

Transport Strategy for the Greater Dublin Area 2016—2035

Consultation Submissions Report

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Part A: Overview

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The Draft Transport Strategy was put on public display for a period of 4 weeks from the 15th October to the 13th November, in accordance with Section 12 (8) of the Dublin Transport Authority Act, 2008 and Section 13 (1) of S.I. 435 European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004. Copies were placed in the reception of the Authority's office and the report was available for downloading from the Authority's website. The Draft Strategy was accompanied by an Environmental Report, a Natura Impact Statement, and a number of background technical reports.

An advertisement was placed in the Irish Independent on the 14th October inviting interested parties to make a written submission relating to the content of the Draft Transport Strategy. Submissions could be made by post; by email; by using a form on the Authority's website; or directly in the reception of the Authority's offices.

There were 155 submissions received, ranging from personal submissions from residents and commuters living in the GDA to detailed proposals from government departments and local authorities. The breakdown of the submissions is set out in Table 1 below.

Table 1: Breakdown of submissions by category

Category	Number	Percentage
Public Body	10	6%
Private Business	17	11%
Private Developers	8	5%
Political Party	2	1%
Councillors and TDs	17	11%
Government Departments and Local Authorities	11	7%
Professional Bodies and Campaign Groups	15	10%
Individuals and Residents' Groups	66	43%
Transport Operators	2	1%
Universities and Colleges	7	5%
Total	155	100%

Some of the issues raised were focused on localised changes arising from the implementation of the strategy, like the impact of closing specific level crossings along the Maynooth line, or on single issues, such as the omission from the plan of a rail link to Navan. Other submissions covered a plethora of issues, ranging from the proposals for cycle infrastructure, the proposed Bus Rapid Transit and how best to utilise the expanded heavy rail network. Some submissions also offered alternative visions as to how the strategy should be developed, with an array of different proposals other than those set out in the draft Strategy.

On review of the submissions, it is reasonable to state that they represent a wide spectrum of interested parties.

The next section sets out a summary of the points raised in each submission and commentary on the issues, including when required, recommendations for amendments to the Strategy. The proposed amendments are set out in the final section of this report.

Part B: Review of Submissions

Part B: Review of Submissions

Submission No. 1

Name: Paul Gorry

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Taxi regulation issues raised and concern for public safety and lack of enforcement;
- Concern expressed over frequency and price of bus services, and that the NTA has no plans to improve services;
- Bus link between Leixlip, Maynooth, Celbridge and Lucan needed; and
- Underground link needs to be developed with more trains from Maynooth to Bray; these services should be listed in timetable.

Commentary / Response:

There is extensive enforcement of taxi regulation by the Authority's own compliance staff in addition to actions by the Gardai.

The draft transport strategy (Section 6.1) sets out proposals increasing bus services to match capacity with growing passenger demand.

The draft transport strategy includes for the development of the DART Expansion Programme, which will provide a DART connection from Maynooth to Bray.

Submission No. 2

Name: John Howell

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Reopen Dunleer Station on the Dublin to Belfast line;
- Increase the frequency of trains on the Dublin to Belfast corridor and reduce the number of stops between Drogheda and Dublin; and
- Annual toll passes should be introduced.

Commentary / Response:

Dunleer is outside of the Greater Dublin Area and, therefore, is outside the scope of this transport strategy.

The Northern Line from Dublin to Drogheda will be electrified as part of the DART Expansion Programme. That will allow more frequent services to be introduced on this line. The exact stopping arrangements of individual services will be developed as part of the operational timetable at the relevant time.

The issue of annual toll passes is an operational matter for Transport Infrastructure Ireland (formerly the National Roads Authority).

Submission No. 3

Name: Eugenia Thompson

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Dedicated Incident Support / Garda Unit should be in place on the M50 during peak traffic periods.

Commentary / Response:

While this is an operational issue for An Garda Síochána and Transport Infrastructure Ireland (formerly the National Roads Authority), the draft transport strategy acknowledges in Section 6.10 the role of effective enforcement and commits to co-ordination and cooperation with An Garda Síochána in relation to enforcement and traffic management .

Submission No. 4

Name: John Dunne

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposes a “National Network of Private Hire Services” under the auspices of ibus plc, which would see hubs acting as collector points for wider bus services, to link to with the overall Network. It would provide for interchange at locations such as Naas whereby services would interchange and provide direct links to Dublin. Proposal is for national coverage, to operate on a commercial basis. Each hub would also have significant numbers of car-parking spaces, which would enable park and ride using the direct link to Dublin.

Commentary / Response:

There is nothing in the draft transport strategy that would preclude private operators from seeking licences to operate such commercial services. Section 5.10 of the draft transport strategy sets out the Authority’s policy on the development of Park and Ride facilities, and the intention that the Authority will:

- *“Assess and determine the potential for bus-based park and ride, in particular close to high quality road corridors leading from Hinterland towns, with good bus priority to commuter destinations in the Metropolitan Area”.*

The work carried out in preparing the strategy does suggest that it is challenging to provide successful bus-based park and ride facilities at a considerable distance from urban centres.

In relation to the transport interchange element of the proposal, the draft transport strategy does include objectives in section 6.6 (Optimising Interchange and Transport Facilities) to:

- *“Provide high quality passenger interchange points, which facilitate convenient transfer between public transport services, in various town centres throughout the region and at key transport locations in the Dublin Metropolitan Area, such as St. Stephen’s Green, Westmoreland Street/D’Olier Street, Tallaght and Blanchardstown”;*
- *“Ensure that such transport interchanges are developed in a manner where service schedules are optimally coordinated, where distances between connections are minimised to the extent practicable, where good directional signage for connections is provided and where necessary operating facilities are provided to facilitate connectivity”.*

The draft transport strategy also includes objectives in section 6.9 (Local Transport services) to:

- *“Improve the integration of local transport services into the overall public transport network, through better interchange opportunities and information provision;*
- *Ensure a greater level of co-ordination between local transport services and longer distance scheduled bus and rail services; and*
- *Ensure a greater level of co-ordination between local transport services and other transport related services such as hospital and medical transport services.”*

Submission No. 5

Name: **Brian Lenehan**

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Provide an intermodal transit hub at a location like the 'Point' which provide for services to use the Port Tunnel and East Link and avoid the city centre. They could then interchange with the LUAS to access city centre.

Commentary / Response:

The draft transport strategy identifies the Core Bus Network and proposes its development to speed up access along its corridors. While it is intended that a number of regional and national bus services would use the M50 and the Dublin Port Tunnel to access the city centre, it would not be appropriate to redirect all national buses to one area of the city. This would impose an “interchange penalty” on passengers, who would be required to transfer to another service to access the City Centre.

However, one of the intentions of the draft transport strategy, outlined in Section 6.6 (Optimising Interchange and Transport Facilities) is to facilitate the contribution that good interchange can make to the transport system.

Submission No. 6

Name: Gerard Donohoe

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Link new Metro North to Donabate.

Commentary / Response:

There are no plans to extend New Metro North at this stage, and work undertaken to date indicates that the additional passenger usage would be unlikely to justify the significant cost of the extension to Donabate.

Submission No. 7

Name: Conor Kelly

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Supports the development of the cycle network, but to be effective it must be built to a high quality.

Commentary / Response:

The need to construct this network to a high standard is agreed. Section 5.6 of the draft transport strategy states: *“[a]s part of the Strategy it is intended to implement this network in full, delivering safe, high quality cycle facilities, which will be designed and constructed in accordance with the principles set out in the National Cycle Manual.”*

Submission No. 8

Name: Declan Wylde

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Look at business case for extending park and ride at the exit from the port tunnel to meet strong demand and utilise spare capacity in the tunnel towards city centre.

Commentary / Response:

The primary function of the Dublin Port Tunnel is to cater for HGV access to and from Dublin Port, and it is an objective of the draft transport strategy (section 5.8.4) to *“[e]nsure that the Dublin Port Tunnel continues to perform its primary function of providing access to Dublin Port for freight traffic.”* In addition, it was a principle of the development of the tunnel that it should not be used for car commuting to the city centre. Accordingly, a park and ride site at the southern exit of the Dublin Port Tunnel, focussed on commuter traffic, is not recommended for inclusion in the draft transport strategy.

Submission No. 9

Name: Paul O’Gorman

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Opposed to tolls on M50, will not pay them and this will result in increased traffic on suburban roads.

Commentary / Response:

Removal of tolling from the M50 will result in more cars using the M50 and an increased level of congestion. This would undermine the strategic function of the road.

Submission No. 10

Name: John M.

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Bus services running on the core network should be 24/7.
- Additional services on Metro north and south should be 24 hour.

Commentary / Response:

The draft transport strategy proposes in Sections 6.1 and 6.3 various enhancements to bus and rail services. This will include 24 hour services in a limited number of cases, where appropriate.

Submission No. 11

Name: Barry Miller

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- No specific mention of North Clondalkin/Ballyfermot QBC being designated for improvement. Services to North Clondalkin/Ballyfermot has got worse since Network Direct with a reduction in bus services due to changes in the 78 route. The primary bus service on the QBC, no.40, is overloaded. Those travelling from Lucan can get to Dublin City quicker. Proposals for the extension of services could include the 26 and 79/79A routes.

Commentary / Response:

The draft transport strategy does include the “Liffey Valley – Ballyfermot” and the N7/Clondalkin – Crumlin” corridors for development as part of the Core Bus Network.

Submission No. 12

Name: Alan Casey

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Luas Lucan line should be made more direct by making use of the N4 and linking with Heuston and through the south circular and the liberties.

Commentary / Response:

The Luas to Lucan project will be required to go through a full route options analysis, which will consider the previously proposed route as well as other viable alignments.

Submission No. 13

Name: Richard Logue

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Rail Navan line should be included as Navan is designated as a large growth centre, the M3 Parkway to Navan is part of the European TEN-T projects, the forecasts used are conservative and the rail option is not fully assessed and too easily dismissed; and
- M3 Toll plaza should be removed to allow people park at PACE.

Commentary / Response:

The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

In relation to removal of tolls, the tolling scheme on the M3 is the subject of a PPP contract and any potential changes would not be appropriate in a 20-year regional transport strategy.

Action: Insert at the end of section 5.2.8 the following text:

The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.

Submission No. 14

Name: Trish Fahey

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Interchange is poor with Broombridge cited as an interchange that should provide for bus;
- Proposal for a bus service from DCU to Broombridge via Finglas, in advance of Luas Cross City operations; and
- Targets are not ambitious enough, example of Holland and Copenhagen having mode share targets of 45% for cycling.

Commentary / Response:

In relation to transport interchange the draft transport strategy includes objectives in section 6.6 (Optimising Interchange and Transport Facilities) to:

- *“Provide high quality passenger interchange points, which facilitate convenient transfer between public transport services, in various town centres throughout the region and at key transport locations in the Dublin Metropolitan Area”;*
- *“Ensure that such transport interchanges are developed in a manner where service schedules are optimally coordinated, where distances between connections are minimised to the extent practicable, where good directional signage for connections is provided and where necessary operating facilities are provided to facilitate connectivity”.*

In relation to the proposed bus service, there is a limited level of public funding available to subsidise bus services. Given the likely passenger usage, and the limited subsidy support available, the introduction of this service would not be viable.

There is a major commitment to cycling in the draft transport strategy, underpinned by the development of the very comprehensive Greater Dublin Area Cycle Network Plan.

Submission No. 15

Name: Richard Logue

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Rail Navan line should be included as Navan is designated as a large growth centre, the M3 Parkway to Navan is part of the European TEN-T projects, the forecasts used are conservative and the rail option is not fully assessed and too easily dismissed.

Commentary / Response:

This is a duplicate submission to No. 13 – the same response applies.

Submission No. 16

Name: Noleen McCool

Organisation: Road Safety Authority

Summary of Submission Comments, Issues and Recommendations:

- Consider the provisions of the Road Safety Strategy 2013 to 2020.

Commentary / Response:

The Road Safety Strategy 2013 to 2020 establishes an “Action Plan” setting out 144 targeting actions to achieve an enhanced road safety environment. These actions include:

- Education Measures;
- Engineering Measures;
- Enforcement Measures; and
- Evaluation Data and Research Measures.

While many of those actions are outside the remit of the draft transport strategy, safety is a key component of all transport modes. The intent and objectives of the Road Safety Strategy 2013 to 2020 are fully reflected in the draft transport strategy through measures such as:

- Provision of safer pedestrian facilities (section 5.7);
 - Provision of safer cycling facilities (section 5.6);
 - Lower road speed limits in appropriate locations (section 5.7);
 - Enforcement measures (section 6.10);
 - Information provision including through Intelligent Transport Systems (section 6.11); and
 - Road improvements to enhance safety for users (5.8.2 and 5.8.1).
-

Submission No. 17

Name: Ronnie Miley

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Establish a bus route along the entire length of the R112.

Commentary / Response:

Routes along the R112 were considered in developing the Core Bus Network; the proposed route was not selected as part of the core network. However, this does not rule out other bus routes being developed along this corridor which will supplement the core bus network.

Submission No. 18

Name: Andrew Montague

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Should not have separate bike schemes in Dublin, the Dublin bike scheme should expand in other areas and work back to meet the existing Dublin Bike scheme rather than set up separate schemes.

Commentary / Response:

The issue of interoperability between bike share schemes will be addressed as part of the deployment of additional bike share scheme provision in the Greater Dublin Area.

Submission No. 19

Name: Oisin Dunne

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Extend "short hop zone" to Drogheda which would encourage the use of public transport in places like Laytown and Drogheda

Commentary / Response:

Section 6.4 of the draft Strategy provides for the improvement and restructuring of the fare system within the GDA and includes the proposal that *"A simplified fare system will be introduced in the Greater Dublin Area, covering bus, rail, Luas and Metro services, which will also facilitate multi-leg and multi-modal journeys in a cost effective manner"*.

Submission No. 20

Name: Paul Meagher

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Excellent idea to close the crossing at Coolmine and the erection of a bridge into Riverwood Court D15, a really good idea as the traffic jams during rush hour are disgraceful even for the emergency services, this should be a priority.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 21

Name: Michael Waddell

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- NTA have failed with regard to promoting public transport by agreeing to increase fares and reducing public transport subsidies - this policy approach has failed;
- NTA has failed the city by providing a menu of options and a bargain basement Metro to the airport, thus postponing the possibility of a real airport link;
- Need to provide priorities not a wish list;
- First priority should be to improve what already exists;
- Northern Line needs to be linked to the airport which could be achieved far quicker than Metro;
- NTA did not put adequate proposals to capital investment plan, should have included Dart Underground; and
- NTA needs to provide government with priorities not menus, starting with (1) Electrification of the rail lines, (2) Linking the Northern Line to the airport and (3) Dart Underground.

Commentary / Response:

Increases in fares have been required to offset reduced subsidy levels in recent years. The level of fares will continue to be a function of passenger numbers and available subsidy.

The issue of a rail connection to Dublin Airport was dealt with in the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

A commitment to maintain existing assets in an adequate and safe condition has been included in the relevant sections of the draft transport strategy, including sections 5.2.8, 5.3, 5.5.6 and 5.8.

Current funding is now addressed in the draft transport strategy in section 9.3.6 “Costs and Funding”.

Submission No. 22

Name: David Bacon

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Support demand management of motorways and roads to port and airport but should be for traffic flow objectives rather than revenue generation. Additional tolling points and charging should be implemented;
- NTA should be consulted in relation to both land use zoning and planning applications;
- Would like to see the results of a comparison between DART to Drogheda and the current diesel/DART mix;
- Not convinced Phoenix Park Tunnel should be pursued as using the interchange with existing Luas would be quicker;
- Increased train services between Pearse and Connolly talked about for years, why not implemented;
- Why is there a need for "removal, replacement, upgrading of ticketing system" when earlier in the report the issues identified the "overly complex fare structure";
- Nothing included to address issue of "frequent disruption to rail services";
- Development of Docklands and Poolbeg need control on parking or demand management to avoid grid lock;
- Support bus proposals, suggests Ranelagh to Drumcondra be extended at both ends to connect with DART (Landsdowne or Sandymount) and Clontarf on the north side;
- Support bus stop specific timetables, but buses should not leave before time, what's lost in speed is gained in reliability. Staff need to be trained in operating practices similar to that used in central and eastern Europe;
- Need to address buses ending at 23:30 in contracts;
- NTA should make proposals to improve and rationalise night services;
- High Frequency bus should be greater than 10 minutes;
- Transfer is supported even between lines and should be implemented in short term;
- Stop specific measures should be added to measures in Para 6.2; and
- Discourage option of buying ticket at stop, this service should only be offered as a premium.

Commentary / Response:

The Strategy supports demand management to realise the full potential of the measures proposed and to manage the increasing congestion on the radial national routes and the M50 which will undermines the strategic function of these routes. The details of the demand management will be developed on a case by case basis but will involve additional tolling on the M50 and on key radial national routes.

Existing legislation provides for the NTA to be consulted on development zoning and certain significant planning applications.

The Business Case for DART Expansion Programme has evaluated the changed train fleet requirements when the Northern Line is electrified to Drogheda.

Phoenix Park Tunnel will commence passenger services in 2016. It will remove the need for multiple interchanges for commuters currently using the Kildare Line and seeking to access the south east business district. The City Centre Resignalling is currently underway to facilitate the additional train services through the Phoenix Park Tunnel, which will see additional services operating between Connolly and Pearse .

In relation to reducing disruptions in train services, referred to in Chapter 3, the investments proposed in signalling, electrification and train control systems, as well as the removal of level crossings, will all contribute to providing a more resilient rail network.

Bus route changes will be implemented as part of bus network reviews, as set out in section 6.1 of the draft transport strategy. Many of the bus related items raised in the submission will require to be continually addressed as part of regular service reviews referred to in section 6.1.

Ticketing systems require regular upgrades and development as technology evolves and older systems become obsolete – the Leap Card system requires this also.

Parking restraint is included in section 5.11.

The Core Bus Network does not represent all of the bus services routes, merely the high frequency services that require a high level of bus priority.

Comments about bus departures, frequency levels and night services are noted. Section 6.4 of the draft transport strategy has an objective that “[a]ll bus services will migrate to a cashless system, to facilitate driver safety and faster passenger boarding times”.

Submission No. 23

Name: Peter Fay

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Luas Red Line extension to Poolbeg is considered too expensive, particularly if another bridge is required. It is recommended that an alternative option is sought which links with the Lucan Line, which will already be travelling east/west through the city; and
- The Red Line should be extended to Clontarf Road Station via Dublin Port and East Point passing through undeveloped Port lands and open space at the Mouth of the Tolka.

Commentary / Response:

The development potential of the Poolbeg area requires a high capacity public transport service. Routing this extension northwards will not serve this significant area.

Submission No. 24

Name: Michelle Boylan

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- It is considered unnecessary to close level crossing in Carpenstown area. It will have a negative impact on people living in the area as it will divide a community and prevent access to local facilities, services and access to the Royal Canal greenway. It would be better to optimise the signalling through a central control centre. This approach should be looked at and put for public consultation when working out the return on investment (as you would not need to build the alternative road bridge).

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 25

Name: Ron Healy

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Promote/permit local-loop services, suggest hub and spoke and/or hail and ride providing access to commuter services.
- Facilitate and encourage micro travel clubs with 8 seat or more vehicles which would accept payment including 'LEAP' but seats would be booked 1 to 5 hours in advance. An App could be developed along the lines of Hailo, Uber etc. Could be restricted to peak times
- Allow non-LEAP card holder to be paid for by LEAP card holder where advanced booking is possible.
- Allow LEAP card holders to transfer 'social journey credit' to other LEAP card holders.
- Local loop routes for students - reduces pressure on regular bus.
- Extend the 90 minute "discounted onward journey" to all PT operators (currently disjointed).

- Extend the 90 minute 'discounted onward journey' where a first journey was made on a non-purse ticket and they want to make a 2nd trip on a service not covered by that type of ticket.
- Consider making 90 minute 'discounted onward journey' free with only a small loss of revenue.
- Have bus user counters at bus stop to inform, through RTPI, passengers when bus will be full or number of spaces available.
- Automate to twitter changes in schedule from RTPI and vehicle location. Set a consistent handle for each route e.g. #40LiffeyValley
- Consider a booking system for longer bus journeys similar to trains. System like smartphone based 'receipts' could be used and hogging of seats avoided by providing 1 to 5 hours booking restriction.
- A Waterbus service(using LEAP) to Heuston but maybe further to Chapelizod or Lucan on the West to the Docks, Grand Canal and Ringsend area in the east.
- Consider funding or contracting very long-term car parks near commuter services that could be rented but there would be more of these than currently provided for in the strategy.
- Analyse anonymised addresses of LEAP card holders and use information to determine shortest distance to nearest bus stop. Helps plan additional services.
- Consider "public transport integration points" which would allow interchange between services in one location under cover of some sort.
- Policy on demand management should be to continually improve public transport not to continually penalise private motorists.
- Whenever new infrastructure provided consider adding cycle paths - segregated from LUAS for safety reasons e.g. cycle way along any LUAS.
- Consider cycle paths on more integrated basis, segregation between cyclists and other vehicles where possible. Could use canal arteries.
- Light freight on canals or other similar innovation to make use of the waterways.
- Provide a pseudo parallel road network to the M50 to take traffic off M50 for traffic only moving between National Roads.
- Encourage more permanent walking buses to school on safe routes. Encouraging innovations that would keep children dry in wet weather.
- Consider connection between Phoenix park tunnel and Maynooth line and consider a shuttle between Heuston and the Maynooth line.
- Consider an express tunnel under city with bus lanes, no connection to roads in city centre, for cross city traffic.
- Build roads above/alongside rail lines leading to the M50 boundary with limited on/off ramps which are connected to transport services. Using traffic light arrangements only allow access in direction of commuting demand.
- Supervised bicycle parking in city centre and train stations which provide for hiring of bikes.
- Consider LEAP card into taxi, hackney and other transport providers.
- Incentivise private operators very light rail services on disused spur and branch lines and allow in use spur and branch lines to be transitioned to VLRS. This could free up heavy rail stock from these lines.
- Develop a single brand to allow user self-service and engage with all types of users not IT consultancy or Vendors. TFI should be used.

Commentary / Response:

This submission provides a very extensive set of alternative proposals covering many aspects of the draft transport strategy, including road tunnels, limited access roads along rail lines, "Very Light Rail" on spur and branch rail lines, as well as various proposals in relation to bus services and cycling infrastructure. Some of the proposals may be more applicable to the Integrated Implementation Plan for Transport

stage, for example those proposals relating to fares and passenger information systems, for which the context for improvements is set out in Chapter 6 of the draft transport strategy.

While the individual proposals in the submission are clearly enunciated many are, understandably, simply concepts, and don't have the benefit of the rigorous transport modelling and assessment that has gone into developing the proposals set out in the published document and the background technical reports. While the suggestions do not lack ambition and seeks to achieve a much improved transport system, the issue of cost, usage and economic viability have to be taken into account.

The proposals set out in the draft transport strategy have been carefully developed to provide an integrated solution that addresses the transport demands across the region. The submission includes proposals for an even more extensive public transport network, which will be significantly more expensive than the network included in the draft transport strategy. The submission also includes a number of suggestions regarding the road network, a topic which is dealt with in section 5.8 of the draft transport strategy.

In relation to numerous items in the submission, such as the use of an integrated brand, the extension of Leap cards to other areas, transport integration and others, these are already part of the various proposals set out in the draft transport strategy.

Submission No. 26

Name: Ivo Brett

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- It is considered unnecessary to close the level crossing in the Carpenterstown area. It will have a negative impact on people living in the area as it will divide a community and prevent access to local facilities, services and access to the Royal Canal greenway. It would be better to optimise the signalling through a central control centre. This approach should be looked at and put for public consultation when working out the return on investment (as you would not need to build the alternative road bridge).

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 27

Name: Eoghan Murray

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Suggest that the term "lift sharing" should be added alongside "car sharing" as he considers that car sharing involves the use of rented cars while lift sharing might involve someone sharing a lift and contributing to the costs.
- Behavioural change will not be enough to encourage car/lift sharing and additional measures will be required such as higher tolls for single occupancy.

Commentary / Response:

In relation to the addition of lift sharing it is proposed to amend the draft strategy as per the action below. In relation to additional measures required to support behavioural change, these are included in the draft strategy under section 5.9 which provides for complementary demand management measures which will provide the full benefits of the Strategy.

Action:

In section 5.9, replace "Car club schemes and car sharing" with "Car club schemes, car-pooling and car sharing".

