is also an important component of sustainable communities. As commuter areas expand, public transport must be provided to serve mobility needs and provide an alternative to individual car transport.

Bus and rail services should provide services driven by demand and social policy. In areas where the demand is low in numbers but socially important, then services should be adjusted accordingly and may require subsidy if it is judged necessary. It is necessary to make public transport more attractive. Integrated ticketing has been discussed for the GDA since the mid 1980's; it should be implemented as soon as possible, i.e. immediately. Real-time information on bus routes would also improve the reliability and attractiveness of bus services.

Comhar SDC has made previous recommendations on the need for sustainable transport in rural areas.<sup>6</sup> The Rural Transport Programme (RTP) currently provides funding for community-based groups for local transport services. The main objective until now for the scheme was to provide transport services to socially-excluded groups rather than the provision of transport to those travelling on a regular, even daily basis to their place of work. Therefore the scope of the programme is limited and is not intended to compete with commercial services nor does it cover all geographical areas.

Some of the main recommendations from the Comhar SDC report on rural transport include:

- Need to improve information and awareness of existing services in rural areas and provide updated timetables;
- Need for rural proofing of policies outside the direct remit of transport to ensure they don't undermine the sustainability of rural transport;
- Better integration required of public transport services in rural areas;
- Mandatory use of *Workplace Travel Plans* for places of employment in rural areas;
- More research to address the lack of data available on rural transport;
- Create an even playing field and fair competition for different and competing transport providers;
- Increase the funding or expand the remit of the RTP;
- Use of fiscal measures where required to address the unsustainable travel patterns of existing trends in rural areas.

## **6. Roads, freight and travel demand management**

### **Road transport**

All new roads projects that take place, and also major improvements of existing roads, should assess the needs of cyclists and pedestrians and make provision for both cycle lanes and footpaths, where appropriate. This will not only help to support these more sustainable forms of transport, but add to their safety. Review is also needed of the amount and design of motorways under construction or planned. In particular optimisation of the use of existing motorways should be prioritised over building new motorways.

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<sup>6</sup>Comhar SDC (2009), *Towards a Sustainable Rural Transport Policy*. Available at: [http://www.comharsdc.ie/files/Final%20Rural%20Transport%20Report\\_Website%20Version.pdf](http://www.comharsdc.ie/files/Final%20Rural%20Transport%20Report_Website%20Version.pdf)



Ecodriving training for private and commercial drivers should be obligatory at the time of first licensing. Ecodriving is a low cost policy measure to reduce CO<sub>2</sub> emissions from transport. When marginal abatement cost (MAC) curves for the transport sector are compared, it can be seen that ecodriving initiatives can have negative costs to society, thus making it an attractive alternative in a sector with relatively high abatement costs compared with other sectors.

## **Freight transport**

Fuel consumption by road freight transport is estimated to have increased by 250% over the period 1990-2008, while GDP grew by 182%.<sup>7</sup> Over the same period rail freight has declined significantly. Freight transport has remained a somewhat neglected policy area and has become increasingly a major source of greenhouse gas emissions in Ireland. While road transport will probably remain the dominant mode of transport for freight, a national freight transport policy could make a significant difference to the sustainability of the sector.

A national distribution centre outside Dublin is required for freight transport. One of the significant barriers to freight transport optimisation is the number of small operators in Ireland leading to inefficiencies in logistics. There is evidence of many cases of trucks driving empty because they have no return journey load. It is difficult to coordinate the deliveries of multiple operators without a central facility available to do so. Also economies of scale are necessary to justify more expensive transport infrastructure such as rail freight. Unfortunately this is a classic case of public good theory – although everyone would stand to gain from such a facility, there is no incentive for any one agent to organise it for everyone else. Government intervention in the form of human and financial resources is necessary to put a freight distribution centre in place and run it. The great advantage of such a facility would be that once a central distribution location were established, other transport infrastructure, such as rail freight, could be organised around it and small operators could collaborate to ensure optimisation of deliveries.

Comhar SDC has made previous recommendations for moving Dublin Port out of the city, as while there appear to be certain barriers to the relocation, there are also expected net gains in the long term which are aligned with a more ambitious longer-term vision for Dublin city. Examples of successful implementations of similar schemes are seen in the move of Helsinki Port to Vuosaari and the redevelopment of the docklands in Hamburg and Bilbao. Other options that have been put forward for Dublin Port include expanding the existing facilities and providing alternative location(s) to assist in meeting future demand.<sup>8</sup> Each of these options has its own relative merits that need to be considered based on their projected environmental, social and economic impact.

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<sup>7</sup> Sustainable Energy Authority of Ireland (2009), *Energy in Transport – 2009 Report*

<sup>8</sup> Department of Transport (2009), *Dublin Port National Development Plan Study*

There are clear social benefits associated with rail freight in comparison with road freight. The development of rail freight in appropriate areas should be financially supported with public money (from transport fiscal measures) if the benefits outweigh the costs from a societal perspective. Innovative solutions using existing infrastructure such as Luas lines at night for freight are possible options that should be given consideration.

