

A member of:



The Member for Ireland of:



Dublin Cycling Campaign  
c/o The Tailor's Hall,  
Back Lane,  
Dublin 8.

E: [Damien.otuama@antaisce.org](mailto:Damien.otuama@antaisce.org)  
T: 01-7077064  
M: +353-87-2840799

National Transport Authority,  
Dún Scéine,  
Iveagh Court,  
Harcourt Lane,  
Dublin 2,  
D02 WT20.

Friday, 13 November 2015

## Transport Strategy Consultation

Dear Sir/Madam,

Dublin Cycling Campaign, a lead member of Cyclist.ie – the Irish Cycling Advocacy Network, welcomes the opportunity to make a submission on this important transport strategy process, which should ideally lead to better and more sustainable regional mobility. Dublin Cycling Campaign wishes to associate ourselves with the pre-consultation document – see attached – submitted by An Taisce earlier this year. We endorse the basic principles and proposals as outlined in that document.

We submit the following specific comments in relation to the draft strategy as presented.

Within **Chapter 3**, which outlines the broad principles for the Strategy we make the following points:

- We agree with the sentiments of Section 3.2.4 in relation to growth in cycling numbers and the 'sub-optimal development' of plans over recent years. We wish to highlight also other 'sub-optimal' dimensions such as the incredibly poor enforcement standards in

regard to ensuring that cycle-lanes and tracks *are not parked on* by drivers or ensuring that *there is not overly close overtaking of cyclists* on the roads as is increasingly common. While this goes beyond 'infrastructure provision', it is crucial that the NTA strategy acknowledges the need for a holistic approach to generating safe cycling conditions (as set out on the National Cycle Policy Framework) – this needs to include other driver changes such as safe overtaking. We would like to see, for example, all local authority vehicles in the GDA to display the signs that the vehicles of Wexford County Council now display, as shown below. While crucial, it's not just about infrastructure! Overall, in regard to cycling we look forward to a greatly increased and accelerated development within the time-span of the next implementation plan



- We agree entirely with the statements of Section 3.2.5 in relation to pedestrian provision, but wish to see a specific reference here to the development of a strategic 'Public Realm design' approach within this context. A major omission in this section is the need to promote 30kph as the default urban speed limit – not just to make the roads safer, but also to make them living and convivial environments.
- We are disappointed with the significant change in emphasis from the original 2011-2030 Strategy suggested in Section 3.2.6 in relation to roads development. The 2011 Strategy outlined clearly in Section 11.1.2 that, '*in general there will be a clear presumption against development of new road proposals unless required to address issues such as safety concerns, provision of space for public transport priority or local servicing of development lands that meet strategy planning objectives*'. The present draft strategy states in Section 3.2.6 that there are '*locations (where) car travel will continue to be the dominant mode of travel and investment in the road network will be an ongoing requirement*'. We contend that the statement from the 2011 Strategy above must be re-inserted, to ensure that any proposals are assessed under the criteria outlined.
- We note the broad considerations of the present GDA Strategy as set out in Section 3.6 of the report, but do not understand why the specific consideration of Climate Change targets has not been included. Any increase in motorised transport levels will increase carbon emissions, and reduce our ability to meet agreed climate change targets. The broader point here is that the GDA Strategy fails to engage properly with the urgency for the transport sector – and hence traffic/transport movements in the GDA - to radically

reduce emissions in line with what is required (as per IPCC discussions) to prevent the average global temperatures from rising more than 2 degrees above pre-industrial levels.

- We note the commitment to developing the GDA Cycle Network, but would welcome a further emphasis on a specific level of funding for cycling and walking, active travel, as is made in other countries. Further, it is essential that the plan is front-loaded towards investing in cycling / cycling friendly schemes.

In relation to **Chapter 4** 'Development of the Strategy' we make the following points related to the various corridor proposals:

- **Corridor A** – we fundamentally disagree with the proposal to develop a 'hodge podge' Metro Link to Dublin Airport and Swords, when other more realistic and better long term proposals for Dublin City are more worthy of consideration. We fail to understand that no rigorous assessment appears to have been conducted on the 'Metro Dublin' proposal – outline attached. This could possibly be a more long term solution for public transport in Dublin.