Submission No. 28

Name: DIT GreenCampus Committee

Organisation: DIT GreenCampusNone

Summary of Submission Comments, Issues and Recommendations:

- Orbital route serving North of Grangegorman;
- A link between Royal Canal cycle greenway from Phibsborough to Broadstone;
- interchange Luas/Bus/Bike at Broadstone;
- Link between Smithfield cycle-walkway and Grangegorman;
- Early reprioritisation of Blanchardstown BRT;
- Strong pedestrian links to BRT;
- Consideration of bike scheme in Phibsborough;
- Improve bike parking at Heuston;
- Investigate P&R for commuter bikes at Dunboyne including for lockers;
- Provision of rail carriage for bikes by Irish Rail;
- Commitment to designated budget per person for cycling, Holland and Denmark €25, NTA €5 per person;
- Upgrading of cycle access facilities to campus;

- Coordinate FCC and SDCC engineers to use best practice from Cycle design manual;
- Provide for 30kph limit at entrance to college and surrounding roads; and
- Bus and Luas services should reflect day and night uses in the college.

Commentary / Response:

An assessment of the orbital routes was considered in developing the Core Bus Network – the suggested route was not selected. However, this does not rule out other bus routes been developed along this corridor which will supplement the core bus network.

The draft transport strategy provides for the delivery of the cycle network set out in the Greater Dublin Area Cycle Network Plan.

Interchange between modes is addressed in section 6.6.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans. Expansion of the Dublin Bike scheme is catered for under section 5.6.

The draft transport strategy does state in section 5.6 that it is intended to “*[s]eek the expansion of the bike share scheme in Dublin City (dublinbikes) and the introduction of similar schemes in other appropriate centres across the GDA.*” It also provides for increased cycle parking.

While control of speed limits in the vicinity of the campus is a local issue, the draft transport strategy does support the introduction of lower speed limits in appropriate locations.

Submission No. 29

Name: Jerome Corby

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- It is considered unnecessary to close the level crossing in the Carpenterstown area. It will have a negative impact on people living in the area as it will divide a community and prevent access to local facilities, services and access to the Royal Canal greenway. It would be better to optimise the signalling through a central control centre. This approach should be looked at and put for public consultation when working out the return on investment (as you would not need to build the alternative road bridge).

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 30

Name: Marian Duffy

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- It is considered unnecessary to close the level crossing in the Carpenterstown area. It will have a negative impact on people living in the area as it will divide a community and prevent access to local facilities, services and access to the Royal Canal greenway. It would be better to optimise the signalling through a central control centre. This approach should be looked at and put for public consultation when working out the return on investment (as you would not need to build the alternative road bridge).

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 31

Name: Dave Ballesty

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- 15-25 seater electric buses should operate within the towns;

- Provide bicycle racks on buses from hinterland into connection hubs;
- There is capacity to increase rail frequency by stopping the suburban rail at Greystones and discharging the passengers onto a waiting DART. A related benefit would be the freeing up of track capacity, north of Greystones, to allow for increase in DART service frequency;
- Consideration should be given to the relocation of the track (in Co. Wicklow) in its current coastal location – coastal defence issues;
- Provide a cycle/ green route from Arklow to Bray to facilitate access to rail stations and provide cycle locker at rail stations;
- Improve bus service frequency to Arklow and so provide alternative retail destination to Dundrum, for Wicklow residents;
- Improve bus accessibility to new school sites in Wicklow town, ref. school sites on Relief Road;
- More cycle parking at points from which bus and rail services depart;
- In Wicklow Town, greater integration between rail and bus service schedules, to improve accessibility to town centre and schools;
- Remove delineation between cars, cycles and pedestrians by re-engineering urban roads;
- Safe stopping distance chevrons should be displayed on the road;
- A tax efficient car pooling arrangement should be put in place, similar to tax breaks given to rail and parking; and
- Quality bus lanes on the M/N11 to Cherrywood or Carrickmines would be a better option than the Luas extension to Bray.

Commentary / Response:

The draft transport strategy provides for improvements in bus and train services (Chapter 6).

It is accepted that the existing track arrangements south of Bray will facilitate an enhanced train service. Work carried out by the Authority indicates that the frequency of services from south of Greystones can be increased on the basis of the existing track infrastructure. By increasing the DART frequency to Greystones, there is the opportunity for an overall enhanced level of service based on interchange at Greystones.

This is covered in the draft transport strategy in section 6.3 which states: *“[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones”*.

In addition, the draft transport strategy does not preclude further track enhancements along this corridor - section 5.2.8 states: *“[a]dditional track works to enhance service efficiency”*.

Better integration between transport modes is included in the draft transport strategy as is provision of cycle parking at transport hubs.

Shared road use in the form of “shared streets” is only appropriate in certain urban locations and can be considered as part of the overall objective of enhancing pedestrian movement.

The extension of Luas to Bray, following capacity increases on the existing Green Line, is required to deal with the level of transport demand along this corridor.

A cycle route from Arklow to Bray is included in the GDA Cycle Network Plan which is incorporated in full in the draft transport strategy.

Other items in the submission are either addressed within the draft transport strategy or are of a more local or detailed nature, which are outside the remit of a regional strategy.

Submission No. 32

Name: Deirdre Corby

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposed closure of level crossing, particularly the crossing at Coolmine, is not required. An alternative would be to develop a new train control centre to allow the existing working system to operate more efficiently. It would also reduce costs in terms of bridge construction.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 33

Name: Tom Vogelaar

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposes prioritisation of rail electrification schemes, as follows:
 - Maynooth and M3 Parkway;
 - Malahide to Balbriggan;
 - Balbriggan to Drogheda; and
 - Heuston to Hazelhatch.

Commentary / Response:

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

The electrification to Balbriggan has been prioritised in the recent Capital Plan, on the basis of the proposed housing development that is planned for Rush, Lusk, Donabate and Balbriggan.

Submission No. 34

Name: David Malone

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposed closure of level crossing, particularly the crossing at Coolmine, is not required. An alternative would be to develop a new train control centre to allow the existing working system to operate more efficiently, as outlined in City Centre resignalling. It would also reduce costs in terms of bridge construction.
- Closure of level crossing would impose disruption to community living along the Maynooth line, in terms of access to local amenities.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 35

Name: Cllr William Lavelle

Organisation: Fine Gael (Lucan and Palmerstown, FG Leader on SDCC)

Summary of Submission Comments, Issues and Recommendations:

- The NTA need to progress short term measures to address Dublin's 'looming traffic congestion crisis';

- In relation to Luas to Lucan, the preferred route should be redesigned to ensure a direct, effective route that will result in the shortest possible journey times between Lucan and the City Centre;
- As a short term measure, additional buses should be added to route 25A, B & D to promote modal shift in the Lucan and address local traffic congestion;
- Previously proposed 166 bus route should be introduced to provide an orbital bus service linking Lucan, Clondalkin and Tallaght;
- Proposals for the N4 reconfiguration should seek to eliminate traffic delays around the Quarryvale junction – opportunities for enhanced bus priority between the Quarryvale junction and Kennelsfort Road junctions, impact of tailbacks from Kennelsfort Road and Quarryvale junctions on M50/N4 junction; and
- Plans to link the N3, N4 and N7 by way of a Western Orbital Road should be subject to a more specific action in the Transport Strategy.

Commentary / Response:

It is acknowledged that congestion is increasing across the Dublin area. The central part of the solution to that issue is the provision of additional public transport and the increased movement of people by public transport, walking and cycling.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

Kishogue Station will be opened. The exact timing of the opening will be dependent on the availability of funding to complete the ancillary works to the station and likely passenger usage.

The Luas to Lucan project will be required to go through a full route options analysis, which will consider the previously proposed route as well as other viable alignments.

The provision of additional buses on specific routes is outside the ambit of a regional transport strategy and can be addressed separately.

The draft transport strategy does provide for enhanced orbital bus movement and proposes corridors for bus priority development. This enhanced orbital movement does include linkages between Lucan, Clondalkin and Tallaght.

The draft transport strategy includes (section 5.8.1) for enhancements to the N4 national road, which will include upgrade works at Quarryvale Junction.

The draft transport strategy includes (section 5.8.2) a specific commitment to *“enhance orbital movement, outside of the M50 C-Ring, between the N3, the N4 and N7 national roads, by the widening of existing roads and the development of new road links”*.

Submission No. 36**Name:** Noel Wilson**Organisation:** None**Summary of Submission Comments, Issues and Recommendations:**

- The rail service plan is not ambitious enough;
- Need for a much more ambitious public transport system, for example, along the lines of that proposed by Cormac Rabbitt and Metro Dublin Scheme – NTA needs to assess their stance on the Metro Dublin scheme;
- Need for a medium range plan with much more ambitious scale and timelines;
- Tolling should be removed from the M50 and can be reintroduced when public transport alternatives are available – as an incentive not to drive; and
- Dublin Airport should be reachable by intercity train.

Commentary / Response:

The rail proposals in the draft transport strategy have been developed on the basis of likely future transport demand, and aligning the level of public transport provision to the likely level of passenger usage along a particular corridor. Where lower capacity modes such as bus or bus rapid transit provide sufficient capacity, it is appropriate that these are proposed as the correct solution for a particular corridor.

The Metro Dublin proposals were considered in the development of the draft transport strategy, and, in particular, during the Fingal / North Dublin Transport Study which recommended the new Metro North project.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

Removal of tolling from the M50 will result in more cars using the M50 and an increased level of congestion. This would undermine the strategic function of the road.

The issue of a rail connection to Dublin Airport was dealt with in the the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

Submission No. 37

Name: Mark Penny

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposed closure of level crossings, particularly the crossing at Coolmine, is not required. An alternative would be to develop a new train control centre to allow the existing working system to operate more efficiently, as outlined in City Centre resignalling. It would also reduce costs in terms of bridge construction; and
- Closure of level crossings would impose disruption to communities living along the Maynooth line, in terms of access to local amenities.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 38

Name: John Mark Mc Cafferty

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- DART Interconnector is essential for an integrated transport strategy and needs to be invested in as a matter of urgency;
- In relation to the Phoenix Park Tunnel line, the Strategy is not exploiting the potential to serve locations such as Ballyfermot, Inchicore/Kilmainham, Cabra, Cabra/ Phibsborough at Cross Guns Bridge;
- In relation to Metro South, rather than duplicating existing Luas between Stephens Green and Ranelagh, an alternative alignment should be devised - suggested route to Harolds Cross, allowing future extension to Terenure, Tempelogue, Rathfarnham, Kimmage;
- Include Luas Cross City extension to Finglas/ Charlestown concurrent with other projects after the completion of existing scheme;
- Any plans to extend Dunboyne line to other Meath commuter towns in the future?
- Use Amsterdam bus network model;

- Need for extensions to *dublinbike* stations to strategic locations such as the Coombe, Druncondra rail station, points between there and DCU and St Patrick's Teacher Training College and the corridor between Grand Canal at Leeson Street and UCD; and
- Provide real time facility for Aircoach and all non CIE services.

Commentary / Response:

The importance of the DART Expansion Programme has been fully recognised within the draft transport strategy.

Following the opening of the Phoenix Park Tunnel to passenger services in 2016, the potential for additional stations and service refinements will be assessed.

The reason for upgrading the Luas Green Line to a metro operation, which means the system is fully segregated from road traffic, is that with the growth of areas such as Sandyford and Cherrywood, the existing Luas system will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation. Accordingly, developing an alternative such as the alignment suggested, will not alleviate the capacity issues on the existing Green Line.

The timing of the future Luas extension to Finglas will be addressed in future Integrated Implementation Plans.

In relation to extending the new Metro North beyond Swords to link in with the Northern Line, the assessment work undertaken to date does not indicate an economic justification for such extension.

The draft transport strategy has addressed the issue of potentially extending the existing rail line currently terminating at Pace, to Navan. It identifies that there is insufficient passenger demand to justify this extension and, instead, proposes an enhanced bus service to address the public transport movements along this corridor.

Enhanced bus services are a central part of the draft transport strategy, with a network of high frequency routes identified for development.

In relation to the further expansion of the *dublinbikes* scheme, this is provided for in the draft transport strategy (Section 5.6).

The inclusion of private bus operators in the real time passenger information system will be available to private bus operators.

Submission No. 39

Name: Mary Malone

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposed closure of level crossings, particularly the crossing at Coolmine, is not required. An alternative would be to develop a new train control centre to allow the existing working system to operate more efficiently, as outlined in City Centre resignalling. It would also reduce costs in terms of bridge construction; and
- Closure of the level crossings would impose disruption to communities living along the Maynooth line, in terms of access to local amenities.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 40

Name: Colm Kelly

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposed closure of level crossings, particularly the crossing at Coolmine, is not required. An alternative would be to develop a new train control centre to allow the existing working system to operate more efficiently, as outlined in City Centre resignalling. It would also reduce costs in terms of bridge construction.
- Closure of level crossings would impose disruption to communities living along the Maynooth line, in terms of access to local amenities.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 41

Name: Tom Freaney

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

This submission provides a comprehensive review of the various proposals in the draft transport strategy and sets out the author's views on changes and additions for consideration. Among the various suggestions and proposals set out in the submission are the following proposals:

- Alternatives to the DART Network, use of the Phoenix Park Tunnel and DART Underground Tunnel;
- Navan Rail Line should be included as part of the plan;
- Metro North Platforms should all be 90m to facilitate longer trains as required;
- Proposes alternatives to the development of the Luas network;
- Suggests that Tallaght should be linked to the City Centre by Rail in the longer term;
- Metro West should be included as part of the plan. Expanded Orbital Rail links also suggested;
- Too many buses are concentrated on the O'Connell Street- College Green corridor, this should be spread out to areas such as the Docklands;
- Bus fare structure could be changed to encourage higher usage;
- Regional town bus services should be branded;
- Supportive of Cycling proposals and *dublinbikes*, which should be expanded over time;
- Against road construction, in particular Leinster Outer Orbital route;
- Demand Management measures should be considered, such as variable tolling of M50; and
- Highest priority is the construction of DART Underground.

Commentary / Response:

This submission provides a very extensive set of alternative proposals covering almost all aspects of the draft transport strategy.

While the individual proposals in the submission are clearly enunciated they are, understandably, simply concepts, and don't have the benefit of the rigorous transport modelling and assessment that has gone into developing the proposals set out in the published document and the background technical reports. While the suggestions do not lack ambition and seeks to achieve a much improved transport system, the issue of usage and economic viability have to be taken into account.

Some of the proposals may be more applicable to the Integrated Implementation Plan stage, for example those proposals relating to fares, for which the context for improvements is set out in Chapter 6 of the draft transport strategy.

The proposals set out in the draft transport strategy have been carefully developed to provide an integrated solution that addresses the transport demands across the region. The submission includes proposals for an even more extensive rail network, which will be significantly more expensive than the network included in the draft transport strategy. Given the transport modelling work done to date, that more extensive network is not economically justifiable on the basis of likely passenger use.

For instance, with the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers seeking to travel along the entire corridor to Bray. Lengthening the trams to 50+ metres and increasing services will provide additional

capacity in the short-term. Further carrying capacity will be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic. Based on the examination of forecast demand for travel to 2035 at this corridor, it is deemed that a Metro level of service is required from the City Centre to Cherrywood, with light rail Luas being the most suitable mode to link onwards to Bray.

The submission also advocates the extension of the rail service to Navan. The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

In relation to the south west sector of the city. based on the transport modelling work done to date, a Bus Rapid Transit (BRT) solution has sufficient capacity to serve the Rathfarnham/Tallaght corridor rather than the metro proposed in the submission.

Metro West is advocated strongly in the submission. The assessment work carried out on developing the Core Orbital Bus Network carefully assessed to likely future demand and concluded that the development of high quality orbital bus corridors will provide the appropriate capacity for public transport orbital movement demand.

The issue of a rail connection to Dublin Airport was dealt with in the the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

Concerns are expressed within the submission in relation to the BRT proposals. The BRT proposals in the draft transport strategy are focussed on corridors where the passengers capacity needs are within the carrying capacity of a BRT system.

The submission proposes running Mullingar and Longford commuter trains to Docklands station. This is considered to be a less attractive passenger service than the current arrangement that connects to Connolly / Pearse. In relation to Docklands station, an extension of the temporary planning consent has been sought.

The submission proposes a timetable for delivering the key projects set out in the submission. This timeline extends out to 2050, fifteen years after the horizon year of the draft transport strategy. It is

notable that the timeline of projects in the early years differs from the recent announcements in the Government's Capital Plan.

The submission also includes a number of suggestions regarding the road network, a topic which is dealt with in section 5.8 of the draft transport strategy. The submission also covers cycling, park & ride proposals and various other transport elements included within the published document. These areas have been addressed in sections 5.6 and 5.10 as well as Chapter 6 of the draft transport strategy.

Submission No. 42

Name: Cllr. Sean Smith

Organisation: Meath County Council

Summary of Submission Comments, Issues and Recommendations:

This submission proposes the following additions to the draft transport strategy:

- A rail line from Pace to Ashbourne to Dublin Airport;
- Park & Ride north of Ashbourne;
- Upgrade of N2 north of Ashbourne;
- Construct Leinster Outer Orbital Route; and
- Connect Ashbourne and Ratoath by footpath / cycleway.

Commentary / Response:

In relation to the provision of a rail line to Ashbourne, serving Dublin Airport and connecting to the existing network at Pace, the level of passenger demand would not justify the provision of a rail service.

A Park & Ride facility has been proposed at Finglas, in the vicinity of the intersection of the M2 and M50 national routes, and services by the Luas extension to Finglas. It is considered that this is a more optimal arrangement than locating a Park & Ride facility at Ashbourne, utilising a bus service.

Section 5.8.1 of the draft transport strategy provides for “[e]nhancements of the N2/M2 national route inclusive of a bypass of Slane”.

In relation to the Leinster Orbital Route, the draft transport strategy (Section 5.8.1) “[w]hile this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”

The Greater Dublin Area Cycle Network Plan provides for an improved cycle linkage between Ashbourne and Rathoath (Route M15).

Submission No. 43

Name: Amanda Mulvee

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Dublin 18 needs revised traffic management arrangements to address parking issues.

Commentary / Response:

This is an issue to be dealt with locally and is outside the ambit of a regional transport strategy.

Submission No. 44

Name: Andrew Doyle TD

Organisation: Fine Gael

Summary of Submission Comments, Issues and Recommendations:

This submission endorses the recommendations of Cllr. Derek Mitchell. Those recommendations include:

- Extra train services from Arklow/Gorey;
- Extra park & ride facilities at stations;
- Operational train movement arrangements at Greystones;
- Extra bus services;
- Provision of a footpath to Kilcoole Station and pedestrian / cycle bridge at Greystones;
- Double track north of Greystones to the tunnel;
- Provide for Rail / Luas interchange in Bray;
- Consideration needs to be given as to how to serve Fassaroe;
- Higher speeds needed from Dun Laoghaire to Sandycove; and
- Additional train stations at Newcastle and Avoca.

Commentary / Response:

The existing track arrangements south of Bray can facilitate an enhanced train service. Work carried out by the Authority indicates that the frequency of services from south of Greystones can be increased on the basis of the existing track infrastructure. By increasing the DART frequency to Greystones, there is the opportunity for an overall enhanced level of service based on interchange at Greystones.

This is covered in the draft transport strategy in section 6.3 which states: *“[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones”*. In addition, the draft transport strategy does not preclude further track enhancements along this corridor - section 5.2.8 states: *“[a]dditional track works to enhance service efficiency”*.

The provision of additional park & ride facilities at stations is provided for in the published document – section 5.10.

The importance of interchange between transport modes and transport services is fully recognised in the draft transport strategy. Appropriate interchange facilities at Bray will be developed.

Provision of a footpath at Kilcoole and the provision of a pedestrian / cycle bridge at Greystones are fully supported by the draft transport strategy.

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic.

Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

The achievement of higher speeds on the DART system between Dun Laoghaire and Sandycove is something that can be examined as part of the operational arrangements for the DART service.

In relation to the provision of additional stations on the rail network, the draft strategy states: “[o]ver the period of the Strategy, a number of additional stations will be added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Exact locations will be determined at the relevant time, but likely locations include Pelletstown on the Maynooth Line and Woodbrook on the South-Eastern Line.” This provision will facilitate the development and opening of additional stations at appropriate locations.

Submission No. 45

Name: Barbara Kenny

Organisation: Fleet Street Car Park Limited

Summary of Submission Comments, Issues and Recommendations:

- Supports expansion of on street parking controls and the need to introduce parking charges at out of town retail centres;
- Any PT changes in the city centre need to ensure that convenient and quality access for car park customers is maintained; and
- Propose establishment of a transport forum.

Commentary / Response:

The draft transport strategy envisages a transport system that ensures the vitality of urban centres and does not seek to prohibit reasonable car park access for retail purposes.

Section 17 of the Dublin Transport Authority Act 2008 provides for an Advisory Council, comprising of a chairperson and 23 ordinary members, to be appointed. The role of the Advisory Council is to make

recommendations to, and to advise, the Authority in relation to the performance of its functions. The establishment of the Advisory Council is a matter for the Minister for Transport, Tourism and Sport.

Submission No. 46

Name: Sean Smyth

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposes alterations to proposed Metro North and Finglas Luas extension;
- Supports Poolbeg Luas line;
- Proposes moving Dublin Port to an out of town facility;
- Supports extension of Luas Green line;
- Proposes reopening of Drogheda – Navan rail line to commuter services, with stop at Duleek;
- Proposes DART line to airport;
- Recommends upgrading cycle facilities along the canals; and
- Proposes a Milltown Luas line running to Nutley Lane via UCD.

Commentary / Response:

A substantial part of the submission addresses the issue of new Metro North and a DART connection to Dublin Airport.

The provision of public transport along the Swords / Airport to Dublin City Centre corridor was dealt with in the Fingal / North Dublin Transport Study, which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recently announced national Capital Plan. The proposals in the submission addressing this general corridor do not align with that Government decision.

In relation to the proposal to move heavy Port activities to a new location, this was previously the subject of a study commissioned by the Department of Transport, Tourism and Sport, which recommended against such relocation.

The draft transport strategy has addressed the issue of potentially extending the existing rail line currently terminating at Pace, to Navan. It identifies that there is insufficient passenger demand to justify this extension and, instead, proposes an enhanced bus service to address the public transport movements along this corridor. On the issue of reopening the rail line between Drogheda and Navan, a similar position of insufficient passenger demand to justify a heavy rail service applies here also.

The draft transport strategy does incorporate the delivery of the Greater Dublin Area Cycle Network Plan, which includes the development of high quality cycle routes along the Royal and Grand Canals.

In respect of the proposal to Luas line from Milltown to St. Vincent's Hospital, the passenger demand along this route would not support a light rail provision.

Submission No. 47

Name: Kevin Traynor

Organisation: Coach Tourism and Transport Council of Ireland

Summary of Submission Comments, Issues and Recommendations:

- CTTC broadly support the recommendations of the strategy;
- There is no prioritisation of transport related problems facing the GDA;
- Strategy objectives lack clarity;
- Limited consideration of the opportunities to exploit the current bus/coach service role;
- Benefit to cost ratio of 1.3 is low;
- Failure to fully consider the role of private bus operators to support realisation of strategy;
- Conflicts between bus and cycle priority;
- Support new Metro North to serve Airport – BRT along this corridor is not economically justified;
- Supports coach parking provision but must be available to all operators;
- Proposes prioritisation of core bus network; and
- Recommend that the identified concerns be addressed in context of the development of the new Integrated Implementation Plan.

Commentary / Response:

This submission provides a very comprehensive review of the draft transport strategy.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

The submission proposes the implementation of the Core Bus Network during the period of the first Integrated Implementation Plan – section 5.12 does propose the delivery of this network in the first half of the overall strategy period.

The core strategy object is “[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.” The draft transport strategy strongly recognises the role of bus-based transport across the region and its fundamental role in providing the needs of the majority of public transport users across the Greater Dublin Area. In delivering this function, it is clear that it will comprise a combination of publicly

subsidised transport services and private commercial services, and the role of private bus operators is acknowledged.

The draft transport strategy is focussed on the provision of the correct transport solutions to address the future needs of the region. Such solutions should be similar regardless of whether they are provided by either the public or the private sectors. Accordingly, and particularly in relation to bus-based transport, the provision of services in the draft transport strategy should not, and does not, exclude private sector involvement.

In relation to commentary in the submission about non-delivery of previous proposals, the reality is that the key challenge in such delivery is usually finance. Over the last period of time, Ireland's economic circumstances have meant that, understandably, the availability of Exchequer funding has been limited and it has not been possible to progress many needed projects in the transport area.

Coach parking is addressed within the draft transport strategy (section 5.5.6) and the provision of an off-street facility in Dublin City Centre is being progressed at present. It is intended that new coach parking facilities will be available to all operators.