## **Travel demand management**

### *Workplace Travel Plans*

All firms with a large number of employees should be obliged to provide workplace travel plans. Workplace travel plans work by focusing on the user at the centre of trip generation to induce travel behaviour change within the existing transport context. Workplace travel plans can be used to address multiple challenges facing businesses such as a scarcity of employee parking, a lack of accessibility due to congestion, lack of space forcing land acquisition, and a difficulty in encouraging employees to travel with other modes of transport than cars. There should be a central service in each city providing support to firms and people not working for big firms. The UK, Austria, the Netherlands, Sweden, Switzerland, Germany and France are good examples of best practice in Europe in mobility management and policy.

### *Fiscal Instruments*

It is well-established that to reduce Irish transport impacts, there will need to be a radical change in people's behaviour. Consumers need guidance in the form of pricing to make the right decisions in their daily lives when purchasing goods and their transport choices. Regulations can force manufacturers to produce efficient vehicles but if they are not priced in a way favourable to the models causing less harm to the environment then there may be no incentive for their purchase.

In an ideal world, the economics literature recommends that pollution charges be used to reduce pollution. In the case of transport this would mean charging the social marginal cost per kilometre travelled. While transport users already pay a combination of taxes and charges on transport, the EU research project TRENEN II has shown that in general in Europe the social marginal costs of a trip into a city by car are higher than the costs generally paid in fuel costs, parking charges, and congestion tolls.<sup>9</sup> This shows that for many trips, drivers are not paying for the externalities they generate by driving. In the past the technology was not available to measure emissions in real time and to register vehicles usage and therefore it was impractical to levy a charge based on the direct impacts of transport per kilometre. As technology has improved however it has become a real possibility to do this and several countries are currently or are in the process of implementing a user charging scheme.

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<sup>9</sup> <http://www.econ.kuleuven.be/ete/research/models/trenen2.htm>

A national scheme of road user charges can internalise all externalities associated with transport in a fair manner and has the advantage that congestion is addressed as well as environmental damage. Compared with the option to introduce congestion charges in major urban areas only, the full roll-out of a national road pricing scheme has a similar technological requirement and is the logical extension of such an instrument, with the advantage that all transport emissions are covered .

Under such a scheme, all transport fixed charges such as vehicle taxes should be removed and converted to distance-based road charges which should vary according to vehicle emissions, geographical location, and time-of day. This will encourage consumers to purchase more fuel-efficient, clean vehicles and to drive less, and it will furthermore ensure that when they do take to the road, they can move smoothly, safely and efficiently. The design of the scheme should be made as simple as possible and stakeholder buy-in is crucial at the design stage of the scheme to reduce resistance to its implementation. In recent years the technology required to operate national road pricing has become more accessible and should be widely available within five years. The revenue collected through such a scheme should be sufficient to offset the revenue shortfall from vehicle taxes. It should be earmarked for transport infrastructure investment and to alleviate any distributional impacts thus making road pricing more acceptable to the public and providing a real choice of travel options.

The Netherlands has recently passed legislation approving the phased introduction of a national road pricing scheme with popular support. The Dutch experience in developing such a scheme shows the necessity for a lengthy preparatory period to study the most suitable scheme design, raise public awareness and obtain the stakeholder buy-in that is needed for legislative approval of a national road pricing scheme. We need to begin similar preparatory work in Ireland as there will be significant lead-in time for the implementation of such a scheme. A feasibility study of a national road pricing scheme should be commenced immediately to investigate the potential strengths and weaknesses of such a scheme as applied in Ireland.

Another fiscal measure that should be considered is intelligent parking pricing. Parking pricing has been shown to be quite effective in deterring people from driving in urban settings; it has been stated that the largest contributing factor to drivers choosing to take the bus into the centre of a city is if parking were relatively unavailable or expensive<sup>10</sup>. The removal of on-street parking can be effective both as a deterrent to city-centre driving and also in creating further road space for other uses such as cycling. However, parking pricing does not

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<sup>10</sup> UK Department of Transport (2002) "Attitudes to Local Bus Services". Available at: <http://webarchive.nationalarchives.gov.uk/+/http://www.dft.gov.uk/pgr/statistics/datatablespublications/trsnstatsatt/earlierreports/attitudetolocalbusservices>

affect “through traffic” and therefore can have only limited impact on congestion within urban areas.

## **7. Summary**

The development of the Greater Dublin Area Draft Transport Strategy 2011-2030 is a welcome and significant initiative. The population of the GDA in 2006 accounted for around 39% of the State’s population and so the region has a key role to play in terms of overall transport policy development for the country’s inhabitants. It is critical that this strategy learns from the mistakes of the past and results in a transport policy that is sustainable and provides a good quality of life for all concerned.

Comhar SDC welcomes many of the measures contained in the strategy and also the hierarchal approach of transport users which has been adopted. It is important that as many of these measures as possible get implemented within a reasonable timeframe. Our submission has highlighted some of the areas and policies that should be prioritised and we look forward to working with the NTA over the course of the strategy as part of the ongoing consultative process with stakeholders.