Clarification needs to be given on the statement in relation to Swords BRT, that it will be 'a BRT type service, or a conventional QBC type upgrade along the route or parts of the route' (!?). QBCs are not the future for sustainable city transport as they are regularly abused by motorists, clogged with taxis and cause continued problems for cyclists! Following a consultation process initiated last year, it might be expected that a full BRT proposal would be close to final design stage. Clarity is required.

As in other areas we cannot see the justification for a further distributor road around Swords, which is already overloaded with bypasses. We need to see specific demand management initiatives in this area instead!

- **Corridor B** – We disagree with the proposed capacity increase on N3, unless it is specifically related to public transport access. This, similar to other proposals on other corridors, will merely feed into congestion increases in Dublin City and hence increased carbon emissions.

The issue of a Slane bypass has been discussed ad infinitum and An Bord Pleanála rejected a previous plan. Once again alternative movement of freight along this N2 axis needs to be re-assessed. There is no demonstration of any new thinking on this issue in the Strategy.

- **Corridor C** – We are generally in favour of public transport improvements along the N4 corridor, but rigorous cost-benefit assessments and multi-criteria analyses need to be applied.
- **Corridor D** – We fundamentally oppose the proposed upgrade of the M7 to 3 lanes, unless it is specifically related to public transport. This proposal will merely feed into congestion increases in Dublin City and increased carbon emissions, and destroy any city plans for improved active mobility.
- **Corridor E** – We note and support the increased bus capacity on the N81 and the proposed Tallaght/Rathfarnham BRT proposal.

- **Corridor F** – We support the inclusion of the vital DART underground link, which enables the development of an all-Ireland rail network, and a major contribution to Dublin City commuting.

We also support the upgrading of the other public transport options in this corridor, but note the omission of the target originally included in the 2011-2030 Strategy to 'seek the closure of level crossings north of Bray'. This needs to be clarified, and should remain a target.

Comments on **Chapter 5** 'The 2035 Transport Network'

- **Sect 5.2 Heavy Rail** – We support the rail upgrade proposals but note the omission of specific secure bike parking at stations as specifically proposed in 2011-2030 Strategy. This needs to be stated explicitly from the start.
- **Sect 5.3 Light Rail** – As stated above we fail to see the logic of the Metro North light rail proposal to Dublin Airport in comparison to other options. We suggest a comprehensive re-assessment of this proposal.
- **Sect 5.5 Bus Network** – The development of a comprehensive and modern bus network is critical to the overall Strategy. We stress the need for the modern bus fleet to move away from being diesel powered for public health reasons.
- **Sect 5.6 Cycling** – We are supportive of the broad proposals in relation to the development of the GDA cycle network, but are apprehensive about the level of financial commitment to its development, as shown in the past 5 years 'sub-optimal development'.

**Cycling investment gives the highest rate of return of all forms of transport investment, and for relatively modest investment levels. This needs to be recognised, promoted, and acted upon.**

- It is critical that the proposed network encourages more cycling and is safer than the existing mainly on-road system. We therefore welcome the statement that in 'Recognising the need for a safe cycling network, it is intended that many of the key cycling routes will be developed as segregated facilities'. And as shown with the recent development of the Grand Canal Cycleway, it is essential that such high quality segregated routes are created by removing general traffic lanes and/or long lines of car parking bays.
- We welcome the commitment to 'expand cycle training', but note there is no mention of a link to the developing 'Cycle Right - National Cycling Safety Standards', being coordinated through DTTAS and Cycling Ireland, and with the support of Cyclist.ie.
- We are disappointed that there is no specific mention of any proposed improvement in the 'time plating' for cycle lanes, which is a major deterrent to cyclists, and a barrier to all-day city cycling. While this may seem like a small detail, it is the summation of the multiple small interventions for cyclists that gives rise to a cycling friendly city!
- The omission of any reference in this section (and other sections), to the development of lower speed (30kph) zones is a major fault. The contribution of lower speed limits to an increase in active travel is well documented, in particular in areas of high potential usage.