The position in relation to a possible BRT scheme along the Swords/Airport to City Centre corridor is set out in section 5.5.4 of the draft transport strategy.

The comments in relation to cycling provision versus bus priority are noted and will require to be addressed on a case by case basis during project development.

Submission No. 48

Name: Tim Hayes

Organisation: Chartered Institute of Logistics and Transport

Summary of Submission Comments, Issues and Recommendations:

This submission provides a comprehensive review of the various proposals in the draft transport strategy and sets out certain concerns and various proposals for consideration. Among the various concerns and proposals set out in the submission are the following:

- Generally supportive of the objectives and balance of the proposals set out in the draft transport strategy;
- Over emphasis of capacity by mode criteria in the assessment of the strategy;
- Should rely more on economic criteria;
- Little mention of freight or deliveries;
- Demand management of M50 is a concern. Leinster Outer Orbital and Eastern Bypass should be reconsidered;
- Demand projections seem very modest;
- More quantitative assessment of the proposals should be set out in the document;
- DART Underground / Metro North are both favoured, and preferable to on street light rail improvements;
- DART Underground / Metro North need to be planned for long term, enhancements such as platform extensions will be very costly if retrofitting is required;

- Increase in cycling can have a negative effect on bus speeds, as such segregated facilities for cycling should be considered;
- Limited benefit of extending DART to Drogheda; and
- Concern over function of interchange between PT services to access the city centre.

Commentary / Response:

It is accepted that transport capacity should not be the sole determinant for the establishment of the appropriate public transport solution along a particular corridor. However, it is a very significant factor. It is also acknowledged that the capacity envelope for BRT systems can vary substantially based on the type of system proposed. Highly segregated systems as used in certain cities around the world can have very high capacity levels, whereas many of the BRT systems in European cities operate to a more moderate capacity. Under the Public Spending Code, and reflecting good practice in any event, a comprehensive cost benefit assessment, examining all viable options, is required for any major transport project.

The issue of freight is dealt with in Section 5.8.4 of the draft transport strategy. As freight is, and will continue to be, predominately transported by road, the key recommendations are to ensure that the key national routes can continue to perform their strategic function, including facilitating the efficient movement of freight.

While the concerns regarding demand management on the M50 are acknowledged, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively. It will not be possible to await the development of the Leinster Orbital Route or the Eastern Bypass, before demand management will have to be introduced on the M50.

In relation to the increase in travel by 25% this refers to all journeys in the region, including journeys to schools and colleges plus- short local trips. Journeys to work do increase by a higher percentage.

Off-peak usage of public transport is something which should be, and is being, encouraged. Recent fare determinations by the Authority have included a strong focus in this area.

The issue of the difficulties of extending platforms on metro and rail projects following operating commencement is accepted. In developing the new Metro North and the DART Underground projects, future-proofing of the system for the longer term will be ensured.

Bus Rapid Transit is included in the draft transport strategy and is intended to be delivered. The factors about appropriate distances for standing passengers and seating provision are acknowledged and have to be considered in the development of any BRT project in the region.

The draft transport strategy strongly recognises the role of bus-based transport across the region and its fundamental role in providing the needs of the majority of public transport users across the Greater Dublin Area. Central to that role is the development of the Core Bus Network, with a much enhanced level of priority for buses on these corridors.

It is accepted that cyclists can have a negative impact on bus services where common road space is shared by the two modes. The draft strategy does set out (Section 5.6) that *"it is intended that many of the key cycling routes will be developed as segregated facilities, with cyclists separated from vehicular traffic through the use of kerb separators or by having the cycleway at a higher level than the road carriageway."*

In relation to the electrification of the Northern Rail line to Balbriggan, the land use plans for Fingal envisage significant housing development taking place in Rush, Lusk and Balbriggan. Additional rail

capacity is required to address the significant additional transport demand arising from such development.

Assessment of the Lucan Corridor does indicate that light rail level capacity is required to address the future demands of the corridor.

In relation to rationalisation of city centre bus stops and the provision of stop specific timetables, these are measures which are in the process of being implemented.

Interchange is a fundamental feature of public transport networks internationally. It is accepted that it needs careful consideration in the relevant network design and should be deployed appropriately.

Submission No.49

Name: Michael O’Gara

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Park and Ride should be considered at further distances from Dublin, specifically Gorey /Arklow /Wicklow.

Commentary / Response:

Park and ride provision is dealt with in section 5.10 of the draft transport strategy. However, to function effectively, a strategic park and ride site requires a high frequency public transport linkage to the destination locations. Locations such as Gorey, Arklow and Wicklow do not have a sufficiently high frequency of service to justify a strategic park and ride site. However, they do require adequate car park facilities for all regular train users accessing the stations by car.

Submission No. 50

Name: George Willoughby

Organisation: Kildare County Council

Summary of Submission Comments, Issues and Recommendations:

- More public transport initiatives for the hinterland areas would be welcomed;
- Details of Demand Management should be set out. Road tolling can have adverse effect on adjacent roads /communities;
- Supports Park and Ride;
- Idea of filtered permeability in favour of vulnerable road users appears to be in conflict with DMURS; and

- More detail required on the road schemes to allow for route protection.

Commentary / Response:

There are numerous public transport initiatives proposed in the draft transport strategy addressing the needs of the Hinterland area. These include increased train and bus frequencies, the identification and development of regional bus corridors, replacement and upgrading of bus vehicles, fare initiatives and various other measures.

The details of the demand management will be developed on a case by case basis but will involve additional tolling on the M50 and on key radial national routes. The M50 Demand Management Report published in 2014 sets out details of potential tolling arrangements and charges related to the M50 motorway.

Park and ride provision is dealt with in section 5.10 of the draft transport strategy.

Filtered permeability is fully provided for in the Design Manual for Urban Roads and Streets.

In relation to the details of the individual road schemes, these will fall to be developed as part of the design of the particular road projects.

The submission notes the statement in section 4.3 in relation to *“increasing car parking levels at destinations such as shops and schools”*. This was one of the option elements considered – it is not a recommendation of the draft transport strategy.

Submission No. 51

Name: Warren Whitney

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

This submission provides a comprehensive review of the various proposals in the draft transport strategy and sets out certain concerns and various proposals for consideration. Among the various issues covered in the submission are the following:

- Broadly supportive of the draft transport strategy;
- Concerns about funding levels and project delivery;
- Comments that BCR of 1.3:1 is lower than 2030 Vision and Platform for Change, with no obvious explanation;
- Accepts arguments for: excluding M3 Parkway - Navan route corridor, for no additional track capacity pre 2035 on Howth Junction to East Wall section; for no city-centre congestion charging at the present time;
- Outer Orbital Study makes no reference to BRT or Rail options, therefore can't compare to recommended package. Peak Hour figures may justify Blanch-Tallaght BRT level;
- Lack of interchange with Maynooth Rail line on Outer Orbital Bus Route;
- Need for security issues to be addressed within the strategy;
- Lack of clarity on Swords to City Centre BRT; and
- M50 demand management needs to be planned for.

Commentary / Response:

The component elements of the benefit to cost analysis are set out in the background technical report titled *“Outline Transport User Benefits Assessment”*. The methodology of the calculations are set out in that document.

The assessment work carried out for the *“Dublin Orbital Movement Study Options Report”*, published as a background technical report, evaluated the likely level of public transport demand for orbital movement. That assessment established that the provision of a bus-based orbital system would meet the likely future demands.

In relation to security issues, while measures are already included in relation to transport interchanges and in relation to cycling, an additional measure will be included under the “Bus Services” and “Rail Services” sections. See “Action” below. In addition, a new section 6.10 “Enforcement and Security” has been added to the draft transport strategy.

Due to increasing congestion demand management measures will be required on the M50 in the short-term.

In relation to Intelligent Transport Systems, a commitment to “[u]tilise Intelligent Transport Systems for the provision of information and services to road users of all types” has been added to section 6.11.

In respect of funding levels and project delivery, the relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

Action:

In section 6.1 “Bus Services” of the draft transport strategy, insert an additional bullet point stating: *“Appropriate measures to ensure the safety and security of bus passengers.”*

In section 6.3 “Rail Services” of the draft transport strategy, insert an additional bullet point stating: *“Appropriate measures to ensure the safety and security of rail and safety passengers.”*

Submission No. 52

Name: Martin Conneely

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Concerned that removal of Coolmine Level Crossing will lead to a major road bridge being constructed at this location.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Any proposal to develop a replacement bridge would be subject to a statutory approval process.

Submission No. 53

Name: Simon Harris, TD

Organisation: Fine Gael

Summary of Submission Comments, Issues and Recommendations:

This submission supports the broad proposals included in the draft transport strategy but identifies a number of concerns and additional proposals. Among the issues and proposals identified are:

- Concern that the NTA transport model indicates too low a transport demand for Greystones;
- Comment that the regional planning guidelines require a 49% population growth whereas the draft transport strategy predicts only a 26% increase in demand;
- Wicklow line, despite existing connection to Pearse, gets no extra diesel train slots at Pearse, unlike Kildare line, Maynooth line and Northern line;
- Additional train services required from Arklow and Greystones;
- Strategy omits mention of Fassaroe and LUAS branch to there, despite significant planned population increase in CDP;
- Creation of transport hub at Bray DART station should be progressed;
- Bus service required to Dunlavin;
- Extra park & ride facilities required at stations;
- Operational train movement arrangements to be addressed at Greystones;
- Extra bus services required;
- Provision of a footpath to Kilcoole Station and pedestrian / cycle bridge at Greystones;
- Double track north of Greystones to the tunnel;
- Provide for Rail / Luas interchange in Bray;
- Higher speeds needed from Dun Laoghaire to Sandycove; and
- Additional train stations at Newcastle and Avoca.

Commentary / Response:

The draft transport strategy provides for improvements in bus and train services (Chapter 6). Specifically, section 6.3 states “[i]ncreased passenger capacity will be provided on the South East Rail

Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones”.

The existing track arrangements south of Bray can facilitate an enhanced train service. Work carried out by the Authority indicates that the frequency of services from south of Greystones can be increased on the basis of the existing track infrastructure. By increasing the DART frequency to Greystones, there is the opportunity for an overall enhanced level of service based on interchange at Greystones.

The provision of additional park & ride facilities at stations is provided for in the published document – section 5.10.

The importance of interchange between transport modes and transport services is fully recognised in the draft transport strategy. Appropriate interchange facilities at Bray will be developed.

The population and employment projections used in the draft transport strategy align with the proposals set out in the Regional Planning Guidelines.

In relation to verification of transport demand, the transport model used in the development of the draft transport strategy has been fully calibrated and validated against base year surveys and correctly reflect actual transport movements.

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic.

Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

Provision of a footpath at Kilcoole and the provision of a pedestrian / cycle bridge at Greystones are fully supported by the draft transport strategy.

The achievement of higher speeds on the DART system between Dun Laoghaire and Sandycove is something that can be examined as part of the operational arrangements for the DART service.

In relation to the provision of additional stations on the rail network, the draft strategy states: “[o]ver the period of the Strategy, a number of additional stations will be added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Exact locations will be determined at the relevant time, but likely locations include Pelletstown on the Maynooth Line and Woodbrook on the South-Eastern Line.” This provision will facilitate the development and opening of additional stations at appropriate locations.

Submission No.54

Name: Bryan Bellew

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Supports a Leinster Outer Orbital Road

Commentary / Response:

The draft transport strategy states in section 5.8.1: *“The Leinster Orbital Route is an orbital road proposal extending from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns. It would provide connections between these towns, currently poorly served by direct linkages, supporting their economic development and improvements in orbital public transport connectivity. While this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”*

Submission No. 55

Name: Ciara O’Neill

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Concerned that removal of level crossing on the Maynooth rail line will cause significant disruption and inconvenience for local road users. Removal of level crossings can be avoided by rail crossings and signalling working more efficiently and altered position of train platforms.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at the various locations following the closure of the level crossing. Such replacement road links would, if provided, be grade-separated from the rail line i.e. they would pass over or under the railway line.

Submission No. 56

Name: Peadar Toibín, TD

Organisation: Sinn Féin

Summary of Submission Comments, Issues and Recommendations:

- Deeply concerned over the omission of a rail line to Navan.

Commentary / Response:

The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

Action: Insert at the end of section 5.2.8 the following text:

The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.

Submission No. 57

Name: Niall McMahon

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Longer term horizon is required for rail development;
- If plans exist to electrify national rail network, the applicable standard (25 KV a.c.) would be different to DART, and interchange stations between 25 KV a.c. and DART would be required to be built. Strategy to consider the location, design and ring-fencing of sites for same.; and
- Higher train frequencies required with additional signalling costs.

Commentary / Response:

Under legislation, the maximum time period that the transport strategy can extend to is twenty years.

In relation to voltage interchange sites, should the national rail network be electrified, these are items that will fall to be dealt with at the project level rather than at the level of a regional transport strategy.

The draft transport strategy does provide for higher frequency train services (Chapter 6).

Submission No. 58

Name: Donna Gartland

Organisation: Codema ('Dublin's Energy Agency')

Summary of Submission Comments, Issues and Recommendations:

- Supportive of the measures set out in the draft transport strategy to encourage more sustainable travel patterns. Recommends that the draft transport strategy includes additional evaluation and consideration of energy efficiency and fuel used.

Commentary / Response:

The objective of the draft transport strategy is "[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods." This objective focusses on "efficient" and "sustainable" movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the "Climate Action and Low Carbon Development Bill 2015". This will include provision for the preparation of a "national mitigation plan" and a "national adaptation framework". It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

Submission No. 59

Name: Bob Laird

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Demand projections seem very modest;
- Priority for delivery of projects to be based on measured economic and social benefits, with those projects giving highest return being advanced first;

- BRT concept should focus primarily on area inside M50, for short trips, with corridors to be shared with longer-distance buses;
- Supports lower cost bus and BRT solutions;
- Bus services and better timetable information should be provided; and
- Support Metro North, DART Underground, Luas to Bray, Luas to Finglas, Luas to Poolbeg but considers that Luas is unnecessary on the Lucan corridor.

Commentary / Response:

In relation to the increase in travel by 25% this refers to all journeys in the region, including journeys to schools and colleges plus- short local trips. Journeys to work do increase by a higher percentage.

Under the Public Spending Code, and reflecting good practice in any event, a comprehensive cost benefit assessment, examining all viable options, is required for any major transport project. The practice of the Authority has been to make such analyses publicly available.

The draft transport strategy strongly recognises the role of bus-based transport across the region and its fundamental role in providing the needs of the majority of public transport users across the Greater Dublin Area. Central to that role is the development of the Core Bus Network, with a much enhanced level of priority for buses on these corridors.

Bus Rapid Transit is included in the draft transport strategy and is intended to be delivered. The factors about appropriate distances for standing passengers and seating provision are acknowledged and have to be considered in the development of any BRT project in the region.

The rail proposals in the draft transport strategy have been developed on the basis of likely future transport demand, and aligning the level of public transport provision to the likely level of passenger usage along a particular corridor. Where lower capacity modes such as bus or bus rapid transit provide sufficient capacity, it is appropriate that these are proposed as the correct solution for a particular corridor. In the case of the Lucan corridor, the analysis undertaken indicates that a light rail solution is the appropriate scheme for this corridor.

Submission No. 60

Name: Brian Norton

Organisation: President DIT

Summary of Submission Comments, Issues and Recommendations:

- Supportive of the overall draft transport strategy;
- Travel to Grangegorman will involve a PT interchange for many students;
- Current positive mode split among students –figures provided; and
- Supports Blanchardstown BRT and Luas to Finglas.

Commentary / Response:

Submission is supportive of the proposals set out in the draft transport strategy.

Submission No. 61

Name: Cllr. Ronan McKenna

Organisation: Member of Meath County Council

Summary of Submission Comments, Issues and Recommendations:

- Deeply concerned over the omission of a rail line to Navan; and
- Wishes to see the advancement of the Leinster Orbital Route.

Commentary / Response:

The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

In relation to the Leinster Orbital Route, the draft transport strategy states in section 5.8.1: *“The Leinster Orbital Route is an orbital road proposal extending from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns. It would provide connections between these towns, currently poorly served by direct linkages, supporting their economic development and improvements in orbital public transport connectivity. While this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”*

Action: Insert at the end of section 5.2.8 the following text:

“The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six

years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.”

Submission No. 62

Name: Cllr. Roderic O’Gorman

Organisation: Green Party

Summary of Submission Comments, Issues and Recommendations:

- Support DART Underground and DART Expansion Programme;
- Orbital link for Blanchardstown to Airport needed;
- Development areas north of the N3 national road will have to rely on bus; and
- Engagement needed on proposed level crossing closures.

Commentary / Response:

The submission is supportive of the delivery of the DART Expansion Programme and the electrification of the Maynooth Rail Line.

The analysis undertaken in the development of the transport strategy identified that efficient bus transport provision was the appropriate solution for the area north of the N3 national road. In terms of orbital movement from the Blanchardstown area, this was assessed in the “Dublin Orbital Movement Study Options Report”, one of the background technical reports to the draft transport strategy.

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at the various locations following the closure of the level crossing. Such replacement road links would, if provided, be grade-separated from the rail line i.e. they would pass over or under the railway line. It is accepted that significant public consultations will be required in relation to the progression of such proposals.

Submission No. 63

Name: Declan Rafter

Organisation: Dublin City University

Summary of Submission Comments, Issues and Recommendations:

- Supports new Metro North but concerned over the lack of a high capacity alternative prior to the delivery of the Metro; and
- Concerned over lack of connections to DCU from north and west Dublin Regions.

Commentary / Response:

In relation to the period in advance of new Metro North becoming operational, the Core Radial Bus Corridor along Ballymun Road could, and would, be advanced. Regarding the Swords Road corridor, the draft strategy states at section 5.5.4:

“In addition, on the Swords/Airport to City Centre corridor, it will be necessary to provide a higher level of public transport capacity than the existing provision, both in advance of new Metro North and also to serve areas south of the M50 subsequent to the implementation of new Metro North. This additional capacity will take the form of a BRT service or a BRT type service or a conventional bus corridor upgrade along this route or parts of this route. The exact arrangements to be implemented will be determined in conjunction with the development arrangements for new Metro North, and will be designed to be complementary to the new Metro North proposal. Accordingly, a BRT scheme is included for development along the Swords / Airport to City Centre corridor, but its extent may be reduced or it may be modified to a conventional bus corridor upgrade, in conjunction with the development of the new Metro North project.”

In terms of orbital connections from the west side of Dublin, this was assessed in the “Dublin Orbital Movement Study Options Report”, one of the background technical reports to the draft transport strategy. That report recommended an enhanced orbital bus service, which has been incorporated into the Core Bus Network. In addition, following the delivery of new Metro North, there will be several interchange possibilities available with other elements of the rail network.

Submission No. 64

Name: Damien English, TD

Organisation: Minister for Skills, Research and Innovation, Fine Gael

Summary of Submission Comments, Issues and Recommendations:

- Supports the provision of a rail line to Navan and requests a revision to the draft transport strategy to include such a link.

Commentary / Response:

The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

Action: Insert at the end of section 5.2.8 the following text:

The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.

Submission No.65

Name: David JJ Ryan

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Opposed to level crossing closures on Maynooth Line.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 66

Name: Christine Jones

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Opposed to level crossing closures on Maynooth Line.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 67

Name: James Scallion

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Opposed to level crossing closures on Maynooth Line, particularly Coolmine and Clonsilla and the resultant traffic impacts; and
- In favour of Royal Canal cycle route and orbital cycling routes.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine and Clonsilla following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

In relation to cycling provision, the draft transport strategy proposes the delivery of the Greater Dublin Area Cycle Network Plan, which includes the extension of the Royal Canal Cycleway to Maynooth, as well as numerous other orbital routes.

Submission No. 68

Name: Charlotte Byrne

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Need to review the process of RPG/Strategy/RSES consistency;
- Need to provide for development at Fassaroe;
- Support for orbital bus route to Cherrywood; and
- Need for more DARTs in Greystones.

Commentary / Response:

The submission advocates that at the time of preparation by the Eastern and Midland Regional Assembly of a Regional Spatial and Economic Strategy, a fundamental review of land use is required. Section 7.1.1 of the draft transport strategy has been amended to include the following: *“[a]s an input to the development of the RSES, the Authority will prepare land use proposals, for consideration by the Assembly, which will seek to enhance integration between transport provision and land use, and to achieve an optimisation of the benefits to be derived from the major transport investments that form part of this Strategy.”*

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic.

Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

In terms of orbital connections from the west side of Dublin, this was assessed in the “Dublin Orbital Movement Study Options Report”, one of the background technical reports to the draft transport strategy. That report recommended an enhanced orbital bus service, which has been incorporated into the Core Bus Network. This includes the delivery of a high frequency orbital bus route along the corridor identified as “D2” in that report. While that orbital does not connect directly with Cherrywood, it provides a convenient interchange with the Luas line at Dundrum or Sandyford, availing of the Luas link directly into the heart of Cherrywood.

The draft transport strategy provides for improvements in train services (Chapter 6). Specifically, section 6.3 states *“[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones”*. The provision of additional park & ride facilities at stations is provided for in the published document – section 5.10.

Submission No. 69

Name: Paul Corcoran

Organisation: Rebuild the Silver Bridge

Summary of Submission Comments, Issues and Recommendations:

- Rebuild and repair the Silver bridge in Palmerstown for Liffey Cycleway

Commentary / Response:

The bridge does not form part of the Greater Dublin Area Cycle Network Plan.

Submission No. 70

Name: Donal O'Brolchain

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Believes that the strategy "is poorly thought through as shown by its treatment of North Dublin";
- Opposed to new Metro North;
- Opposed to BRT along the Swords / Airport to City Centre corridor; and
- Favours development of what is termed the "*City Access Transit CAT*", which comprises a number of light rail lines looped around the north city.

Commentary / Response:

In relation to the new Metro North project, the Fingal / North Dublin Transport Study examined 25 different solutions to address the long-term public transport demands along the Swords / Dublin Airport to City Centre corridor and which recommended the development of the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan. Consultation with Mr. O'Brolchain took place as part of the study and the details of the "*City Access Transit CAT*" were reviewed and assessed as part of that study.

In relation to BRT along the Swords Road corridor, the draft transport strategy states at section 5.5.4:

"In addition, on the Swords/Airport to City Centre corridor, it will be necessary to provide a higher level of public transport capacity than the existing provision, both in advance of new Metro North and also to serve areas south of the M50 subsequent to the implementation of new Metro North. This additional capacity will take the form of a BRT service or a BRT type service or a conventional bus corridor upgrade along this route or parts of this route. The exact arrangements to be implemented will be determined in conjunction with the development arrangements for new Metro North, and will be designed to be complementary to the new Metro North proposal. Accordingly, a BRT scheme is included for

development along the Swords / Airport to City Centre corridor, but its extent may be reduced or it may be modified to a conventional bus corridor upgrade, in conjunction with the development of the new Metro North project.”

Submission No. 71

Name: Peter Coghlan

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Complains about the quality and delivery of public transport planning / delivery and some aspects of town planning in Dublin to date;
- Recommends improved cycle infrastructure.

Commentary / Response:

It is acknowledged that transport planning and land use planning were not appropriately aligned in the past, and the legacies of poor planning and under-investment in public transport are at the root of many of the transport deficiencies that currently exist in the region.

In relation to cycling provision, the draft transport strategy proposes the delivery of the Greater Dublin Area Cycle Network Plan, which includes the development of an extensive network of cycling routes covering the region.

Submission No. 72

Name: Cllr. Gillian Toole,

Organisation: Member of Meath County Council

Summary of Submission Comments, Issues and Recommendations:

- Proposes bus connections from Meath towns to M3 Parkway and other locations;
- Seeks the provision of footpaths at certain locations in Co. Meath; and
- Allow car sharers to use bus lanes.

Commentary / Response:

The draft transport strategy provides for enhancements in bus services (Chapter 6), including provision for facilitating easy interchange between different transport modes.

While the proposals on footpath provision are supported in principle by the draft transport strategy, the issue of individual schemes at the local level is outside the remit of a regional transport strategy.

In relation to the use of bus lanes by multi-occupancy vehicles, bus lanes have been provided, both here and internationally, to ensure that bus-based public transport can operate reliably and at a reasonable speed, and to minimise bus delays due to traffic congestion. As bus transport is the dominant mode of

public transport in the Dublin area and in the other cities across Ireland, their continued successful performance of this role is essential for the efficiency of the overall transport system.

Since the introduction of the bus lane network, there have been numerous requests to open bus lanes to other classes of road user. These have included requests relating to motorcycles, hackneys, multi-occupancy cars and bike distribution vehicles. The issue of access for limousines has also been raised from time to time over the years.

Each request, if granted, would represent an incremental addition to bus lane usage and while it might be the case that a single addition would not undermine the overall effectiveness of the bus lane system for bus-based passenger movement, the cumulative impact would be significant and detrimental. In addition, while in some cases the numbers of vehicles involved might not be large, conceding access to bus lanes to a new class of vehicles would make it difficult to argue against doing so for other vehicle classes.

It is, therefore, the case that extending the use of bus lanes to other categories of vehicle would undermine the original purpose of, and the substantial investment in, the bus lane network. Increased access by other vehicle categories would erode the carrying capacity of these bus lanes and potentially undermine their primary role of providing bus priority in congested urban areas.

Submission No.73

Name: Cian O'Mahony, Scientific Officer

Organisation: Environmental Protection Agency

Summary of Submission Comments, Issues and Recommendations:

- Supports the aims of the strategy, particularly the proposals to increase public transport use;
- Public transport vehicles should move towards cleaner fuels;
- SEA should note the intended development by DECLG of a "Clean Air Strategy for Ireland" and the strategy should commit to its objectives;
- Strategy should take into account the National (Climate Change) Mitigation Plan;
- Recommends a tiered approach to consideration of alternatives in the SEA;
- Environment consideration should be integrated into Section 4.2 "Options Appraisal by Corridor";
- Consider the provision of appropriate storage facilities on board commuter trains for bicycles;
- Commitment to ensuring that individual strategy projects are subject to environmental assessment as part of the project development process;
- Clarity required on whether the listed projects are intended to be implemented over the lifetime of the strategy or are intended for future strategies;
- The strategy should include a commitment to take into account key environmental legislation, plans and programmes in implementing the strategy;
- Monitoring of the strategy should be undertaken; and
- Sets out what the final SEA Statement should summarise.

Commentary / Response:

The objective of the draft transport strategy is “[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.” This objective focusses on “efficient” and “sustainable” movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

Actions: Insert a new Section 8.5 into the draft transport strategy stating the following:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Comments on SEA and AA are dealt with separately.

Submission No. 74

Name: Mark McMenamin

Organisation: Riverwood Residents Association

Summary of Submission Comments, Issues and Recommendations:

- Opposed to Level Crossing Closures on Maynooth Line
- Need to have shorter level crossing closures as well
- In favour of Royal Canal cycle route and orbital cycling routes

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine and Clonsilla following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

In relation to cycling provision, the draft transport strategy proposes the delivery of the Greater Dublin Area Cycle Network Plan, which includes the extension of the Royal Canal Cycleway to Maynooth, as well as numerous other orbital routes.

Submission No. 75

Name: Cllr. Derek Mitchell

Organisation: Wicklow County Council

Summary of Submission Comments, Issues and Recommendations:

The submission states that the draft transport strategy “needs to be radically changed for Wicklow”. The submission addresses many issues related to DART services, commuter train services and bus services to the general Wicklow area. Among the various issues and proposals identified in the submission are:

- Concern that the NTA transport model indicates too low a transport demand for Greystones;
- Comments that the regional planning guidelines require a 49% population growth whereas the draft transport strategy predicts only a 26% increase in demand;
- Wicklow line, despite existing connection to Pearse, gets no extra diesel train slots at Pearse, unlike Kildare line, Maynooth line and Northern line;
- Additional train services required from Arklow and Greystones;
- Strategy omits mention of Fassaroe and LUAS branch to there, despite significant planned population increase in County Development Plan;
- Extra park & ride facilities required at stations;
- Operational train movement arrangements to be addressed at Greystones;
- Extra bus services required;
- Provision of a footpath to Kilcoole Station and pedestrian / cycle bridge at Greystones;
- Double track north of Greystones to the tunnel;
- Provide for Rail / Luas interchange in Bray;
- Higher speeds needed from Dun Laoghaire to Sandycove; and
- Additional train stations at Newcastle and Avoca.

Commentary / Response:

The draft transport strategy provides for improvements in bus and train services (Chapter 6). Specifically, section 6.3 states “*[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones*”.

The existing track arrangements south of Bray can facilitate an enhanced train service. Work carried out by the Authority indicates that the frequency of services from south of Greystones can be increased on the basis of the existing track infrastructure. By increasing the DART frequency to Greystones, there is the opportunity for an overall enhanced level of service based on interchange at Greystones. In addition, the strategy does not preclude further track enhancements along this corridor - section 5.2.8 states: “*[a]dditional track works to enhance service efficiency*”.

The provision of additional park & ride facilities at stations is provided for in the published document – section 5.10.

The importance of interchange between transport modes and transport services is fully recognised in the draft transport strategy. Appropriate interchange facilities at Bray will be developed.

The population and employment projections used in the draft transport strategy align with the proposals set out in the Regional Planning Guidelines.

In relation to verification of transport demand, the transport model used in the development of the draft transport strategy has been fully calibrated and validated against base year surveys and correctly reflect actual transport movements.

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic.

Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

Provision of a footpath at Kilcoole and the provision of a pedestrian / cycle bridge at Greystones are fully supported by the draft transport strategy.

The achievement of higher speeds on the DART system between Dun Laoghaire and Sandycove is something that can be examined as part of the operational arrangements for the DART service.

In relation to the provision of additional stations on the rail network, the draft strategy states: “[o]ver the period of the Strategy, a number of additional stations will be added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Exact locations will be determined at the relevant time, but likely locations include Pelletstown on the Maynooth Line and Woodbrook on the South-Eastern Line.” This provision will facilitate the development and opening of additional stations at appropriate locations.

Submission No. 76

Name: John Fanning

Organisation: Various

Summary of Submission Comments, Issues and Recommendations:

- Supports the provision of the Navan Rail line; and
- Proposes a rail link from Dublin Airport to Pace.

Commentary / Response:

The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

In relation to the provision of a rail line to Ashbourne, serving Dublin Airport and connecting to the existing network at Pace, the level of passenger demand on this corridor would not justify the provision of a rail service.

Action: Insert at the end of section 5.2.8 the following text:

The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.

Submission No. 77

Name: Mairéad Forsythe

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Concerned that the Templeogue area is not served in the draft transport strategy.

Commentary / Response:

The Templeogue area has been appropriately considered in the development of the draft transport strategy. The indicative route for the Clongriffin to Tallaght Bus Rapid Transit Scheme does traverse the Templeogue area.

In addition the draft transport strategy sets out the objective of enhancing bus services, including the frequency of bus services. In terms of cycling infrastructure, the Greater Dublin Area Cycle Network Plan proposes a comprehensive cycling network that will benefit the Templeogue area.

Submission No. 78

Name: Howard Knott

Organisation: IEA Rail Freight Group

Summary of Submission Comments, Issues and Recommendations:

- Concern over amount of attention given to freight in the draft transport strategy; and
- Proposes that consideration be given to a Road / Rail hub at Kishogue.

Commentary / Response:

Section 5.8.4 of the draft transport strategy recognises the important role of freight and sets out various proposals in relation to its movement. It notes:

“Given the geographic size of Ireland and the proximity of Dublin Port to the various centres in the GDA, movement by road is, and will continue to be, the dominant mode of freight transfer in the region, and throughout the wider State. Accordingly, the management of the strategic (national) road network within the GDA is critical to the overall efficiency of freight movement. 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.”

While movement by freight by rail will continue to be encouraged, the draft transport strategy does not propose the development of a road/rail interchange at Kishogue, for the reasons set out above and the resultant transport economics.

Section 5.8.4 of the draft transport strategy has been amended to include: *“[t]he Authority will also take account of any relevant findings and recommendations emerging from the proposed national sustainable and competitive freight policy and the review of rail policy which the Department of Transport, Tourism and Sport has committed to undertake.”*

Submission No. 79

Name: Jonathan Roche

Organisation: GoCar Car Sharing Ireland

Summary of Submission Comments, Issues and Recommendations:

- Wishes to see the role of car sharing promoted; and
- Wishes to establish a working group to integrate car sharing into PT network.

Commentary / Response:

Section 5.9 of the draft transport strategy recognises the role of car sharing. It states:

“Support and facilitate the implementation and expansion of:

-
- *Car club schemes, car-pooling and car sharing.*”

The setting up of a working group related to car sharing can be established , if required, outside the ambit of a regional transport strategy.

Submission No. 80

Name: Anne Sheridan

Organisation: Kirkpatrick Rockfield Coolmine Residents’ Association

Summary of Submission Comments, Issues and Recommendations:

- Not enough consultation time;
- No report for D.15 – BRT study should have been published with the strategy;
- BRT study for D.15 was too narrow and old;
- Support for Royal Canal Greenway;
- Concern over impact of BRT and its ability to serve Navan Road;
- Concern over closure of level crossings;
- Requirement for Blanchardstown to Dublin Airport link;
- Opposed to demand management on the M50 and radial roads;
- Opposed to on-street parking controls and parking charges at out-of-town shopping centres.

Commentary / Response:

The comment in relation to consultation time is noted. However, the submission that has been provided is comprehensive.

In relation to the issue of the level of analysis carried out for the Dublin 15 area, the draft transport strategy proposes, *inter alia*, the following transport schemes to serve Dublin 15:

- Blanchardstown to UCD Bus Rapid Transit (BRT);
- DART from Dublin City Centre to Maynooth;
- Dublin Outer Orbital Core Bus Route; and
- Upgrade of the N3 from the M50 junction to Mulhuddart.

It should be noted that the draft transport strategy builds on the extensive work done for the previous draft transport strategy published in 2011 and on subsequent work undertaken since that document’s publication.

In terms of radial movement from Dublin 15 to Dublin City Centre, the Blanchardstown bus corridor was identified as a Priority 1 Quality Bus Corridor as part of the previous 2011 Draft Transport Strategy. Measure “BUS 7” of that document stated that the Authority would explore the potential to upgrade these corridors to BRT levels of service.

Following on from this, the Authority carried out an extensive transport planning exercise on the Blanchardstown Corridor, i.e. the Navan Road, N/M3, Dublin 15 area, in order to fully determine its future transport infrastructure requirements. This work formed part of the “*Bus Rapid Transit (BRT) Core Dublin Network*” report, which was published at the end of 2012. Subsequently, in February 2014 the

Authority published its proposals for three BRT corridors, one of which was the Blanchardstown to UCD corridor.

Indicative route maps, inclusive of potential stop locations, were published for the proposed Blanchardstown to UCD BRT scheme, along with extensive information on the overall BRT concept. A public consultation process was undertaken in relation to those proposals during the months of February and March, 2014. Further development of this project has been on-going since that public consultation stage, and all of this work was assimilated into the development of the recently published draft transport strategy.

In addition to the BRT proposal, extensive work was also undertaken in the development of the DART Expansion Programme, whose updated business case was published on the Authority's website in September of this year. That business case assessed, and reported on, the level of transport users likely to avail of the electrified and resignalled Maynooth line, serving various stations in the Blanchardstown, Castleknock and Clonsilla areas.

While most of the above work addressed movements along the radial corridor linking the Dublin 15 area to the city centre, a significant portion of movements are orbital, particularly southwards towards Tallaght and Clondalkin. One of the technical reports accompanying the strategy is titled "*Dublin orbital Movement Study – Options Report*". That report sets out the findings of a comprehensive assessment of orbital movement, and proposes various orbital corridors, including linkages to Blanchardstown, which have been incorporated into the draft transport strategy proposals.

In addition to the public transport elements, Transport Infrastructure Ireland, formerly the National Roads Authority, have examined the issue of road capacity and road layout on the N3 / M3 section between Dunboyne and the M50. They are developing proposals to address various deficiencies along this section of national road and the strategy has provided for the implementation of those proposals. In addition, they have carried out, and published, a major study on demand management on the M50 motorway, and the recommendations of that work have also been incorporated.

Accordingly, it is the case that extensive transport assessment has been carried out in the general Dublin 15 area for the purposes of preparing the draft transport strategy. The document has fully included the outcome of that work as part of its overall suite of transport proposals.

In relation to cycling provision along the Royal Canal, the draft transport strategy proposes the delivery of the Greater Dublin Area Cycle Network Plan, which includes the extension of the Royal Canal Cycleway to Maynooth, as well as numerous other orbital routes.

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

Assessment work carried out as part of the "*Dublin Orbital Movement Study Options Report*" examined the need for orbital movement northwards of Blanchardstown, including examination of a connection between Dublin Airport and Blanchardstown. Following that assessment the report recommended the development of the option identified as "A2" in that report and this has been included as part of the Core Bus Network.

While the concerns regarding demand management on the M50 are noted, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively.

In relation to out of town shopping centres, the draft transport strategy states (section 5.9) the objective to: *“[a]ssess the need for the introduction of parking charges at out-of-town retail centres, to reduce the congestion potential at these locations”*.

Submission No. 81

Name: Terry Prendergast

Organisation: Grangegorman Development Agency

Summary of Submission Comments, Issues and Recommendations:

- Supportive of the overall draft transport strategy;
- Travel to Grangegorman will involve a PT interchange for many students;
- Current positive mode split among students –figures provided; and
- Supports Blanchardstown BRT and Luas to Finglas.

Commentary / Response:

Submission is supportive of the proposals set out in the draft transport strategy.

Submission No. 82

Name: Stephen Sealey

Organisation: Brown Thomas

Summary of Submission Comments, Issues and Recommendations:

- General support for the provisions of the strategy;
- Need to maintain car access to city centre retail; and
- Recommends addressing the approximately 10,000 free public sector parking spaces in the city centre.

Commentary / Response:

The importance of retail activity to the vitality and economic well-being of Dublin City Centre is fully acknowledged. While the draft transport strategy is a regional transport strategy, it aligns and facilitates the various proposals that have been separately published, jointly with Dublin City Council, in the Dublin City Centre Transport Study. Following on from a separate consultation in relation to that transport study, extensive engagement is on-going in relation to car park access for retail purposes in the City Centre. The objective of that engagement is to ensure an adequate and acceptable level of access to car parks for retail activity.

Section 5.11 of the draft transport strategy states that it is intended to *“[l]imit the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available”*.

Submission No. 83

Name: Odran Reid, Strategy Coordination Manager

Organisation: Northside Partnership

Summary of Submission Comments, Issues and Recommendations:

- Seeks clarification that significant permitted development in the Beaumont and Darndale areas have been incorporated into the strategy;
- Proposes the sub-division of the northern orbital into an inner and outer orbital; and
- Supportive of the Santry River Greenway.

Commentary / Response:

The employment and population projections used in the development of the draft transport strategy do incorporate the development potential of the Beaumont and Darndale areas, and these projections have been built into the transport model used for the assessment of the various proposals.

The Core Bus Network, incorporating the Orbital Bus Routes, represents *“the most important bus routes in the region, and are generally characterised by a high frequency of bus services, high passenger volumes and with significant trip attractors located along the route”* (section 5.5). It also states: *“[w]hile this network represents the core high frequency bus routes, it is supplemented by other bus services operating on lower frequency routes and by local buses running on other routes.”*

The draft transport strategy does incorporate the delivery of the Greater Dublin Area Cycle Network Plan, which includes the development of Santry River Greenway.

Submission No. 84

Name: Pauline Foster

Organisation: Recorder’s Residents’ Association

Summary of Submission Comments, Issues and Recommendations:

- Considers that strategy ignores Terenure and environs;
- Improvements to bus services proposed.

Commentary / Response:

The Terenure area has been appropriately considered in the development of the draft transport strategy. The indicative route for the Clongriffin to Tallaght Bus Rapid Transit Scheme does traverse the Terenure area.

In addition the draft transport strategy sets out the objective of enhancing bus services, including the frequency of bus services.

In terms of cycling infrastructure, the Greater Dublin Area Cycle Network Plan proposes a comprehensive cycling network that will benefit the Terenure area.

Submission No. 85

Name: Cllr. Andrew Montague

Organisation: Member Dublin City Council

Summary of Submission Comments, Issues and Recommendations:

- Need to avoid causing severance with transport proposals (e.g. Metro Ballymun);
- Fast-track the delivery of the Cycle Network Plan;
- Promote contra-flow cycling;
- Expand the *dublinbikes* scheme;
- Consider single bored tunnels for new Metro North instead of twin tunnel tubes;
- Implement additional toll points on the M50;
- Provide for car park charges at out-of-town retail centres;
- Improve public transport provision between M1 and Malahide Road on the northside of the city; and
- Introduce more integrated public transport fares.

Commentary / Response:

In relation to severance issues, there is always a balance to be achieved where a high volume transport corridor traverses a central community area. This is something that has to be dealt with at the individual project level rather than at the level of a regional transport strategy.

It is accepted that the pace of development of the Greater Dublin Area Cycle Network Plan is much slower than desirable. This reflects the scarcity of funding in recent years, for understandable reasons, with some resource issues also having an impact.

Contra-flow cycling is supported by the draft transport strategy and will be developed.

The draft transport strategy states in section 5.6:

“To complement the investment in the cycle network, it is intended to:

-
- *Seek the expansion of the bike share scheme in Dublin City (dublinbikes) and the introduction of similar schemes in other appropriate centres across the GDA”.*

In developing the new Metro North proposals, the issue of single versus twin tunnels will be reassessed. However, this does not indicate a commitment to adopt a single bore approach.

The draft transport strategy does provide for the introduction of demand management measures on the M50, which is likely to take the form of additional toll points.

In relation to out of town shopping centres, the draft transport strategy states (section 5.9) the objective to: *“[a]ssess the need for the introduction of parking charges at out-of-town retail centres, to reduce the congestion potential at these locations”.*

Regarding public transport provision in the areas referred to in the submission, there are BRT and bus proposals (both radial and orbital) stated for delivery in these areas. In addition, section 6 of the draft transport strategy sets out objectives to increase bus services in line with demand increases.

Section 6 of the draft transport strategy also addresses the issue of fares and states:

“It is proposed that:

- A simplified fare system will be introduced in the Greater Dublin Area, covering bus, rail, Luas and Metro services, which will also facilitate multi-leg and multi-modal journeys in a cost effective manner;*
- All bus services will migrate to a cashless system, to facilitate driver safety and faster passenger boarding times; and*
- The current Leap card system will be further developed with new products and services added and will, over time, transition to an account based system using mobile phones and/ or other payment methods as new technologies mature.”*

Submission No. 86

Name: David O'Connor

Organisation: Dublin Institute of Technology

Summary of Submission Comments, Issues and Recommendations:

- Supports the Core Bus Network but seeks clarification as to the extent that it was informed by the land use planning framework;
- Review of the strategy needed after the publication of the “Regional and Economic Strategy” to be published next year;
- Queries whether 8% mode shift is sufficient to meet obligations under EU white paper “Roadmap to a Single European Area”;
- Queries use of the term “seasoned campaigners” in section 1.3; and
- Seeks establishment of a “Dublin Transport Advisory Council”.

Commentary / Response:

The Core Bus Network, and the other elements of the draft transport strategy, were informed by the projected population and employment projections associated with the planned land use patterns.

The draft transport strategy, if adopted, is required to be reviewed within six years of its adoption. The position in relation to alignment with, and implications arising from, the “Regional and Economic Strategy” to be published next year, will be assessed at that point.

In relation to the objectives set out in the EU white paper “Roadmap to a Single European Area”, other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

A new section 8.5 will be added to the draft transport strategy to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

In section 1.3, the words “seasoned campaigners” will be replaced with “various groups and organisations”.

In relation to the establishment of a “Dublin Transport Advisory Council”, Section 17 of the Dublin Transport Authority Act 2008, provides for the establishment of a “Dublin Transport Authority Advisory Council”. The establishment of this body, which is by way of Ministerial regulation, has not yet taken place.

Actions: Insert a new Section 8.5 into the draft transport strategy stating the following:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Actions: In section 1.3, replace the words “seasoned campaigners” with “various groups and organisations”.

Submission No. 87

Name: Frank Lynch

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Concerned about the proposed closure of the level crossing at Coolmine and the impact of a new road link inclusive of bridge construction.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the period of closure of the road crossings will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, need to address, as part of its development, the types of issues set out in the submission.

Submission No. 88

Name: Nat O'Connor

Organisation: TASC's Economists' Network

Summary of Submission Comments, Issues and Recommendations:

- Concerned about the absence of socio-economic analysis in relation to the draft transport strategy;
- Absence of metrics on measuring congestion and how Dublin compares with other cities;
- Lack of an overall public transport network map covering the full region;
- No detail provided on the levels of public transport subsidies;
- Integration with land use proposals is not clear;
- No evidence of integration with other Government departments' strategies; and
- Lack of easy interface between modes of transport.

Commentary / Response:

The draft transport strategy has been subject to socio-economic analysis which is reported in the background technical document "*Outline Transport User Benefits Assessment*".

The GDA Transport Model allows calculation of journey times which an essential component of defining congestion. This model has been used extensively in developing the proposals set out in the draft transport strategy. The background technical document "*Outline Transport User Benefits Assessment*" reports the assessment of the transport user benefits arising from the draft transport strategy, which are €12.4 billion, made up predominately of journey time savings.

The draft transport strategy is required to set the overall transport strategy for the region. A more granular level of detail will be developed subsequently in relation to bus and other services at the county and local level.

The purpose of the draft transport strategy is to establish the transport provision that will be required in the future. In relation to the level of operating subsidy required to support subsidised public transport services, this will be a function of the level of usage and the relevant fares revenue, which are areas that will require to be addressed on an on-going basis during the full period of any adopted strategy. However, section 9.3.6 of the draft transport strategy provides an indication of the current level of subsidy and the likely future level as the public transport network expands.

In relation to land use and discussion of land zoning and future housing development patterns, the remit of the draft transport strategy is to serve the land use decisions set out in other policies, such as the Regional Planning Guidelines and local authority development plans, plus the “Regional and Economic Strategy” to be published next year. However Chapter 7 of the document does discuss and set out principles for land use and transport integration. In addition, while land use policy is not within the remit of the Authority, section 7.1.1 now provides that *“[a]s an input to the development of the RSES, the Authority will prepare land use proposals, for consideration by the Assembly, which will seek to enhance integration between transport provision and land use, and to achieve an optimisation of the benefits to be derived from the major transport investments that form part of this Strategy.”*

The same position applies in relation to other policies set by various Government departments, such as in the health area.

The draft transport strategy sets out various proposals in Section 6.6 for optimising transport interchange.

Submission No. 89

Name: John Fingleton

Organisation: Fingleton White

Summary of Submission Comments, Issues and Recommendations:

- Requests that the value of pipelines for the transport of appropriate materials should be included in the transport strategy.

Commentary / Response:

The provision of pipelines for the transport of various materials such as aviation fuel, is a matter that requires to be addressed as part of land use planning.

Submission No. 90

Name: Cllr. Alan Tobin

Organisation: Member of Meath County Council

Summary of Submission Comments, Issues and Recommendations:

- Requests consideration of enhancement to bus and rail services in Stamullen;
- Cycleways and footpaths required to Gormanston college plus footpath improvements between Gormanston rail station and Balbriggan;
- Provide a rail link between Dublin Airport and Ashbourne;
- Extend the M2 motorway and develop the Slane bypass;
- Develop the Leinster Orbital Route;

- Further develop the cycling network;
- Revise and improve bus routes;
- Put a greater emphasis on footpath construction; and
- Put a tax on fuel and abolish tolls.

Commentary / Response:

The draft transport strategy proposes in Sections 6.1 and 6.3 enhancements to bus and rail services.

Provision of footpaths and cycleways in the Stamullen and Gormanston area are supported by the draft transport strategy.

In relation to the provision of a rail line to Ashbourne, serving Dublin Airport and connecting to the existing network at Pace, the level of passenger demand would not justify the provision of a rail service.

Section 5.8.1 of the draft transport strategy provides for “[e]nhancements of the N2/M2 national route inclusive of a bypass of Slane”.

In relation to the Leinster Orbital Route, the draft transport strategy (Section 5.8.1) “[w]hile this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”

The Greater Dublin Area Cycle Network Plan provides for an improved cycle linkage between Ashbourne and Rathoath (Route M15).

Decisions on national taxation are outside the ambit of a regional transport strategy.

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- Extend the M2 motorway and develop the Slane bypass;
- Develop the Leinster Orbital Route;
- Further develop the cycling network;
- Revise and improve bus routes;
- Put a greater emphasis on footpath construction; and
- Put a tax on fuel and abolish tolls.

Commentary / Response:

The draft transport strategy proposes in Sections 6.1 and 6.3 enhancements to bus and rail services.

Provision of footpaths and cycleways in the Stamullen and Gormanston area are supported by the draft transport strategy.

In relation to the provision of a rail line to Ashbourne, serving Dublin Airport and connecting to the existing network at Pace, the level of passenger demand would not justify the provision of a rail service.