- We welcome the commitment to education/information on cycling and Dublin Cycling Campaign, which has been in at forefront of cycle promotion initiatives in Dublin, is happy to support this commitment. In this context the contribution of increased cycling levels to improved community health needs to be highlighted.

- We particularly welcome the proposal to ‘Cooperate with other agencies in the enforcement of laws in relation to parking on cycle lanes and cycle tracks’. Dublin Cycling Campaign has been actively working on a social media campaign #freethecyc lanes which has highlighted the very frequent transgressions in this area without any apparent enforcement. The situation below, photo-graphed recently in Rathmines is typical.



- **Sect 5.7 Walking** – the importance of walking in the context of transport, particularly in urban areas cannot be over-emphasised, as well as making a major contribution to improved health statistics. More priority needs to be given to encourage greater walking levels. We welcome much of the emphasis in this section, but note no specific mention of reduced speed limits in areas of high pedestrian activity, and not just residential areas. We specifically welcome the mention of improved pedestrian crossings and reduced waiting times. Furthermore we would like to see a cultural change whereby all traffic engineers working on urban road schemes are required to walk along the city’s paths pushing buggies or using wheel-chairs for a day to get a real sense of how ridiculously narrow and cluttered so many of the city’s paths are.
- **Sect 5.8.1 and 5.8.2 - Roads**  
We have particular issues with the majority of proposals in relation to the proposed road upgrades, which can only lead to increased use of private transport, and thus greater congestion, and increases in carbon emissions. Unless these upgrades are specifically related to public transport improvements and include restrictions on private car use through some forms of demand management, they should not be considered. The specific meaning behind the terms used, such as ‘reconfiguration’, ‘upgrading’ and ‘capacity improvements’ need to be spelt out. The proposals outlined are a recipe for future climate change disaster, massive congestion increases and an obese population!
- **Sect 5.8.3 Principles** - Once again we deplore the weakening in emphasis from the 2011-2030 Strategy that *‘in general there will be a clear presumption against development of new road proposals’*. These latest Strategy principles roll back significantly on the previous commitment, and go against best international practice.

Use of the word 'significant' throughout this section is a symptom of empty rhetoric, and not acceptable without a clear definition of its meaning and effect on actual strategy.

- **Sect 5.8.4 Freight – transport of freight is critical for growth of the economy, and** we support the broad measures outlined here. We particularly welcome a commitment to assess other GDA urban areas for HGV management measures, and for the expansion of the current Dublin City ban to other vehicle types.

We are however a little underwhelmed by the statement “While movement of freight by rail will continue to be supported and encouraged, the Strategy has to address the reality that most freight movement will be by road.” The purpose of a strategy *is to reshape reality* and develop an alternative vision in the face of a shifting landscape of climate change and the domination of streets by over-sized HGV's. A little more ambition and vision would be appreciated here!

In regard to the final point here – “Support the introduction of low impact delivery schemes in Dublin City Centre and other town centres, for example, by using smaller, quieter and lower emissions vehicles” – we recommend that the term 'cycle logistics' is introduced here to reflect what the more progressive cities such as those in Sweden are doing for urban freight movement. See also: <http://federation.cyclelogistics.eu/>



- **Sect 5.9 Demand Management** – We are in broad agreement with the principles of demand management outlined.
- **Sect 5.10 Park & Ride** – The development of critically situated Park & Ride sites is to be welcomed, but we suggest consideration of further sites at Tallaght on the N81 and closer to Naas on the N7

I would be grateful if you send an acknowledgement for this submission.

Yours faithfully,

Damien

Dr. Damien Ó Tuama  
National Cycling Coordinator  
Cyclist.ie – the Irish Cycling Advocacy Network and An Taisce