Section 5.8.1 of the draft transport strategy provides for “[e]nhancements of the N2/M2 national route inclusive of a bypass of Slane”.

In relation to the Leinster Orbital Route, the draft transport strategy (Section 5.8.1) “[w]hile this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”

The Greater Dublin Area Cycle Network Plan provides for an improved cycle linkage between Ashbourne and Rathoath (Route M15).

Decisions on national taxation are outside the ambit of a regional transport strategy.

Submission No. 91

Name: Frank Austin, Director of Services

Organisation: Dun Laoghaire Rathdown County Council

Summary of Submission Comments, Issues and Recommendations:

This submission is supportive of the proposals set out in the draft transport strategy and sets out a number of changes and additions for consideration as follows:

- Extension of the Green Line should not be contingent upon its upgrade to metro;
- Recognition of the importance of infrastructure development and the need for additional investment in such development on the Core Bus Network corridors;
- Consider facilitating the provision of the “Blue Line” BRT proposal;
- Include provision of introduction of bike share schemes to “areas”;
- Strategy should acknowledge need to support the delivery of the GDA Cycle Network Plan;
- Proposed change to the draft transport strategy wording relating to the Eastern Bypass;
- Comment in relation to the “principles of road development”;
- Additional demand management objective related to area wide smarter travel planning;
- Clarification on park and ride facilities north of Bray;
- Suggestion for further guidance on setting maximum parking standards; and
- Suggestion removal of reference to “area based parking caps”.

Commentary / Response:

The reason for upgrading the Luas Green Line to a metro operation, which means the system is fully segregated from road traffic, is that with the growth of areas such as Sandyford and Cherrywood, the existing Luas system will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional

capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation. Accordingly, while the desire to further extend Luas to serve the Old Conna area is recognised, it does require the capacity issues on the existing Green Line to be addressed in advance of that provision.

The challenges in developing the necessary infrastructure to provide the necessary priority for the Core Bus Network is acknowledged, and will require significant investment.

In relation to the Blue Line BRT proposal, part of the proposed Blanchardstown to UCD BRT scheme serves parts of the same corridor. To allow for its future further extension southwards, the text in section 5.5.4 will be amended to insert the additional text after the listing of the two BRT schemes: *“The routes of these two BRT schemes are indicative and subject to design development. Such design development may include changes to the routes and /or terminal points of the schemes, including further extension of the routes.”*

The reference to the expansion of bike share schemes in section 5.6 will be amended as suggested.

In relation to the Greater Dublin Area Cycle Network Plan, the draft transport strategy fully commits to its delivery as stated in the fifth paragraph of section 5.6. The need for substantial funding investment to achieve this is acknowledged.

In relation to the Eastern Bypass, the existing wording in the draft transport strategy, while wider in scope than the wording in the draft development plan, does not preclude the objectives of the provision in the draft development plan statements. In addition, it is not clear that the DLR wording would be acceptable to TII. For the above reasons it is not proposed to amend the wording on the Eastern Bypass in the draft transport strategy.

Section 5.8.3 “Principles of Road Development” has been careful not to establish an inappropriate obstacle to the development of necessary road infrastructure. It does not set a requirement of not permitting any increase in car trips from a road development, but requires, inter alia, that such development does not significantly diminish the beneficial outcomes of the strategy. Accordingly, it is considered that the concerns expressed have been appropriately addressed within the principles.

In relation to the suggestion for an additional demand management objective related to area wide smarter travel planning, it is considered that this is already encompassed in the concluding bullet points of section 5.9. This states that it is intended to:

“Support and facilitate the implementation and expansion of:

- *Workplace Travel Plans for all large employers;*
- *Tailored travel planning information provision for residential areas;*
- *Travel Plans for schools, colleges and all education campuses; and*
- *Car club schemes and car sharing.”*

However, for completeness, the second bullet point above will be amended to state “Tailored travel planning information provision for residential and commercial/retail areas;

In relation to park and ride facilities north of Bray, the following amendments will be inserted. The second sentence of the first bullet point of section 5.10 will be amended to state: *“These facilities are, or would be, located at Swords, Finglas, Dunboyne, Liffey Valley, Naas Road, Carrickmines, Woodbrook and Greystones (see Figure 5.11).”*

In relation to the provision of more detailed guidance on parking standards, it is considered that this would be best addressed outside of the transport strategy.

While the challenges associated with area based parking caps are acknowledged, it is considered that they are important in certain locations. As the operative verb is “to promote” rather than a commitment to implement, it is proposed to retain the reference to parking caps.

Action: Insert the following text as the second last paragraph of section 5.5.4:

“The routes of these two BRT schemes are indicative and subject to design development. Such design development may include changes to the routes and /or terminal points of the schemes, including further extension of the routes.”

Action: In the third bullet point of section 5.6 replace “appropriate centres” with “appropriate centres and areas”.

Action: In section 5.9, replace the sub-bullet point stating “Tailored travel planning information provision for residential areas” with “Tailored travel planning information provision for residential and commercial/retail areas”.

Action: Replace the second sentence of the first bullet point of section 5.10 to state: “These facilities are, or would be, located at Swords, Finglas, Dunboyne, Liffey Valley, Naas Road, Carrickmines, Woodbrook and Greystones (see Figure 5.11).”

Submission No. 92

Name: Kieran Boyle

Organisation: On behalf of Cosgrave Property Development Limited

Summary of Submission Comments, Issues and Recommendations:

- Welcomes the planned north-south light rail link connecting Swords to Bray and the opportunity for this rail axis to “directly serve the planned growth of Bray at Old Conna and Fassaroe.”

Commentary / Response:

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic.

Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

Submission No. 93

Name: Eoin Plant

Organisation: Dublin Institute of Technology

Summary of Submission Comments, Issues and Recommendations:

- Proposes the development of a urban delivery centre for the disaggregation of large loads.

Commentary / Response:

While there is nothing in the draft transport strategy precluding the development of such a centre, a commercial development is Dublin Port which sought to operate on a similar basis was closed on the basis that it was not commercially viable.

Submission No. 94

Name: Cllr. Tom Kelly

Organisation: Member of Meath County Council

Summary of Submission Comments, Issues and Recommendations:

- Provide a rail service to Dublin Airport from Dublin and Belfast;
- Use wind power as the energy source;
- Provide a DART service to Drogheda; and
- Provide a bypass of Julianstown, Duleek and Slane. Alternatively, develop the Leinster Orbital Route.

Commentary / Response:

The issue of a rail connection to Dublin Airport was dealt with in the the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

Wind power is outside the remit of the regional transport strategy.

The DART Expansion Project provides for an electrified DART service to Drogheda.

Section 5.8.1 of the draft transport strategy provides for “[e]nhancements of the N2/M2 national route inclusive of a bypass of Slane”.

In relation to the Leinster Orbital Route, the draft transport strategy (Section 5.8.1) “[w]hile this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”

Submission No.95

Name: Ben Waite, ILTP

Organisation: On behalf of Tudor Homes

Summary of Submission Comments, Issues and Recommendations:

- Concerned that the proposals in the draft transport strategy have the potential to frustrate the early delivery of the Cherrywood SDZ; and
- Considers that the Luas extension to Bray and the upgrade of the Green Line to metro standard are both unnecessary.

Commentary / Response:

Nothing stated in the draft transport strategy is intended to frustrate the development of the Cherrywood SDZ in line with its planning scheme.

The reason for upgrading the Luas Green Line to a metro operation, which means the system is fully segregated from road traffic, is that with the growth of areas such as Sandyford and Cherrywood, the existing Luas system will not have the capacity to carry the predicted future number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation. Accordingly, to address the full needs of this corridor, the capacity issues on the existing Green Line are required to be addressed.

The Bray area is intended to grow significantly under the provisions of the Regional Planning Guidelines and the relevant development plans. The further extension of the Luas Green Line is required to cater for this growth.

Submission No.96

Name: Christy O’Sullivan, ILTP

Organisation: On behalf of Sainfoin Property Company

Summary of Submission Comments, Issues and Recommendations:

- Fully supports new Metro North and requests its acceleration; and
- Supports the early delivery of local roads in the Fingal area.

Commentary / Response:

The timing of the development of new Metro North has been set out in the Government's recently announced Capital Plan.

Submission No. 97

Name: Ken Swaby, ILTP

Organisation: On behalf of Bovale Developments

Summary of Submission Comments, Issues and Recommendations:

This submission sets out a review of the proposals set out in the draft transport strategy and sets out a number of recommendations for consideration as follows:

- Include an objective that “access to Dublin Port and Dublin Port should be safeguarded and improved through the implementation of high capacity rail and local road improvements”;
- Include an objective to “identify local road schemes for the protection and enhancement of the person trip capacity of the strategic road network, particularly the M50, and seek implementation by local authorities of identified schemes”;
- Add an objective that “the Authority will seek the early construction of the approved Metro North Scheme between the Swords Area and St. Stephen's Green”;
- Include an objective stating “seek the provision of strategic rail based park and ride facility at the Northern Terminus of Metro North”;
- Include an objective to “develop a network of strategic rail-based park and ride facilities at appropriate points on the national road network, adjacent to, and outside of, the M50. These facilities would be located at Swords, Finglas/Balseskin, Dunboyne, Liffey Valley, Naas Road and Greystones”;
- Add an objective stating “new high quality public transport should be provided to serve areas zoned for Residential and/or Commercial Development along key corridors such as the MNEC”; and
- Insert the following measure: “Focus person-trip intensive commercial and residential development on locations served by stations on the existing rail network and the revised Metro North.

Commentary / Response:

Having considered the various suggested insertions and the rationale for their proposed inclusion, it is considered that it is not either necessary or appropriate to include the suggested amendments. In many cases the existing text already adequately addresses the issue.

Submission No. 98

Name: Ken Swaby, ILTP

Organisation: On behalf of Waterstown Land Co-Owners

Summary of Submission Comments, Issues and Recommendations:

This submission sets out a review of the lands of Waterstown Land Co-Owners in Sallins, Co. Kildare in the context of the draft transport strategy and other relevant policies. It sets out a number of comments and recommendations for consideration as follows:

- It identifies Sallins as one of the best locations in Kildare to accommodate further population and employment growth, by virtue of its rail, bus, road and greenway connectivity; and
- It recommends that greater emphasis be given to such locations in the draft transport strategy.

Commentary / Response:

The location of population and employment potential and designation is determined by the Regional Planning Guidelines and local authority development plans. The objective of the draft transport strategy is to support such designations with appropriate transport provision.

Submission No. 99

Name: Eamonn O'Brien

Organisation: Chairman, Croke Park Streets Committees Limited

Summary of Submission Comments, Issues and Recommendations:

- Expresses concern over the omission of a rail station at Croke Park.

Commentary / Response:

Croke Park is currently served by Drumcondra Station and it is proposed that this arrangement would continue.

Submission No. 100

Name: Cllr. David Healy

Organisation: Member of Fingal County Council

Summary of Submission Comments, Issues and Recommendations:

This submission sets out a number of concerns in relation to the Environmental Report as follows:

1. That the Environmental Report fails to supply information which is required to be provided;
2. That the Environmental Report fails to consider alternatives;
3. That the Environmental Report does not evaluate the draft Strategy against the Strategic Environmental objectives;
4. That the stated predictions in the Environmental Report are contrary to the estimates derived from the transport modelling;
5. That the draft Strategy is not designed to meet the Strategic Environmental Objectives;
6. That, insofar as the Strategy will lead to a breach of Ireland's EU law obligations as regards emissions and ambient air pollution concentrations, it is illegal;
7. That the Strategy is not compatible with the National Policy Position on Climate Action and Low Carbon Development adopted by the Government in 2014; and
8. That it will not be possible to adopt this draft strategy when the Climate Action and Low Carbon Development Bill is enacted.

Commentary / Response:

1. It is agreed that the SEA Environmental Report does not quantify detailed impacts. The appropriate information required under the relevant legislation has been included in the Environmental Report. Annex 1 of Directive 2001/42/EC sets out what is required to be included and addressed in the Environmental Report. The Environmental Report prepared for the "Draft Transport Strategy for the Greater Dublin Area 2016 – 2035" complies in full with those requirements. It should be noted that Strategy is a high level, strategic document with a blend of different types of provisions, ranging from permitted projects to high level policies and intentions. As such it, and the information required to be included in the SEA, differs from the level of detail available at individual project level. It would be premature and speculative for the SEA to include quantified [i.e. project level] predictions of emissions due to
 - the lack of relevant detail for high-level specific policies and intentions
 - uncertainty regarding the progression of different individual projects
 - uncertainty regarding combinations of individual projects policies and policies referred to in the Strategy.

The resultant material would purport to provide reliability based data that would be based upon an excessively wide range of variance in data. Such spurious data would be highly misleading.

Notwithstanding this, baseline data included in the SEA Environmental Report will be expanded to include the information provided by the EPA in their submission.

2. It is incorrect to state that "*the Environmental Report fails to consider alternatives*". Section 6 of the Environmental Report does set out the alternatives considered, while the subsequent Section evaluates those alternatives. The draft Strategy is a high level, strategic document with a blend of different types of provisions. This blend includes high level policies and intentions –

many of which relate to specific projects which are at various stages of permitting. Although further modelling and further consideration of alternatives and outputs could be undertaken for the Strategy, such an approach would produce spurious data, be internally inconsistent and would be subject to various limitations. Due to the extent of uncertainty regarding the progression of different individual projects and the progression of combinations of individual projects referred to in the Strategy it is appropriate and consistent with environmental assessment legislation for lower tier transport and land use planning and applications to give further consideration to alternatives (see Figure 3.2 'Hierarchy of Planning and Environmental Assessment' in SEA Environmental Report).

3. It is incorrect to state that "*the Environmental Report does not evaluate the draft Strategy against the Strategic Environmental objectives*". Section 5 of the Environmental Report does set out the Strategic Environmental Objectives (SEOs). Section 7 of the document includes an evaluation of the alternatives considered against the SEOs. Section 8 includes an analysis of the draft Strategy provisions against the SEOs, with Section 8.6 providing a detailed evaluation of the Strategy provisions assessed against the SEOs.
4. Notwithstanding this, the SEA Environmental Report will be updated to include more specific targets from relevant legislation cited in the Environmental Report. The Environmental Report will note that the implementation of individual elements of the Transport Strategy will consider and contribute towards achieving these targets.
5. There is no inconsistency between the findings of the Environmental Report and the information provided in the background Transport Modelling Report. The Transport Modelling report indicates that, in a simplified emissions trend analysis function available within the transport modelling software, all of the emission values reduce when the Strategy provisions are compared with the position without the Strategy in place, indicating the positive benefits of delivering the Strategy. The nature of this modelling is simplified and conservative in nature but sufficiently robust to confirm the trend position in relation to emissions. The modelling study was used as a policy decision support tool not an emissions prediction tool. The SEA Environmental Report will be updated to further clarify these findings.
6. As stated in the SEA Environmental Report (Section 5) Strategic Environmental Objectives (SEOs) are:

methodological measures developed from policies which generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives which have been transposed into Irish law and which are required to be implemented. The SEOs are set out under a range of topics and are used as standards against which the provisions of the Draft Strategy and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects - unmitigated.

The SEA has shown that the Strategy will contribute towards the achievement of legislative objectives to which the SEOs relate.

7. It is noted that the statement “[t]hat insofar as the Strategy will lead to a breach of Ireland’s EU law obligations as regards emissions and ambient air pollution concentrations, it is illegal” is a conditional statement. The Strategy will comply with the legislative requirements applicable to it, and will substantially assist in Ireland meeting its obligations in the area of emissions and air quality. To provide greater clarity on this matter, it should be noted that a new section 8.5 will be added to the draft transport strategy stating:

Action: Insert a new Section 8.5 into the draft transport strategy stating the following:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

8. The Strategy is fully compatible with the National Policy Position on Climate Action and Low Carbon Development. The additional section 8.5 above, confirms that the implementation of the Strategy will incorporate the relevant targets and actions arising from the “national mitigation plan” and the “national adaptation framework” to be adopted under the provisions of the Climate Action and Low Carbon Development Bill 2015, when enacted.
9. Given the provisions of the Strategy, including section 8.5 referred to above, this draft transport strategy can be adopted following the enactment of the Climate Action and Low Carbon Development Bill 2015.

Submission No. 101

Name: Niall Cussen

Organisation: Department of Environment, Community & Local Government

Summary of Submission Comments, Issues and Recommendations:

- The Department is developing a National planning Framework (NPF) and a Regional Spatial and Economic Strategy (RSES) commencing in 2016. The NPF will be a successor to the National Spatial Strategy and the RSES will replace the former RPGs. Section 23(7)(c) of the Planning Development Act (as amended) requires that the future RSES ‘is consistent with the

transport strategy of the NTA'. DTS (20 years) is at a different timescale to the RSES (12 years) and is closer to the envisaged NPF time horizon. While the DTS would be a consideration for NPF and particularly the RSES, it is considered that this section would benefit from a statement reflecting this future review mechanism whereby consistency can be maintained between national and regional scale plans over the long term.

- Section 5.8.2 states (pg.75) that it is intended that '*confirmation of consistency with the Strategy is obtained from the Authority in advance of a road authority seeking development consent for a particular road scheme*'. Such a requirement does not have a legislative basis and the statement may create unnecessary ambiguity in requirements for roads proposals.
- Planning authorities are required to ensure that their development plan is consistent with the transport strategy of the DTA under section 9(6A) of the Planning & Development Act (as amended) and the development plan will be a material consideration in any planning approval for roads development by a local authority or An Bord Pleanála. It is therefore recommended that this requirement is omitted from the strategy.
- Section 5.10 states that it is intended to develop a P&R facility at Greystones (pg.78). However, Figure 5.11 on pg.79 identifies P&R facility at Bray. Please clarify.
- Section 7.1.2 *Strategic Planning Principles* includes (p.89) that '*Except in Limited Circumstances*' developments requiring significant trips should not occur in locations poorly served by public transport. The Department would like clarification on this caveat of what may constitute the specific '*limited circumstances*' where such development may proceed.
- Similarly, section 7.1.2 also states that '*In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied*'. The Department advises it would benefit from clarifying the potential planning mechanisms for doing so to ensure equitable enforcement of this approach.

Commentary / Response:

In relation to the integration between the transport strategy and land use policy, this is set out in Chapter 7 which defines the relationship between the strategy and the Regional Spatial and Economic Strategy to be developed by the Eastern and Midland Regional Assembly. Coupled with the clear interacting provisions set out in the relevant legislation, it is considered that the relationship between the two areas is clearly established.

Because it is not feasible to set out an exhaustive list of local road schemes than may be undertaken over the next twenty years, an approach of setting out "Principles of Road Development " has been adopted in the draft transport strategy. Given that approach, it is considered that a mechanism confirming consistency with the adopted Strategy in advance of any development consent process would be assistive to the scheme developers in avoiding potential later issues. It is noted that the local authority development plans will be required to be aligned with the transport strategy in any event. The wording of section 5.8.2 has been amended to state: "*[i]t is recommended that confirmation of consistency with the Strategy is obtained from the Authority in advance of a road authority seeking development consent for a particular road scheme. Exchequer grants should only be provided for road schemes which are in accordance with the principles set out in section 5.8.3.*"

In relation to a park and ride site at Bray, what is set out in section 5.10 is a potential park and ride facility to be provided at a proposed new DART station at Woodbrook, north of Bray.

Section 7.1.2 Strategic Planning Principles includes the principle that “Except in limited circumstances developments requiring significant trips should not occur in locations poorly served by public transport.” An example of such a “limited circumstance” would be a development of national economic importance. It is considered that the relevant local authority will be best placed to determine the limited circumstances which might be applied in a particular location.

Except in limited circumstances, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high capacity public transport.

Regarding the proposed recommendation that parking caps might be considered in particular areas, there are various mechanisms and models for achieving this. Rather than set out such mechanisms in a strategy document, it is proposed that a guidance note on parking provision will be prepared separately.

Submission No. 102

Name: Joanne Grant

Organisation: JCDecaux Ireland

Summary of Submission Comments, Issues and Recommendations:

- Seeks a legislative amendment to allow bike distribution vehicles to use bus lanes, bus gates and bus only turn locations; and
- Proposes that “the city needs to develop around transport hubs which provide shelter and other quality services in terms of connectivity, wi-fi, accommodation, refreshments, public washroom facilities”.

Commentary / Response:

In relation to the use of bus lanes by bike distribution vehicles, bus lanes have been provided, both here and internationally, to ensure that bus-based public transport can operate reliably and at a reasonable speed, and to minimise bus delays due to traffic congestion. As bus transport is the dominant mode of public transport in the Dublin area and in the other cities across Ireland, their continued successful performance of this role is essential for the efficiency of the overall transport system.

Since the introduction of the bus lane network, there have been numerous requests to open bus lanes to other classes of road user. These have included requests relating to motorcycles, hackneys, multi-occupancy cars and bike distribution vehicles. The issue of access for limousines has also been raised from time to time over the years.

Each request, if granted, would represent an incremental addition to bus lane usage and while it might be the case that a single addition would not undermine the overall effectiveness of the bus lane system for bus-based passenger movement, the cumulative impact would be significant and detrimental. In addition, while in some cases the numbers of vehicles involved might not be large, conceding access to bus lanes to a new class of vehicles would make it difficult to argue against doing so for other vehicle classes.

It is, therefore, the case that extending the use of bus lanes to other categories of vehicle would undermine the original purpose of, and the substantial investment in, the bus lane network. Increased access by other vehicle categories would erode the carrying capacity of these bus lanes and potentially undermine their primary role of providing bus priority in congested urban areas.

In respect on higher quality on-street facilities at key transport hubs, this is recognised and acknowledged in Section 6.6 “Optimising Interchange and transport facilities” of the draft transport strategy, which commits to “[p]rovide secure and comfortable waiting facilities for passengers, with shelters and seating within a well-lit environment, and support facilities such as toilets and refreshments where deemed necessary”.

Submission No. 103

Name: Jim Cleary

Organisation: Fingal County Council

Summary of Submission Comments, Issues and Recommendations:

This submission is broadly supportive of the proposals set out in the draft transport strategy. It sets out a number of items that it would like greater clarity and detail on, and comments and recommendations for consideration as follows:

- Additional orbital and regional bus links to Dublin Airport;
- An orbital bus corridor using bus lanes near IKEA;
- Implementation of the M50 Demand Management Study; and
- Provision of a BRT service to Swords/Airport in advance on new Metro North.

Commentary / Response:

On the clarification items, while movements from Tyrellstown could connect to the proposed BRT at Blanchardstown, it is considered appropriate, given the increasing scale of development along this corridor, to provide a Core Radial Bus Corridor to more directly serve Tyrellstown and surrounding areas.

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the level of closures of the road crossing will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at the various locations following the closure of the level crossings.

Four tracking of the Northern Rail Line is not included in the draft transport strategy.

In relation to the specific identification of regional and local road schemes in the draft transport strategy, the approach that has been adopted is not to produce an exhaustive list, which runs the risk of omitting schemes that may become identified in the future, but instead to establish principles in relation to such provision.

The submission notes the statement in section 4.3 in relation to *“increasing car parking levels at destinations such as shops and schools”*. This was one of the option elements considered – it is not a recommendation of the draft transport strategy.

Section 6 of the draft transport strategy does commit to an increased level of bus services, which will, undoubtedly, include services to Dublin Airport.

In relation to additional orbital bus services on routes other than the Core Orbital Bus Network, this is facilitated by the draft transport strategy. Section 5.5 states: *“This core network represents the most important bus routes in the region, and are generally characterised by a high frequency of bus services, high passenger volumes and with significant trip attractors located along the route. The identified core network comprises sixteen radial bus corridors, three orbital bus corridors and six regional bus corridors. While this network represents the core high frequency bus routes, it is supplemented by other bus services operating on lower frequency routes and by local buses running on other routes.”*

The introduction of demand management measures on the M50 is included in sections 5.8.4 and 5.9 of the draft transport strategy.

In relation to the provision of a BRT service to the Airport and Swords, the draft transport strategy states at section 5.5.4:

“In addition, on the Swords/Airport to City Centre corridor, it will be necessary to provide a higher level of public transport capacity than the existing provision, both in advance of new Metro North and also to serve areas south of the M50 subsequent to the implementation of new Metro North. This additional capacity will take the form of a BRT service or a BRT type service or a conventional bus corridor upgrade along this route or parts of this route. The exact arrangements to be implemented will be determined in conjunction with the development arrangements for new Metro North, and will be designed to be complementary to the new Metro North proposal. Accordingly, a BRT scheme is included for development along the Swords / Airport to City Centre corridor, but its extent may be reduced or it may be modified to a conventional bus corridor upgrade, in conjunction with the development of the new Metro North project.”

Submission No. 104

Name: Robert Doyle

Organisation: Department of Arts, Heritage and the Gaeltacht

Summary of Submission Comments, Issues and Recommendations:

Strategy

- Section 8.2 of the Strategy refers to chapter 7 and appendix B of the SEA but appendix B appears to be missing from the SEA.

NIS

- The GDA Cycle Network Plan has been incorporated and it is stated in section 2.3.2 that the Plan has already been subject to appropriate assessment. The Dept.’s opinion is that it needs to be assessed in combination as there may be cumulative effects e.g. proposed cycleways & walkways across and around Malahide & Rogerstown Estuaries which will cumulatively impact with the electrification proposed.

- Section 3.2.1.2 states that the significance of disturbance on Natura 2000 sites will be assessed by lower level AA under the relevant scheme. Also, stated in section 3.2.1.4 is the significance of the collision risk from the electrification of the rail structure. The Dept.'s view is that this needs to be assessed for this Strategy as pushing it down to project level will not adequately address the impacts of the whole strategy.
- With regard to site-specific conservation objectives including attributes and targets, section 3.3 states that these will be more useful at project level AA. There has been no real discussion of how attributes and targets might be impacted by the Strategy. The Dept.'s view is that these issues need to be assessed at Strategy level not at project level.
- Table 4.1 details mitigation measures for Natura 2000 sites. It is noted that one mitigation proposal is that "Where Integrated Management Plans are being prepared for European sites (or parts thereof), the NTA shall engage with the National Parks and Wildlife Service in order to ensure that plans are fully integrated with the Strategy and other plans and programmes, with the intention that such plans are practical, achievable and sustainable and have regard to all relevant ecological, cultural, social and economic consideration". In the absence of such plans the use of attributes and targets in site-specific conservation objectives will in themselves determine site management to a large extent e.g. the site specific conservation objectives for Malahide Estuary SAC. Where site-specific conservation objectives are not available, an examination of the attributes used to define site-specific conservation objectives for the same QIs in other sites can be usefully used. Same mitigation is also in Table 9.1 of the SEA.
- Table 2-6 lists the Natura 2000 sites that were screened within a 15 km radius. The GDA Cycle Network Plan is part of a National plan, the screening would need to take the Dublin to Galway proposed cycle route into account.
- The EC (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) and 2013 (SI 499 of 2013) should be added to table 2.1.
- In table 2.1 the Wildlife Acts can be quoted collectively as the Wildlife Acts 1976-2010 which incorporates all the amendments.
- Table 2-7 lists plans and programmes that could give rise to cumulative effects. It is unclear why projects have not been included. Additional plans that should be included are the County Heritage Plans, County Biodiversity Action Plans and the Waterways Ireland draft Heritage Plan.
- It is recommended by the Depart that the NIS is amended to ensure that a more robust assessment is carried out.

SEA

- Table 5.1 lists the SEO's with targets and indicators. There are 3 SEOs for Biodiversity, Flora & Fauna. Some confusion between the SEOs and their indicators and targets e.g. B1 relates to Natura 2000 sites yet the target includes nationally protected species which differs from species protected under the Birds and Habitats Directives. This may need to be amended. Table 10.1 also needs to be amended. Terms such as "relevant habitats" & "listed species" etc. used in table 10.1 need explanations.
- Tables in Section 8.6 show interactions with SEOs of the provisions of the Strategy. Need to clarify how B1-B3 appear in both green and orange in many instances.
- Table 8.6.1 deals with interactions of heavy rail infrastructure. As discussed under "NIS" above the Dept. has concerns re the cumulative impacts of the GDA Cycle Network Plan and this strategy on biodiversity, particularly Malahide & Rogerstown Estuaries Natura 2000 sites. Also,

the Dept. has concerns regarding otters and bats through impacts on ecological corridors as envisaged under Article 10 of the Habitats Directive and on species listed on annex IV of the Habitats Directive. These issues have not been adequately addressed.

- Comments made under the heading of “NIS” also apply to table 9-1 of the SEA.
- It is acknowledged on pg 85 of table 9.1 that site specific field data may be required to identify the most appropriate corridors. It will be important that the NTA ensure a route is ecologically feasible before continuing further to detailed design.
- On page 85 of table 9.1 Appendix B is referred to, but it does not appear to be present.
- The EC (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) & 2013 (SI 499 of 2013) should be added to table 9.1 on page 88 & to page 104 of Appendix I. The Wildlife Acts 1976-2010 incorporate all the amendments. The National Biodiversity Plan is mentioned twice in appendix I, pg 104 & 108 but with different explanatory text.
- Heritage Plans in appendix I, presumed these refer to County Heritage Plans please include Waterways Ireland draft Heritage Plan.

Commentary / Response:

Comments on SEA and AA to be dealt with separately

Submission No. 105

Name: Professor Andrew J Deeks

Organisation: President, UCD

Summary of Submission Comments, Issues and Recommendations:

This submission is supportive of the proposals set out in the draft transport strategy and encourages the bringing forward transport projects to meet the needs of the University. Some of the items of particular focus to the University are:

- The development of orbital bus connections from areas such as Dundrum, Tallaght, Rathfarnham, Templeogue and Kimmage;
- The provision of a publicly subvented bus service between UCD and Sydney Parade DART station;
- The development of the Blanchardstown to UCD BRT scheme;
- The implementation of the Greater Dublin Area Cycle Network Plan; and
- Clarity on the Eastern Bypass corridor.

Commentary / Response:

The development of the Core Bus Network includes the development of an orbital bus corridor, option C2a in the “Dublin Orbital Movement Study Options Report” (one of the technical reports underpinning the draft transport strategy), linking Tallaght to UCD via Dundrum. Together with other improvements

to bus networks and bus frequencies, a much improved bus service will be available through the draft transport strategy measures.

The issue of whether or not to provide a subvented bus service between UCD and Sydney Parade DART station falls to be dealt with outside of the transport strategy. In general, feeder services to rail stations are most successful when they serve a large destination as part of the route service, and clearly UCD constitutes an extremely large destination.

Both the Blanchardstown to UCD BRT scheme and the full network set out in the Greater Dublin Area Cycle Network Plan will be developed during the period of the strategy.

In relation to the Eastern Bypass, the draft transport strategy states in section 5.8.1 *“[s]imilarly, in the case of the Eastern Bypass, while the section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in this Strategy, the remainder of the route is not proposed for development during the Strategy period. However, the retention of a route corridor for this scheme is recommended, to facilitate the possible future use of the corridor for transport provision.”*

Submission No. 106

Name: Gerard Dornan

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- The function of local authority cycling officers should be defined.

Commentary / Response:

The definition of the role of local authority cycling officers is outside the ambit of a regional transport strategy.

Submission No. 107

Name: Gerard Farrell

Organisation: DublinTown

Summary of Submission Comments, Issues and Recommendations:

- Supportive of the development of sustainable and public transport and of key public transport infrastructure projects;
- There is a need to accelerate transport investment in Dublin; and advocates private sector finance involvement in delivering key infrastructure;
- Important to maintain access to car parks and hotels in Dublin City Centre;

- Proposes levy on employee car parking spaces;
- Delivery systems in Dublin need further development;
- Additional cycle parking is required;
- Need to invest in better quality street lighting as part of the pedestrian environment; and
- Fares need to be made affordable and attractive.

Commentary / Response:

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans. The involvement of private financing will be considered on a case by case basis.

The importance of retail activity to the vitality and economic well-being of Dublin City Centre is fully acknowledged. While the draft transport strategy is a regional transport strategy, it aligns and facilitates the various proposals that have been separately published, jointly with Dublin City Council, in the Dublin City Centre Transport Study. Following on from a separate consultation in relation to that transport study, extensive engagement is on-going in relation to car park access for retail and hospitality purposes in the City Centre. The objective of that engagement is to ensure an adequate and acceptable level of access to car parks for such activity.

Section 5.9 of the draft transport strategy states that it is intended to: *“[r]educe the availability of workplace parking in urban centres to discourage car commuting, where alternative transport options are available.”* The implementation of an employee car park levy would require legislation which is outside the ambit of the transport strategy.

The draft transport strategy recognises the need to reconfigure delivery arrangements in Dublin City Centre. It states in section 5.8.4 that it is intended to:

- *“Seek the introduction of specific delivery arrangements in large urban centres, including Dublin City Centre, which targets deliveries outside of peak commuting hours and, preferably, outside of daytime business hours; and*
- *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.”*

The draft transport strategy also proposes additional cycle parking provision in section 5.6. Also street lighting improvements will be an integral part of pedestrian improvement schemes.

In relation to fares the proposals include the implementation of a *“simplified fare system will be introduced in the Greater Dublin Area, covering bus, rail, Luas and Metro services, which will also facilitate multi-leg and multi-modal journeys in a cost effective manner”*.

Submission No. 108

Name: Ken Swaby, ILTP

Organisation: On behalf of Paypal and the National Sports Campus Development Authority

Summary of Submission Comments, Issues and Recommendations:

- Considers that the Blanchardstown to UCD BRT route is not the optimal BRT route and considers that an alternative developed by ILTP serving north Blanchardstown is a better alternative;
- Supports the N3 road upgrade; and
- Concerned that the draft transport strategy does not fully recognise the importance of the North Blanchardstown area.

Commentary / Response:

The Blanchardstown to UCD BRT route has been subject to extensive analysis as part of its development. In due course a full route options report will be put forward at the project level for public consultation.

The importance of North Blanchardstown was fully recognised in the development of the draft transport strategy. The relevant population and employment projections are aligned with the proposed land use intentions.

Submission No. 109

Name: Ben Waite, ILTP

Organisation: On behalf of Chartered Land and the ILAC Centre

Summary of Submission Comments, Issues and Recommendations:

- Strategy should place more emphasis to the Government's recently published "Infrastructure and Capital Investment 2016 – 2021" document;
- The draft transport strategy should take more account of emerging technologies such as "Uber" to increase car occupancy levels; and
- The draft transport strategy should take more account of alternative fuels;

Commentary / Response:

The Government's recently published "Infrastructure and Capital Investment 2016 – 2021" document has been fully taken account of in the development of the draft transport strategy.

Nothing in the draft transport strategy precludes the use of technology where appropriate. It should be noted that the document, in section 5.9, commits to:

"Support and facilitate the implementation and expansion of:

-
- *Car club schemes and car sharing".*

In relation to alternative fuels, the objective of the draft transport strategy is "[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods." This objective focusses on "efficient" and "sustainable" movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

In relation to Intelligent Transport Systems, section 6.11 confirms that it is intended to: “[u]tilise Intelligent Transport Systems for the provision of information and services to road users of all types.”

Submission No. 110

Name: Cllr. Pdraig McEvoy

Organisation: Member of Kildare County Council

Summary of Submission Comments, Issues and Recommendations:

- Concerned in relation to the issue of carbon emissions; and
- Wishes to see additional advocacy in the area of cycling policy.

Commentary / Response:

The objective of the draft transport strategy is “[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.” This objective focusses on “efficient” and “sustainable” movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

A new section 8.5 will be added to the draft transport strategy to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

In relation to the proposal for a designated Cycling Officer in each local authority, this is an issue which can be addressed outside of the transport strategy.

Submission No. 111

Name: Eddie Taaffe

Organisation: South Dublin County Council (Director of Services, Land Use Planning & Transportation)

Summary of Submission Comments, Issues and Recommendations

- Strategy generally aligns with SDCCs commitment re. County Devt Plan, to the provision of sustainable transportation and economic growth –essential that Strategy is implemented over the next 20 years to accommodate projected growth;
- Re. Heavy Rail, Transport Strategy should commit to the opening of Kishogue Station, with the early phases of the Clonburris SDZ planning scheme;
- Re. Lucan Luas, it is vital that the shortest route between Lucan and the City Centre is applied to minimise journey time. SDCC would like to see the potential to extend the line to service Adamstown, formally acknowledged in the Strategy and investigated further as the route is finalised;
- Re. Core Radial Bus Network, this is welcomed by SDCC. However, routes to Tallaght could be extended west to Jobstown area; route to Clondalkin could be extended to Grangecastle; N7 route could be extended to Saggart and Rathcoole; Whole of catchment approach to accessibility should be undertaken, provision of new cycle and ped. links, in particular could be linked to the delivery of these services;
- Re. Core Orbital Bus Network, SDCC welcome its inclusion in Draft Strategy - again, reference to the whole catchment approach, as outlined above. However, Development Plan-proposed Citiwest to Lucan corridor has not been included in Strategy – analysis would suggest strong demand – could be extended further north to connect with Hansfield;
- Re. Hubs and Interchanges, it is recommended that these are specified in the Strategy and would assist in identifying connectivity of the network and provide a more complete picture of the Strategy – their identification would highlight the need for more detailed movement studies at key locations such as Tallaght, Clondalkin, Clonburris, Liffey Valley and Rathfarnham;
- Re. Walking Cycling, would like to see further emphasis on increasing accessibility to p.t. for ped and cycle modes, supported by a whole catchment approach and closely linked to permeability projects;
- Re. behavioural change initiatives, a greater emphasis on the STMG would be welcomed in the Strategy;
- Re. Bike Share Scheme, a review of the scheme is suggested within the County's major towns, starting in Tallaght T.C.;
- Re. Special Speed Limits, recommended greater support mechanisms to support this, as part of the whole-catchment solution;
- Re. Roads:
 - Focus on the construction of new roads being limited to new development areas and emerging communities and to support economic development/ movement of goods
 - Recommended that orbital route outside of M50 is illustrated in the Strategy to provide greater certainty
 - Concerns expressed re. multipoint tolling – it should be delivered in tandem with Core Orbital Bus Network; introduction could reroute traffic onto local SDCC road network to

- avoid tolls – this needs to be taken into account and the tolling scheme applied in a manner which discourages such actions;
- Concern expressed regarding the use of the term ‘express road’ (ref. s.5.8.3 of Draft Strategy) and their exclusion from need to provide safe and appropriate arrangements for non-car modes – such roads would rarely be appropriate for urban areas. Concern expressed that this term could be misconstrued and applied to local and regional road schemes – recommend use of the term ‘relief roads’ (ref. s.3.4.4 of Design Manual);
- Re. Park and Ride: Support provision at Liffey Valley, however, recommendation that Adamstown, Kishogue and Fonthill stations are also acknowledged in the Strategy – ref. faster and direct interchange with rail services to City Centre; and
- Re. Car Parking: a more comprehensive and binding guidance for the imposition of maximum parking standards is recommended, to create greater consistency across the GDA, than those presented in ‘Achieving Effective Workplace Travel Plans’ NTA guidance.

Commentary / Response

Kishogue Station will be opened. The exact timing of the opening will be dependent on the availability of funding to complete the ancillary works to the station and likely passenger usage.

The Luas to Lucan project will be required to go through a full route options analysis, which will consider the previously proposed route as well as other viable alignments. Assessment of the Lucan Corridor does indicate that light rail level capacity is required to address the future demands of the corridor.

Section 5.5 of the Draft Strategy states: *“While this network represents the core high frequency bus routes, it is supplemented by other bus services operating on lower frequency routes and by local buses running on other routes”*. In the case of the suggested extensions of the Tallaght and Clondalkin routes, the Draft Strategy currently provides for the meeting of this demand through the use of complementary, lower frequency routes. However, further extensions to the said core routes would not be precluded in the future, if sufficient demand arises. The ‘whole of catchment’ approach is supported and reflected in Chapter 7 of the Draft Strategy.

In relation to additional orbital bus services on routes other than the Core Orbital Bus Network, this is facilitated by the draft transport strategy. As stated in Section 5.5, while Core Bus network represents the core high frequency bus routes, it is supplemented by other bus services operating on lower frequency routes and by local buses running on other routes. However, further extensions to the said core routes would not be precluded in the future, if sufficient demand arises.

The suggestion in regard to hubs and interchanges is noted - the Draft Strategy does not specify the key locations mentioned as hubs or interchanges. However, the various interconnecting networks defined in the Draft Strategy do create multiple opportunities for interchange and this is supported by the objectives set out in section 6.6 of the draft strategy, which would be applicable to those locations referenced.

Maximising walking and cycling accessibility to public transport nodes and other destinations is central to the Strategy’s objectives, as reflected in Chapter 7, section 7.1.2. This complements SDCC’s proposed ‘whole corridor’ approach.

The implementation of the various sustainable transport infrastructural elements will be set out in an Implementation Plan, following an adoption of the Strategy by the Minister for Transport. The funding mechanisms will be determined by the Minister and may include a continuation of the current grant programme.

The draft transport strategy states in section 5.6: *“To complement the investment in the cycle network, it is intended to ... Seek the expansion of the bike share scheme in Dublin City (dublinbikes) and the introduction of similar schemes in other appropriate centres across the GDA”*.

The draft transport strategy supports the application of lower speed limits, including 30 km/hr zone on urban roads, as a means of achieving more effective traffic management and greater safety for vulnerable road users. Regarding lower speed limits, section 5.7 of the draft transport strategy does provide for this measure. An amendment will be made to include “urban centres” in the lower speed proposals.

Section 5.8.3 of the draft transport strategy set out a series of principles governing the development of additional roads. In relation to the Outer Ring Road / Ballyowen Road, investment is not precluded in bus services as set out in the Development Plan, if such investment were financially viable and consistent with other Strategy objectives.

Regarding the Leinster Orbital Route, the draft transport strategy (Section 5.8.1) states *“[w]hile this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”*

While the concerns regarding the interaction of demand management on the M50 with additional bus provision are acknowledged, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively. .

In regards to ‘express roads’, the function of these would be to cater for strategic movement within, to and from the GDA. As such, it is not intended that such routes would cater for local movement within urban areas by modes such as walking and cycling.

Park and ride provision is dealt with in section 5.10 of the draft transport strategy. In addition to the strategic park and ride sites specified, it is stated the strategy will further develop the provision of local park and ride facilities in the outer parts of the Metropolitan Area.

In relation to the provision of more detailed guidance on parking standards, it is considered that this would be best addressed outside of the transport strategy.

Actions:

In section 5.7, replace “In conjunction with local authorities and An Garda Síochana, evaluate, and where appropriate seek the introduction of, lower speed limits on residential streets;” with “In conjunction with local authorities and An Garda Síochana, evaluate, and where appropriate seek the introduction of, lower speed limits on residential streets and in urban centres;”

Submission No. 112

Name: Noel Matthews

Organisation: Matthews Coach Hire Limited

Summary of Submission Comments, Issues and Recommendations

- Re. Study Area - Concern that corridor analysis, with ref. to Corridor A, ends at the GDA boundary. Drawing artificial lines undermines the development of an appropriate transport policy for the GDA, which should include all areas from which a significant number of people commute to Dublin on regular basis – a broader geographic area.
- Re. BRT – business case has not been adequately established; questioning inclusion of BRT routes in existing Implementation Plan, despite apparent lack of a published business case; view expressed that capacity increase could be achieved with a much smaller investment; development of BRT is premature in the absence of full implementation of required (network) measures, including bus corridors, priority at junctions, etc. ; inadequate consideration of private bus and coach sector in BRT study.
- Re. Coach Parking proposal for Dublin City Centre – supported, however, reference to ‘coach parking facilities’ in the Strategy is minimal and effectively ignores the role of private bus operators; any removal of existing layover facilities in the City Centre can be progress until there is greater certainty on the delivery of alternative.
- Re. access by private operators to facilities currently limited to Dublin Bus and Bus Eireann, no mention in Strategy of implementing Section 62 of DTA Act – issue of commencement of Section 62 must be addressed – Study cannot be taken seriously in the absence of address this, which goes to core of integration, network planning, connectivity and interchange.
- Re. reference to Private Bus Sector – not a single specific mention of its role in the draft strategy.
- Ref. Corridor A demand – significant capacity issues will arise re. M1 – extend 3 lane capacity beyond junction 4 and dedicated p.t. lane during peak times by using redesignated hard shoulder (as per. Belfast),
- Ref. other junction capacity issues - capacity constraint at Malahide Road junction, at end of M1 (R132) and at R139 Clare Hall junction – needs to be addressed so as to enable more efficient movement of buses along this corridor, into the City.

Commentary / Response

The supporting analysis undertaken using the Greater Dublin Area multi-modal transport models, does take into consideration travel demand from origins and to destinations outside of the Greater Dublin Area. This has been reflected in the analysis of each specific corridor and as such, in the Draft Strategy's recommendations.

As part of the Strategy, it is intended to develop a number of BRT schemes along routes forming part of the Core Bus Network. The capacity, alignment, design specification and sequencing of these schemes

has yet to be determined and will be informed primarily by the Strategy objectives pertaining to the Core Bus Network as a whole and the sequencing of other elements of the integrated public transport networks across bus and rail modes.

Coach set down and layover facilities will be provided for on an on-going basis for all licenced bus / coach operators, whether they are private or semi-state operated. The location of such facilities will be determined and as appropriate, changed over time, in response to the changing needs of the coach/ bus sector and will be informed by the provision of a dedicated coach parking facility as proposed.

Facilities for the operation of bus services, proposed in the Draft Strategy, do not preclude, in any instance, their use by private or semi-state bus/ coach operators.

Whilst specific reference has not been made to private bus/ coach operators, none of the proposals relating to bus and coach services, preclude the inclusion of either private or semi-state operators.

Base year and future year demand has been assessed in the preparation of the Draft Strategy, using the GDA multi-modal models, for the GDA as a whole and for the specific corridors within which certain interventions are proposed. In regards to Corridor A, the specific interventions required to deliver sufficient capacity to meet forecast demand will be addressed in an integrated manner across all modes when the relevant schemes are being progressed.

Submission No. 113

Name: Cllr. Irene Winters & William Winters

Organisation: Member of Wicklow County Council (Cllr. Irene Winters)

Summary of Submission Comments, Issues and Recommendations:

- Proposes an addition to the heavy rail section of the strategy to state: *“Ensure an appropriate level of investment to protect existing rail infrastructure from coastal erosion, in particular from Greystones to Wicklow Town”*.

Commentary / Response:

The concerns raised in this submission with regard to the physical projection of the rail line between Bray and Greystones are noted. The third bullet point in section 5.2.8 will be amended to read “Additional works to maintain the operational efficiency of the train network and additional works to enhance service provision”.

Action: *Replace the third bullet point in section 5.2.8 to read “Additional works to maintain the operational efficiency of the railway network and additional works to enhance service provision”.*

Submission No. 114

Name: Frances Fitzgerald

Organisation: TD Dublin Mid West

Summary of Submission Comments, Issues and Recommendations:

- Lack of connections to existing public transport services;
- Poor walking environment in vicinity of Public Transport;
- Proposes a feeder bus service to Luas Red Line from Clondalkin;
- Lack of orbital linkages between Dublin Mid West Towns – Clondalkin, Lucan, Palmerstown, Rathcoole, Newcastle, Saggart and Brittas;
- Open Kishogue Station;
- There should be a rail station at Fonthill Road /Clondalkin;
- Need greater capacity on the 25 bus route into city centre from Lucan;
- Lucan Luas journey times will be too slow; and
- Requirement for local services in West Dublin to link social facilities.

Commentary / Response:

Ensuring safe and convenient connection to public transport services is a necessary component of increasing the attractiveness of public transport. An additional bullet point will be added to the list of bullet points in Section 5.7 to state: “Support pedestrian permeability provision in new developments, and the maintenance, plus enhancement where appropriate, of such arrangements in existing developments.”

In terms of walking environment, section 5.7 of the draft transport strategy sets out the objectives for improving footpath provision.

The issue of a feeder bus service to the Luas Red Cow stop is something that can be addressed outside the ambit of a regional transport strategy.

The draft transport strategy does provide for enhanced orbital bus movement and proposes corridors for bus priority development. This enhanced orbital movement does include linkages between Lucan, Clondalkin and Tallaght.

The draft transport strategy includes (section 5.8.2) a specific commitment to “*enhance orbital movement, outside of the M50 C-Ring, between the N3, the N4 and N7 national roads, by the widening of existing roads and the development of new road links*”.

Kishogue Station will be opened. The exact timing of the opening will be dependent on the availability of funding to complete the ancillary works to the station and likely passenger usage. Other stations will be developed as part of the DART Expansion Programme.

The draft transport strategy includes (section 5.8.1) for enhancements to the N4 national road, which will include upgrade works at Quarryvale Junction.

The Luas to Lucan project will be required to go through a full route options analysis, which will consider the previously proposed route as well as other viable alignments.

The provision of additional buses on specific routes is outside the ambit of a regional transport strategy and can be addressed separately.

Action: Add additional bullet point to the list of bullet points in Section 5.7 stating: “Support pedestrian permeability provision in new developments, and the maintenance, plus enhancement where appropriate, of such arrangements in existing developments.”

Submission No. 115

Name: George Mongey

Organisation: N/A

Summary of Submission Comments, Issues and Recommendations:

- Projects need to be fast-tracked;
- There is an imbalance between north and south Dublin in project allocation;
- There is no orbital route planned for Metro or Luas;
- Taxi should be restricted in bus lanes on grounds of road safety;
- M50 Demand Management would cause chaos; and
- More resources for Traffic Management to solve major bottlenecks.

Commentary / Response:

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

The transport proposals set out in the strategy have been developed to tackle the transport demand requirements for the Greater Dublin Area, with detailed corridor studies carried out. It is therefore considered that projects sufficient to meet the future travel needs of both north and south Dublin are included.

Based on the anticipated levels of travel demand, the draft transport strategy does provide for enhanced orbital bus movement and proposes corridors for bus priority development. This enhanced orbital movement does include linkages between Lucan, Clondalkin and Tallaght.

It is not anticipated that taxis would be excluded in general from bus lanes across the Greater Dublin Area, as they are considered an essential element of the public transport system.

While the concerns regarding demand management on the M50 are acknowledged, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively.

It is accepted that more resources need to be put into traffic management. Under section 64 of the Dublin Transport Authority Act 2008, the Authority is required to prepare, adopt and implement a

strategic traffic management plan for the GDA. This will be required to address the region's needs in relation to traffic management.

Submission No. 116

Name: Cllr. Sean Drew

Organisation: Meath County Councillor

Summary of Submission Comments, Issues and Recommendations:

- Reduce number of toll points on the M3;
- Additional Park and Ride provision on the 109 route, particularly at Cavan and Kells;
- Improve rural bus services in North Meath;
- The 108 bus route should be amended; and
- A rail link should be provided to Navan.

Commentary / Response:

The tolling scheme on the M3 is subject to an existing contract arrangement, and any potential contractual changes are outside the scope of the draft transport strategy.

Park and ride provision is dealt with in section 5.10 of the draft transport strategy. However, to function effectively, a strategic park and ride site requires a high frequency public transport linkage to the destination locations. Locations such as Cavan and Kells do not have a sufficiently high frequency of service to justify a strategic park and ride site. However, they do require adequate car park facilities for all regular bus users accessing the services by car.

The draft transport strategy sets out objectives for local transport services in section 6.9.

Issues associated with specific bus routes are outside the ambit of a regional transport strategy and can be addressed separately.

The importance of Navan as the county town of Meath and its designation as a "Large Growth Town I" in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only "Large Growth Town I" designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within

six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

Action: Insert at the end of section 5.2.8 the following text:

“The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.”

Submission No. 117

Name: Malachy Bradley

Organisation: Eastern and Midlands Regional Assembly

Summary of Submission Comments, Issues and Recommendations:

- Cycling should be promoted and should be formal recognition of cycling officers in local authorities, segregated cycle lanes and better secure cycle parking in city centre;
- Concern over knock on implications on the local road network if Demand Management measures are introduced on the M50;
- Park & Ride facilities should be of a sufficient scale to meet demand;
- Travel plans for schools encouraged;
- Lack of provision for ‘east-west-east’ movement through Dublin;
- Clarity on status of Eastern Bypass sought;
- Little evidence in SEA on impacts upon Human Health – more consideration should be given to climate change;
- Low emission vehicles should be proposed for public transport;
- Economic aspects should be considered – car access required to city centre;
- Employment should not just be in Dublin City Centre – should also be in other locations;
- Provision should be made for connectivity to Navan and Dunboyne areas; and
- Incident management on the M50.

Commentary / Response:

The draft strategy places a strong emphasis on the development of walking and cycling infrastructure, including in Section 5.6 *“it is intended that many of the key cycling routes will be developed as segregated facilities, with cyclists separated from vehicular traffic through the use of kerb separators or by having the cycleway at a higher level than the road carriageway.”*

While the concerns regarding demand management on the M50 are acknowledged, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively. The M50 is a national route and as such it is critical that its core function remains the movement of strategic traffic. It is anticipated that with the roll out of the transport strategy more

local trips will be facilitated using modes other than the private car, which will ameliorate the concerns over the knock on implications on the local road network as car levels are reduced on the M50.

The construction of DART underground as well as Lucan Luas, BRT and revision to the existing bus network, including the introduction of orbital bus services will better facilitate east-west-east movement.

In relation to the Eastern Bypass, the draft transport strategy states in section 5.8.1 *“[s]imilarly, in the case of the Eastern Bypass, while the section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in this Strategy, the remainder of the route is not proposed for development during the Strategy period. However, the retention of a route corridor for this scheme is recommended, to facilitate the possible future use of the corridor for transport provision.”*

In relation to a rail link to Navan, the importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

The objective of the draft transport strategy is “[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.” This objective focusses on “efficient” and “sustainable” movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

A new section 8.5 will be added to the draft transport strategy to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

The importance of retail activity to the vitality and economic well-being of Dublin City Centre is fully acknowledged. While the draft transport strategy is a regional transport strategy, it aligns and facilitates the various proposals that have been separately published, jointly with Dublin City Council, in the Dublin City Centre Transport Study. Following on from a separate consultation in relation to that transport study, extensive engagement is on-going in relation to car park access for retail purposes in the City Centre. The objective of that engagement is to ensure an adequate and acceptable level of access to car parks for retail activity.

The draft transport strategy reflects the employment patterns set out in the Regional Planning Guidelines and the various local authority developments, which is much more regionally spread than just focussed in the City Centre.

Incident management is an operational which can be addressed outside of a regional strategy.

Action: Insert at the end of section 5.2.8 the following text:

“The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.”

Action: Insert a new Section 8.5 into the draft transport strategy stating the following:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Submission No. 118

Name: Bernard Allen

Organisation: N/A

Summary of Submission Comments, Issues and Recommendations:

- Strategy not ambitious enough;

- Enhanced bus service to Navan will not meet demand in 2035, and population projections are excessively conservative and a rail link to Navan is required;
- Use of the Navan – Drogheda line to connect to Dublin for commuters proposed;
- Incentives for road users to use M3 Parkway proposed;
- Need a passing loop in Dun Laoghaire area to facilitate commuter services from south to pass DART services; and
- There should be a heavy rail link to the Airport.

Commentary / Response:

The draft transport strategy has carried out a detailed study of demand for travel across the GDA including specific 'Corridor Studies'. This analysis has identified that the most appropriate way to meet the anticipated travel demand from Navan is with an enhanced bus service. On the issue of reopening the rail line between Drogheda and Navan, a similar position of insufficient passenger demand to justify a heavy rail service applies here also. However, additional text is being added to the end of section 5.2.8 stating:

"The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available."

Park and ride provision is dealt with in section 5.10 of the draft transport strategy.

The draft transport strategy provides for improvements in bus and train services (Chapter 6). Specifically, section 6.3 states "[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones". The achievement of higher speeds on the DART system between Dun Laoghaire and Sandycove is something that can be examined as part of the operational arrangements for the DART service.

The issue of a rail connection to Dublin Airport was dealt with in the the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

Submission No. 119

Name: **Tiago Oliveira**

Organisation: **ARUP on behalf of Himes Ireland (Cherrywood)**

Summary of Submission Comments, Issues and Recommendations:

- Welcomes the principles of the Strategy;
- Park and Ride should be considered at Brides Glen;
- Visual and physical impact of longer trams should be considered;

- Issues of Cherrywood town centre being able to accommodate a Metro terminus in terms of spatial requirements; and
- Luas extension to Bray should be prioritised.

Commentary / Response:

Park and ride provision is dealt with in section 5.10 of the draft transport strategy. This does provide for *“the provision of local park and ride facilities at appropriate locations on the rail network in the outer parts of the Metropolitan Area and in the Hinterland area, where they improve public transport accessibility without worsening road congestion, or increasing car travel distance”*.

The rail proposals in the draft transport strategy have been developed on the basis of likely future transport demand, and aligning the level of public transport provision to the likely level of passenger usage along a particular corridor. The implementation of the proposals of the draft strategy will be set out in the Integrated Implementation Plan, which will be developed following the completion of the Strategy.

The development of the Metro South project will be required to address the interaction with the Cherrywood town centre as part of its design development.

In relation to the Luas extension to Bray, the capacity issues on the existing Green Line are required to be addressed, through upgrading to Metro, in advance of such extension.

Submission No. 120

Name: Tara Cowley

Organisation: DAA

Summary of Submission Comments, Issues and Recommendations:

- Supports additional infrastructure proposed in strategy, in particular new Metro North;
- Leinster Outer Orbital should be considered to ensure continued carrying capacity of the M1 in vicinity of airport. This route should be developed rather than just reserved;
- Clarity required on BRT to Airport / Swords;
- Opportunity to build on employment base already at airport;
- Strategy needs to be more explicit in how it will achieve a 22% reduction in car mode share on motorway networks; and
- Need for more orbital movement.

Commentary / Response:

The draft transport strategy states in section 5.8.1: *“The Leinster Orbital Route is an orbital road proposal extending from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns. It would provide connections between these towns, currently poorly served by direct linkages, supporting their economic development and improvements in orbital public transport connectivity. While this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”*

In relation to the period in advance of new Metro North becoming operational, the Core Radial Bus Corridor along Ballymun Road could, and would, be advanced. Regarding the Swords Road corridor, the draft strategy states at section 5.5.4:

“In addition, on the Swords/Airport to City Centre corridor, it will be necessary to provide a higher level of public transport capacity than the existing provision, both in advance of new Metro North and also to serve areas south of the M50 subsequent to the implementation of new Metro North. This additional capacity will take the form of a BRT service or a BRT type service or a conventional bus corridor upgrade along this route or parts of this route. The exact arrangements to be implemented will be determined in conjunction with the development arrangements for new Metro North, and will be designed to be complementary to the new Metro North proposal. Accordingly, a BRT scheme is included for development along the Swords / Airport to City Centre corridor, but its extent may be reduced or it may be modified to a conventional bus corridor upgrade, in conjunction with the development of the new Metro North project.”

The reduction in the car mode share is the cumulative outcome of the strategy, based in part on improved alternative modes of travel coupled with future demand management.

The draft transport strategy includes (section 5.8.2) a specific commitment to “*enhance orbital movement, outside of the M50 C-Ring, between the N3, the N4 and N7 national roads, by the widening of existing roads and the development of new road links*”. In addition, a Core Bus Network of Orbital Corridors has been defined in the draft transport strategy.

Submission No. 121

Name: James Wickham

Organisation: Think tank for Action on Social Change

Summary of Submission Comments, Issues and Recommendations:

- Need for more consideration on how public transport can contribute to social inclusion;
- Reduced car dependency will aid social inclusion;
- Need to look outside existing demand to where people do not have access to good transport to aid social inclusion; and
- The strategy should have been benchmarked against transport systems elsewhere in Europe to highlight requirements for change.
- Projects should be prioritised and sequenced.
- The stop-go approach to investment in public transport is an issue, as is the loss in professional expertise due to the nature of this ‘short termism’ approach.

Commentary / Response:

This submission sets out a number of points which substantiate the requirement for improved public transport provision and accessibility across the GDA to improve the social welfare of society at large. The submission also raises the issue of how transport investment and planning is managed and fostered in Ireland. The academic references and points made are welcomed.

In relation to project sequencing, the relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport

Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

Submission No. 122

Name: RCPCA Committee

Organisation: Royal Canal Community Association and Rathbourne Community Association

Summary of Submission Comments, Issues and Recommendations:

- Support proposal to remove level crossings along Maynooth Line;
- Recommends the development of Pelletstown Station;
- Supports Luas Cross City, need to improve linkages to wider area, extension of Dublin Bikes and secure bike parking;
- Welcome BRT;
- Welcome Cycling and Walking measures; and
- Pragmatic approach to demand management required.

Commentary / Response:

This submission puts forward a lot of local data analysis, and, in general, is supportive of the measures proposed in the draft strategy.

On a number of specific points, in particular the location of a new station on the Maynooth line, and the extension of Dublinbikes there are specific mentions in the draft strategy. In particular, section 5.2.5 of the draft transport strategy states:

“Over the period of the Strategy, a number of additional stations will be added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Exact locations will be determined at the relevant time, but likely locations include Pelletstown on the Maynooth Line and Woodbrook on the South-Eastern Line.”

The more general support for BRT, walking, cycling and demand management is acknowledged.

Submission No. 123

Name: Karl Duffy

Organisation: Bridgedae M&D on behalf of Targeted Investment Opportunities ICAV

Summary of Submission Comments, Issues and Recommendations:

- Seeks rail line to Navan;
- Move M3 Toll beyond Pace P&R;
- Develop Leinster Outer Orbital Route;
- Increase rail capacity between Newbridge and Dublin City Centre;
- Direct shuttle bus between Sallins and Maynooth / Hazelhatch;
- Increase DART capacity to Greystones;
- Improve bus to Bray and Cherrywood from the Outer Hinterland; and
- More specific details on rail proposals south of Bray needed.

Commentary / Response:

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable. However, additional text is being added to the end of section 5.2.8 stating:

“The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.”

The tolling scheme on the M3 is subject to contract and any potential changes would not be appropriate in a 20-year regional transport strategy.

In relation to the Leinster Orbital Route, the draft transport strategy states in section 5.8.1: *“The Leinster Orbital Route is an orbital road proposal extending from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns. It would provide connections between these towns, currently poorly served by direct linkages, supporting their economic development and improvements in orbital public transport connectivity. While this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”*

The draft transport strategy provides for significant increases in heavy rail capacity in the Greater Dublin Area. The electrification of the diesel lines and the increase in frequency to a DART every 5 minutes will have a significant positive impact on journey times by rail across the region, including allowing for shuttle trains from beyond the DART network, interchanging at the termini of the DART. This will facilitate shorter journey times from the outer commuter belt to the city centre.

While bus movements to Bray and Cherrywood from the Outer Hinterland are not directly provided for in the strategy, they are not precluded, and such services will be supported by the Authority if demand is shown to exist.

The draft transport strategy provides for improvements in bus and train services (Chapter 6). Specifically, section 6.3 states *“[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones”*.

It is accepted that the existing track arrangements south of Bray will facilitate an enhanced train service. The strategy does not preclude further track enhancements along this corridor - section 5.2.8 states: “[a]dditional track works to enhance service efficiency”.

Action: Insert at the end of section 5.2.8 the following text:

The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.

Submission No. 124

Name: Don Nugent

Organisation: Dundrum Town Centre

Summary of Submission Comments, Issues and Recommendations:

- Welcome orbital bus proposals;
- Welcome green line extensions and enhancements; and
- Concerned over M50 multi-point tolling and should not be done in advance of better PT solutions.

Commentary / Response:

Positive statements noted, and while the concerns regarding demand management on the M50 are noted, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively.

Submission No. 125

Name: Kevin Enright

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Louth should be included;
- Include rail capacity issues on Northern Line;
- Concern over Navan line;
- Include Park and Share;
- Query over “frequent disruptions to rail services”;
- Welcomes DART Underground;

- Open stations between Drogheda and Dunleer;
- Build heavy rail line to Dublin Airport / Drop Metro;
- Need faster times by rail from Belfast to Dublin;
- Promote rail freight;
- Park and Ride should be free or have a nominal charge; and
- Extend Luas Red line to the north port.

Commentary / Response:

The draft transport strategy applies to the Greater Dublin Area (GDA) only as stipulated in the Dublin Transport Authority (DTA) Act.. While travel into the GDA from Louth, from Northern Ireland, and all other parts of Ireland, is accounted for in the strategy assessment, the proposals are limited to the 7 local authority jurisdictions of the GDA.

The strategy proposes to enhance rail capacity across the GDA, including on the northern line, through the DART expansion programme as far as Drogheda.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Park and Share is not regarded as a desirable solution for the GDA. Focus will be on improving public transport across the region to the extent that Park and Ride becomes an attractive option on every radial corridor.

In relation to disruptions in train services, referred to in Chapter 3, there are frequent occurrences of delays to rail services arising for a variety of reasons. However, the investments proposed in signalling, electrification and train control systems, as well as the removal of level crossings, will all contribute to providing a more resilient rail network.

The issue of a rail connection to Dublin Airport was dealt with in the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

In relation to movement of freight by rail, section 5.8.4 of the draft transport strategy states:

“Given the geographic size of Ireland and the proximity of Dublin Port to the various centres in the GDA, movement by road is, and will continue to be, the dominant mode of freight transfer in the region, and throughout the wider State. Accordingly, the management of the strategic (national) road network within the GDA is critical to the overall efficiency of freight movement. 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 charging arrangements at park and ride sites need to be examined on a case-by-case basis. In certain locations, the provision of free parking can mean that limited car park space availability is utilised by local residents who could walk or cycle to the station, displacing other users who have a more pronounced need for car parking space.

The modelling work undertaken in the draft transport strategy did not identify sufficient demand from the port to the city centre in order to justify the extension of the red line in this direction. The planned development of Poolbeg, instead, has led to the proposal to extend the line over the Liffey to this area.

Submission No. 126

Name: Cormac Rabbitt

Organisation: Metro Dublin

Summary of Submission Comments, Issues and Recommendations:

- Requests support of the Metro Dublin Development Project.

Commentary / Response:

Part of the Metro Dublin proposal was considered during the Fingal / North Dublin Transport Study which examined 25 different solutions to address Dublin Airport and Swords and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

Submission No. 127

Name: Damien O'Tuama

Organisation: Dublin Cycling Campaign

Summary of Submission Comments, Issues and Recommendations:

- Need to generate a holistic approach to generating safe cycling conditions;
- Bring public realm elements into walking;
- Re-insert statement from previous strategy regarding a presumption against road development;
- Climate change targets need to be included;
- A reference to funding for cycling should be inserted;
- Opposed to new Metro North;
- Clarity is required on the status of the Swords/Airport to City Centre BRT scheme;
- Disagrees with all additional road schemes, including Slane bypass;
- Supports Tallaght BRT;
- Supports DART Underground;
- Clarify level crossings closures north of Bray;
- Secure bike parking to be provided at stations;
- Move away from diesel buses;
- Welcome for segregated cycle facilities;
- Suggest improvement to time-plating for cycle lanes;
- Seeks wider adoption of lower speed limit of 30kph;
- Welcome commitment to enforcement of cycle lanes;
- More ambition needed in relation to rail freight; and
- Consider Park and Ride at Tallaght and closer to Naas.

Commentary / Response:

In relation to road development, the draft transport strategy has sought to provide certainty on the national road schemes that the Authority will support over the period of the strategy. As such, these are all listed in 5.8.1. In relation to local and regional roads, with the exception of a new orbital route from the N81 to the N3, it was deemed more appropriate to deal with these by way of general principles.

Specific proposals in relation to funding for cycling will be dealt with in the Integrated Implementation Plan.

The Fingal / North Dublin Transport Study examined 25 different solutions to address Dublin Airport and Swords and recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

In relation to BRT along the Swords Road corridor, the draft transport strategy states at section 5.5.4:

“In addition, on the Swords/Airport to City Centre corridor, it will be necessary to provide a higher level of public transport capacity than the existing provision, both in advance of new Metro North and also to serve areas south of the M50 subsequent to the implementation of new Metro North. This additional capacity will take the form of a BRT service or a BRT type service or a conventional bus corridor upgrade along this route or parts of this route. The exact arrangements to be implemented will be determined in conjunction with the development arrangements for new Metro North, and will be designed to be complementary to the new Metro North proposal. Accordingly, a BRT scheme is included for development along the Swords / Airport to City Centre corridor, but its extent may be reduced or it may be modified to a conventional bus corridor upgrade, in conjunction with the development of the new Metro North project.”

Regarding lower speed limits, section 5.7 of the draft transport strategy does provide for this measure. An amendment will be made to include “urban centres” in the lower speed proposals.

The exact details regarding the treatment of individual level crossing closure proposals will be developed at the individual project level.

In relation to movement of freight by rail, section 5.8.4 of the draft transport strategy states:

“Given the geographic size of Ireland and the proximity of Dublin Port to the various centres in the GDA, movement by road is, and will continue to be, the dominant mode of freight transfer in the region, and throughout the wider State. Accordingly, the management of the strategic (national) road network within the GDA is critical to the overall efficiency of freight movement. 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.”

In relation to climate change issues and vehicle technologies, a new section 8.5 will be added to the draft transport strategy to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Park and Ride is proposed where the national road network meets the metropolitan public transport network, generally close to, but most effectively outside, the M50. A park and ride exists at Tallaght and the Red Cow is regarded as the most appropriate site for P&R along the N7. The extension of both is not precluded by the strategy, but capacity enhancements to the Red line may be required. Similarly the expansion of parking at Naas/Sallins is not precluded.

Actions:

In section 5.7, replace “In conjunction with local authorities and An Garda Síochana, evaluate, and where appropriate seek the introduction of, lower speed limits on residential streets;” with “In conjunction with local authorities and An Garda Síochana, evaluate, and where appropriate seek the introduction of, lower speed limits on residential streets and in urban centres;”

Insert a new section 8.5 to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Submission No. 128

Name: Colm Cummins

Organisation: ESB

Summary of Submission Comments, Issues and Recommendations:

- Emphasise need to decarbonise transport;
- Restrict access to only Low and Zero Emission (LZEV) vehicles in certain places;
- Incentivise LZEV at Park and Ride sites by reserving spaces and providing infrastructure;
- Strategy should promote carsharing using LZEV;
- Strategy should reference LZEV taxis; and
- Welcome bus fleet replacement and LZEV delivery in Dublin city centre.

Commentary / Response:

The objective of the draft transport strategy is “[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.” This objective focusses on “efficient” and “sustainable” movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

A new section 8.5 will be added to the draft transport strategy to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Action: Insert a new section 8.5 to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Submission No. 129

Name: Seán Óg Crudden

Organisation:

Summary of Submission Comments, Issues and Recommendations:

- Provide open data access to real-time transit data.

Commentary / Response:

While this is outside the ambit of the draft transport strategy, it is the Authority's intention to make relevant data available on an open source basis.

Submission No. 130

Name: Chris McGarry

Organisation: NAMA

Summary of Submission Comments, Issues and Recommendations:

- In agreement with planning principles;
- Agreement with strategic approach to delivery of housing and employment alongside infrastructure;
- Acknowledges the importance of bus transport; and
- Proposes that NTA should encourage the completion of local area plans by local authorities.

Commentary / Response:

The support of the provisions of the draft transport strategy are acknowledged and welcomed.

It is the intention of the NTA to encourage, support and assist local authorities, on an on-going basis, in the preparation of local areas plans to guide local development.

Submission No. 131

Name: Keith Byrne

Organisation:

Summary of Submission Comments, Issues and Recommendations:

- Too much emphasis on roads;
- Focus should be on cycle network;
- Park and Ride should include cycle parking;
- Provide off-street bike parking;
- Facilitate carriage of bikes on off-peak public transport;
- Bus stop designs need to cater better for cyclists;
- Integrate Leap and bike schemes;
- Expand Leap top-up network;
- Tag-on and tag-off on buses;
- Remove cash fares; and
- Need an orbital Luas / BRT or Heavy Rail.

Commentary / Response:

The draft transport strategy has been developed to provide an integrated, balanced transport system for the Greater Dublin Area. While some new road infrastructure will be required, this is limited, and it should be noted that no additional radial road capacity inside the M50 is proposed.

In relation to cycling infrastructure, the draft transport strategy commits to the delivery of the Greater Dublin Area Cycle Network Plan as stated in section 5.6.

In respect of cycle parking, section 5.6 states that it is intended to:

- *“Provide for sufficient on-street public cycle parking at key destinations such as bus and rail stations, schools, colleges, hospitals and large workplaces, particularly in urban areas;*
- *Provide for off-street public cycle parking, including secure lockers, in a number of car parks in Dublin City Centre, and investigate the feasibility of such facilities in other urban areas.”*

The design of bus stops to cater for cyclists is covered in the National Cycle Manual.

The draft strategy provides for a move towards cashless buses and states in section 6.4 that “[a]ll bus services will migrate to a cashless system, to facilitate driver safety and faster passenger boarding times.”

In relation to orbital movement, this was the subject of major studies feeding into the strategy. The future demand for travel can be catered for by conventional bus, with appropriate bus priority.

The issue of the carriage of bicycles on public transport is an operational issue which can be dealt with separately on a mode-by-mode basis.

Submission No. 132

Name: Donal Keating

Organisation: Dublin Bus

Summary of Submission Comments, Issues and Recommendations:

- Strategy needs to include traffic light priority, bus gates, queue jump facilities across the core bus network to allow Dublin Bus to have a positive impact in the short-medium term, i.e. apply BRT principle to entire network;
- UCD BRT line could be extended to Stillorgan and Dún Laoghaire / Cherrywood;
- Enhance Bus / Cycle interchange;
- Extend dublinbikes;
- Welcome other bus measures;
- Care is needed in the rationalisation of bus stops and consolidation of several services at one stop;
- There is a need for a far more ambitious, broader plan for bus in Dublin;
- Alternative propulsion methods should be looked at;

- Propose BHLS along core network including earlier start and finish times; increased weekend and off-peak frequency; Limited stop or express services on core radials; 24 hour service on core radials;
- No fleet provision included;
- Concerned over model outputs for bus usage; and
- Enforcement of bus lanes required.

Commentary / Response:

The submission provides a comprehensive review of the draft transport strategy and is supportive of many of its measures and objectives. While many of the items raised in the submission are addressed within the published documents, responses to certain of the items are provided below.

Regarding bus priority, section 5.5 of the draft transport strategy states: *“[i]n order to ensure an efficient, reliable and effective bus system, it is intended, as part of the Strategy, to develop the Core Bus network to achieve, as far as practicable, continuous priority for bus movement on the portions of the Core Bus Network within the Metropolitan Area.”*

Alternative propulsion methods and the move towards a low emission fleet are catered for under 5.5.6 which states *“Continual replacement and upgrading of the bus fleet with vehicles that meet or exceed EU emissions standards”*

To allow for the future further extension southwards of the proposed Blanchardstown to UCD BRT scheme, the text in section 5.5.4 will be amended to insert the additional text after the listing of the two BRT schemes: *“The routes of these two BRT schemes are indicative and subject to design development. Such design development may include changes to the routes and /or terminal points of the schemes, including further extension of the routes.”*

Cycling and bus interchange is provided in the draft transport strategy in section 6.6 which states: *“Subject to demand and available space, provide cycle parking stands at key bus stops.”*

In regard to the draft transport strategy not being ambitious enough in relation to bus transport, the proposals have been developed to provide an integrated, balanced transport system for the Greater Dublin Area, with an extremely strong emphasis given to the bus mode.

Fleet replacement is addressed in section 5.5.6 which states as an objective the *“[c]ontinual replacement and upgrading of the bus fleet with vehicles that meet or exceed EU emissions standards.”*

In relation to model outputs for bus usage, it should be noted that overall public transport use, comprising bus, BRT, light rail and heavy rail, is increasing significantly over the period of the Strategy, which is a core objective of the measures set out.

The need for enforcement of bus lanes is acknowledged.

Action: Insert the following text as the second last paragraph of section 5.5.4:

“The routes of these two BRT schemes are indicative and subject to design development. Such design development may include changes to the routes and /or terminal points of the schemes, including further extension of the routes.”

Submission No. 133

Name: Stephen Little

Organisation: Stephen Little & Associates on behalf of Teba, Irish Life Assurance plc and IPUT, c/o Pavilions Co-Ownership

Summary of Submission Comments, Issues and Recommendations:

- The function and success of the Swords Pavilions as a shopping destination should be protected in any of the works (nMN, BRT) planned by the NTA to ensure that it continues to perform its designated planning role;
- Welcomes the increased accessibility to the Swords Pavilions from the proposed public transport projects; however states that this cannot be allowed to result in reduced accessibility for private car;
- Expansion of the Pavilions as granted under planning permission (Reg Ref. F08A/1057) will increase car parking from 2,000 spaces up to 4,000 spaces. It is expected that this increase has been accounted for in the NTA's assessment of the area;
- The NTA's plans for Swords must accommodate the planned, permitted and envisaged increase in car usage in the vicinity of the Pavilions;
- Expresses serious concerns regarding the implications of the BRT Swords project on Pavilions, particularly on the impact on accessibility of the centre and, through technical analysis of this, is highly sceptical that the BRT, as currently envisioned, can be integrated into Swords without causing massive disruption to the operation of the existing Pavilions; and
- Seeks recognition within the final Strategy of the importance to the economic success of urban centres of retailing and that the trips associated with retail developments of not follow the norms of average commuter traffic.

Commentary / Response:

The level of transport demand used in the transport strategy was derived from the CSO and RPG forecasts in conjunction with the local authorities, including the level of employment and retail.

It is the objective of the NTA to provide transport to meet demand in 2035 and to facilitate significantly increased numbers of customers to places like Swords and the Pavilions. This can only be achieved by providing high-quality, high-capacity public transport. Some degree of disruption is inevitable during the construction of public transport schemes, and the Authority, in cooperation with all other stakeholders, will seek to minimise this.

The strategy does recognise the importance of retail and has proposed significant, unprecedented levels of transport investment to serve all major suburban shopping centres.

Submission No. 134

Name: Ian Lumley

Organisation: An Taisce

Summary of Submission Comments, Issues and Recommendations:

- The Strategy needs to achieve a timetabled and clearly implementable programme to address current mounting congestion and traffic generated pollution and climate emission impact
- The definition of corridors and evaluation of options for each is welcomed.
- Specific climate targets need to be set out in the Strategy which are adequate to meet Ireland's 2020 obligation and for the much higher emissions cuts that will be needed post 2020.
- Section 6.10 of the Strategy fails to define the level of air quality targets needed for the GDA to achieve a public health standard in accordance with World Health Organisation. In the area of bus procurement and operation standards, the most progress achieving emissions standards should be sought
- The Strategy adopts 'Smarter Travel' target of reducing car based workplace travel to 45% however a significantly higher target should be set for the GDA if this is to be met nationally
- Section 5.9 is inadequate on the specific adoption of effective demand management measures. Clear demand management targets for the M50 and main arterial motorway corridors should be adopted
- With the abandonment of Metro West further planning is required for greater public transport provision in the western radial area (Dublin Airport, Blanchardstown, Leixlip and other locations with growing demand)
- The Strategy does not properly address the role of the NTA as a prescribed body in the planning process
- Section 5.11 is inadequate on specific adoption of effective parking management measures, through reduction in parking provision and parking charges. The concept of free parking must be curtailed with a charging regime
- Immediate emergency measures to reduce traffic generation, congestion and emissions through new park and ride services, workplace and school travel plans, cycling enhancement and promotion of car sharing should be introduced through a task force between the Department of Transport, NTA, Local Authorities, communities, business and environmental organisations. An Taisce can play a constructive role in this

Commentary / Response:

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the subsequent six years. It is within the context of the Integrated Implementation Plan that priorities will be set and timetables set out. It is more appropriate to set out timetables in this manner, as more certainty can be provided in relation to funding. In addition, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

The draft transport strategy has sought to achieve the Smarter Travel national targets. No GDA-specific target exists. It should be borne in mind that a significant proportion of the GDA's population live in rural areas and small towns, and many work in peripheral locations. These locations would be as car dependent as the rest of Ireland.

The draft transport strategy supports demand management to realise the full potential of the measures proposed and to manage the increasing congestion on the radial national routes and the M50, which will undermine the strategic function of these routes. The details of the demand management will be developed on a case by case basis but will involve additional tolling on the M50 and on key radial

national routes. The legislation provides for the NTA to be consulted on development zoning and planning applications.

In relation to orbital movement in the absence of Metro West, this was the subject of major studies feeding into the draft transport strategy. The future demand for travel can be catered for by conventional bus, with bus priority.

Section 5.11 addresses the issue of parking.

The objective of the draft transport strategy is “[t]o contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.” This objective focusses on “efficient” and “sustainable” movement, and fully aligns with movement towards lower emission vehicles.

Other Government policies are under development, including legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. This will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”. It will be these policies that will establish the required energy related targets to be adopted across the transport sector.

A new section 8.5 will be added to the draft transport strategy to state:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Actions: Insert a new Section 8.5 into the draft transport strategy stating the following:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Organisation: Society of the Irish Motor Industry (SIMI)

Summary of Submission Comments, Issues and Recommendations:

- Some data is used incorrectly using National car sales increase statistics rather than the regional Vehicle Parc Data to illustrate trends in relation to car use;
- Demand management only works and should only be considered when those who are the focus have been provided with workable alternative;
- Supports better public spaces with safe pedestrian and cycling access but car based consumers spend more when shopping than those using other modes. Ignoring this has seen businesses migrate out of the city centre. What is needed is a focus on how Dublin can manage its traffic and provide consumer friendly alternative;
- Moving large numbers of commuters is best done by high-speed off-road Metro lines;
- The provision of rail solutions to the Airport and other radial locations and the DART Underground are urgently needed;
- The Navan rail line has been rejected on the basis of current calculations rather than its ability to attract demand in the future;
- Serious consideration of an Eastern bypass is not examined in detail;
- On the Western side of the city the previously proposed Outer bypass has gone so that the M50 also takes traffic from other areas such as Mullingar; and
- Proposals to restrict commuter traffic should only be considered after the implementation of a hugely improved public transport system (including Metro, park and ride, additional bypass routes to reduce strain on M50).

Commentary / Response:

The car sales data is not incorrect. It is the official national statistic and is presented as such.

The Strategy supports demand management to realise the full potential of the measures proposed and to manage the increasing congestion on the radial national routes and the M50 which will undermine the strategic function of these routes. The details of the demand management will be developed on a case by case basis but will involve additional tolling on the M50 and on key radial national routes.

The Navan line is not included due to forecast future demand. The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only "Large Growth Town I" designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

In relation to the Eastern Bypass, the draft transport strategy states in section 5.8.1 *"[s]imilarly, in the case of the Eastern Bypass, while the section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in this Strategy, the remainder of the route is not proposed for development during the Strategy period. However, the retention of a route corridor for this scheme is recommended,*

to facilitate the possible future use of the corridor for transport provision.” Detailed examination will take place in the future.

The draft transport strategy states in section 5.8.1: *“The Leinster Orbital Route is an orbital road proposal extending from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns. It would provide connections between these towns, currently poorly served by direct linkages, supporting their economic development and improvements in orbital public transport connectivity. While this project is not planned for implementation during the period of the Strategy, the finalisation of the route corridor and its protection from development intrusion is recommended.”* As such, this proposed outer bypass remains a long-term objective.

It is not the intention to restrict commuter traffic, but to provide for the most effective solution for the significant increases in travel demand into the future.

Submission No. 136

Name: Ruadhan MacEoin

Organisation: Mountjoy Square Community Group

Summary of Submission Comments, Issues and Recommendations:

- Focuses on the Dublin-Airport light rail link assessing the preferred metro option along side Option LR3 (Glasnevin Cemetery) and LR4 a variant of LR3;
- It is logical that any new connection should tie in with the DART;
- The section of underground route linking DCU to the city centre appears unnecessary as overland corridors do not appear to have been evaluated;
- A DCU-Broadstone overland route passing Cross Guns Bridge would be of significant strategic benefit, provide for interchange and serve a greater catchment;
- Lack of consideration has been given to the extent of the existing rail network and has resulted in findings that do not bear scrutiny;
- Proposals for the route through the airport to Swords appear not to have considered an overland route and the preferred underground option does not seem warranted;
- A balloon loop at Docklands would remove existing capacity impediments;
- Much of the study area was also covered in the North Dublin/Fingal Study (NTA reports Nov 2014 and June 2015) however not much in the way of future provision for the area is included; and
- Incomplete consideration given to previous studies has failed and fails to adequately address the challenges and opportunities within the existing rail network.

Commentary / Response:

The submission carries out a very detailed review of the Fingal / North Dublin Study, examining alternatives and variants to the selected proposal, new Metro North, from that study.

The background to the new Metro North project is that a major study was undertaken to evaluate the various competing projects that had been proposed to serve this corridor, in particular the key destination of Dublin Airport.

That Fingal / North Dublin Transport Study examined 25 different solutions to address the long-term public transport demands along the Swords / Dublin Airport to City Centre corridor. After an initial assessment exercise, a shortlist of six projects was identified for detailed evaluation, and this formed the second phase of the study.

The outcome of that detailed analysis was a comprehensive report which recommended the development of the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

Submission No. 137

Name: Councillor Derek Mitchell

Organisation: Fine Gael, Wicklow County Council

Summary of Submission Comments, Issues and Recommendations:

The submission states that the draft transport strategy “needs to be radically changed for Wicklow”. The submission addresses many issues related to DART services, commuter train services and bus services to the general Wicklow area. Among the various issues and proposals identified in the submission are:

- Concern that the NTA transport model indicates too low a transport demand for Greystones;
- Comments that the regional planning guidelines require a 49% population growth whereas the draft transport strategy predicts only a 26% increase in demand;
- Wicklow line, despite existing connection to Pearse, gets no extra diesel train slots at Pearse, unlike Kildare line, Maynooth line and Northern line;
- Additional train services required from Arklow and Greystones;
- Strategy omits mention of Fassaroe and LUAS branch to there, despite significant planned population increase in County Development Plan;
- Extra park & ride facilities required at stations;
- Operational train movement arrangements to be addressed at Greystones;
- Extra bus services required;
- Provision of a footpath to Kilcoole Station and pedestrian / cycle bridge at Greystones;
- Double track north of Greystones to the tunnel;
- Provide for Rail / Luas interchange in Bray;
- Higher speeds needed from Dun Laoghaire to Sandycove; and
- Additional train stations at Newcastle and Avoca.

Commentary / Response:

The existing track arrangements south of Bray can facilitate an enhanced train service. Work carried out by the Authority indicates that the frequency of services from south of Greystones can be increased on the basis of the existing track infrastructure. By increasing the DART frequency to Greystones, there is the opportunity for an overall enhanced level of service based on interchange at Greystones.

This is covered in the draft transport strategy in section 6.3 which states: *“[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones”*. In addition, the draft transport strategy does not preclude further track enhancements along this corridor - section 5.2.8 states: *“[a]dditional track works to enhance service efficiency”*.

The provision of additional park & ride facilities at stations is provided for in the published document – section 5.10.

The importance of interchange between transport modes and transport services is fully recognised in the draft transport strategy. Appropriate interchange facilities at Bray will be developed.

The population and employment projections used in the draft transport strategy align with the proposals set out in the Regional Planning Guidelines.

In relation to verification of transport demand, the transport model used in the development of the draft transport strategy has been fully calibrated and validated against base year surveys and correctly reflect actual transport movements.

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic.

Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

Provision of a footpath at Kilcoole and the provision of a pedestrian / cycle bridge at Greystones are fully supported by the draft transport strategy.

The achievement of higher speeds on the DART system between Dun Laoghaire and Sandycove is something that can be examined as part of the operational arrangements for the DART service.

In relation to the provision of additional stations on the rail network, the draft strategy states: *“[o]ver the period of the Strategy, a number of additional stations will be added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Exact locations will be determined at the relevant time, but likely locations include Pelletstown on the Maynooth Line and Woodbrook on the South-Eastern Line.”* This provision will facilitate the development and opening of additional stations at appropriate locations.

Submission No. 138

Name: Alan Myles

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- The proposal to close level crossings on the Maynooth line at Coolmine is totally unnecessary;
- The plans for a bridge will be detrimental to the area in terms of loss of green space, increased traffic, disruption caused by construction and poorer access to local amenities
- Suggests improving signalling and developing a new train control centre to manage operations; and
- The return on investment would be greatest by removing the need to build bridges or remove crossings.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the level of closures of the road crossing will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, need to address, as part of its development, the types of issues set out in the submission.

Submission No. 139

Name: Des O'Brien

Organisation: Wicklow County Council

Summary of Submission Comments, Issues and Recommendations:

- The model appears to assume that the city centre is the employment core with other parts fulfilling a residential function with passengers embarking at points on the way to the city and, for the most part alighting in the city centre. (SE corridor study pg 64). This does not reflect 'planning policy' nor reality;
- The public transport model has to factor in demand other than those to the city centre (orbital, in opposite direction);
- In paragraph 7.1.2 there is an assertion that strategy and local planning principles support the development of 6 named areas, that are for the most part greenfield sites. This is untrue. To highlight these and exclude existing settlements that can cater for residential development is moving away from existing planning principles;
- No mention is made of the extensive development area to the west of Bray as incorporated in the Bray Environs Local Area Plan;
- Sufficient regard has not been had of the Regional Planning Guidelines for the Greater Dublin Area;
- Concern with regard to the modelling carried out in relation to employment growth in Wicklow in particular relating to growth in Bray/Fassaroe. Wicklow County Council drew the NTA Strategy team's attention to this during the consultation and research stage of the Strategy and remain concerned that the inputs have not been taken into account;

- Remind the NTA that they must have regard for Development Plans and feels that sufficient regard has not been taken;
- There has been a significant shift in the conception of the proposed B2 light rail extension from Cherrywood to Bray. Paragraph 5.3.6 intimates that the likely line is to be via Shankhill – this does not make planning or commercial sense;
- The SE Corridor Study refers (pg 63) to existing park and ride at Bray. There is not park and ride and Bray and it would not be feasible;
- The Strategy does not adequately deal with the reality that many journeys ex Wicklow are to points other than the city centre. The option of bus routes using the M50 with good interchanges with radial bus routes has not been investigated;
- The Strategy appears to ignore some of the key constraints that effect Wicklow (i.e standstills from Kilmacanogue to Kilpedder during the morning peak);
- There are a number of errors, particularly in the SE Corridor Study;
- There are a number of statements that are counter intuitive:
 - the growth for 2035 seems low at 26% (pg 17);
 - the enhancement of DART to 6minute departures from Greystones seems unlikely;
 - the projected numbers for peak hour Greystones appear to be less than at present;
- More schools are attracting pupils from outside their traditional catchments. Should a transport strategy seek to have rules changes so that state financed primary schools must give preference to pupils who live closest to the school?
- It should be an objective to supply a local road network to take traffic off the national route and to limit the multiplicity of junctions onto route N11 around Bray;
- Section 3.3.1 refers to suburban retail development. The Council feel that Bray should be set apart as an exemplar of good practice compared to the likes of Liffey Valley or the Kildare outlet;
- South of Greystones the roads are full and the rail line empty - investment is needed to address this;
- There are 3 different transport solutions in different parts of the Strategy but none have been adequately thought through; and
- The assumptions do not reflect the current or projected transport needs of Co Wicklow and ignore the Regional Planning Guidelines and Wicklow County Development Plan policies.

Commentary / Response:

The model includes all employment locations outside Dublin City Centre, as identified by the NTA in consultation with the regional authority and each local authority, based on an agreed methodology for the derivation of an employment figure for the GDA in total. It is not feasible to take the bottom-up approach advocated here, utilising an aspirational list of employment numbers on a site-by-site basis based on legacy zonings. Such an approach would lead to a significant over-estimate of travel demand when applied on a regional basis.

The reference to an exclusive list of six sites in section 7.1.2 is incorrect. The full statement in the draft transport strategy is “[a]t the most strategic level, the principles above support the development of areas **such as the NorthFringe / Clongriffin, Hansfield, Adamstown, Clonburris, Stepside, Cherrywood and all locations inside the M50**, for residential development throughout the period of the Strategy (emphasis added).” It is not an exclusive list – the six referenced sites are simply examples of key development sites in the GDA.

The strategy is in full compliance with the Regional planning Guidelines. In developing the strategy, the NTA has to take a regional, strategic top-down approach to the forecasting of population and employment levels in every electoral area. In the case of Wicklow, those forecasts were derived in the exact same manner as the equivalent forecasts were derived for the other six local authority areas,

ensuring that the total forecasts married with the overall regional forecasts. The travel demand for Wicklow, as assessed in the strategy, and the emerging proposals, reflects this approach.

In relation to the development of Fassaroe, it is recognised that public transport services will need to be provided to that development area. Extending the Luas Green Line to serve that area is not currently feasible due to the capacity constraints that currently exist on the Luas Green Line. With the growth of areas such as Sandyford and Cherrywood, the existing Luas line will not have the capacity to carry the predicted number of passengers along this corridor. While lengthening of the trams to 50+ metres and increasing services will provide additional capacity in the short-term, further carrying capacity can only be delivered by upgrading to metro operation, which means the system is fully segregated from road traffic. Accordingly, given that reality, and the scale and location of proposed development at Fassaroe, it is intended to serve the public transport requirements at Fassaroe using bus-based transport.

In relation to various comments in relation to travel growth, as well as the population and employment projections used in the draft transport strategy being aligned with the proposals set out in the Regional Planning Guidelines, the translation of population growth into travel demand increases across various screenlines is function of several other factors.

Regarding the catchment areas of schools, it is outside the remit of a regional transport strategy to direct school enrolment policy.

In relation to the development of a local road to take traffic off a national road, the draft transport strategy has avoided developing an exhaustive list of local road schemes to cover a 20 year period. Instead, it has established “Principles of Road Development” set out in section 5.8.3. Accordingly, it is open to Wicklow County Council to advance such local road proposals, subject to compliance with the stated principles.

The issues along the N11 corridor are recognised within the draft transport strategy. In particular, section 5.8.1 commits to “[c]apacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford).”

The reference to 6 minute DART service in the background technical report, relates to a potential service from Bray northwards. It is accepted that such a service is not possible from Greystones with the current track arrangements.

The draft transport strategy does include proposals to enhance train services from the Wicklow area. Specifically section 6.3 states “[i]ncreased passenger capacity will be provided on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones.”

Figure 5.9 of the draft transport strategy indicates a potential Park and Ride site, not at Bray but just north of Bray at a proposed new DART station at Woodbrook.

The reference to Bray in the final paragraph of section 3.3.1 is simply a factual statement in relation to plans that have been advanced to develop a major retail development in North Bray in recent years.

Submission No. 140

Name: Jimmy Young

Organisation: Meath County Council

Summary of Submission Comments, Issues and Recommendations:

- Concerns raised in relation to the extension of the Navan rail line (Section 4.2.2) which states that there is insufficient demand to justify the development of a high capacity rail line;
- The provision of a heavy rail link from Dublin to Navan is considered critical for the sustainable development of Meath County and the Development Plan for Navan is predicated on this. It is not clear how that bus interchange alternative proposed in the draft Strategy would provide a comparable offer;
- It is considered that the 'Background Technical Paper on the Navan Study Corridor' does not fully take account of the situation pertaining to the rail line;
- Strongly object to the wording included in the draft Strategy in relation to the Navan rail line and the strategy should be changed to reflect that it remains an important objective for the GDA. The Council also views the deferral of the scheme for the life of the Strategy as unsatisfactory;
- Supports that the Strategy purpose aligns the movement of people and goods in a way that contributes to the economic, social and cultural progress of the GDA;
- There needs to be more effort to engage with government departments in relation to accessibility and infrastructure provision relating to demand generated by schools;
- Welcomes the intention to implement DART Expansion but requests that Section 5.2 is expanded to include the spur to Dunboyne and the M3 parkway. Suggests that these should also be added to Section 4.2.2;
- Welcomes "Other Bus related measures" (Section 5.5.6) and suggests that a study is progressed to consider how the core bus network could expand into those areas in the metropolitan boundary which will develop over the life time of the Strategy;
- Expresses commitment to working with the NTA on bus interchange facilities in Navan which are viewed as complementary to the rail service to Navan rather than an alternative;
- Reiterates that the Navan Town bus service should be reviewed and enhanced;
- Cycling has the greatest potential for expansion in County Meath – funding for this should be a priority;
- Requests research to produce a report on the effects of pedestrianisation in settlements in Ireland;
- A specific reference should be made to the retrofitting of pedestrian and cycling facilities on national roads improvements particularly where they include bypasses around villages and towns;
- Welcomes proposals for junction upgrades and capacity improvements on the M1;
- Requests that the wording of the proposal in Section 5.8.1 to widen the M3 between Junction 1(M50) and 4 (Clonee) is amended to include junction 5 (Pace);
- Strongly supports the inclusion of the intention to carry out enhancement of the N2/M2 national road inclusive of a bypass at Slane;
- Suggests that a clear statement in relation to the N2 is included in the Strategy recognising its importance as a national road and making it clear that the carrying capacity and function, including the movement of goods, should be protected and enhanced;

- Requests a commitment to major upgrade of the N2 to dual carriageway standard between Rath Roundabout north of Ashbourne and the N2/R152 junction at Kilmoon Cross;
- The Strategy should make the Leinster orbital Route a greater priority than current wording suggests and should support its delivery during the lifetime of the Strategy;
- The Strategy should lend weight to the upgrade of the N52 given its strategic national importance;
- Requests that the following statement is clarified: *‘That alternative solutions, such as public transport provision, traffic management or demand management measures, cannot effectively and satisfactorily address the particular circumstances prompting the road proposals or are not applicable or appropriate’*;
- Asks for clarification on the extent and type of measures that are intended by the phrase *‘demand management measures on the radial national routes approaching the M50 motorway (M1, M2/N2, N3/M3, N/M4, N/M7, M11) to ensure that these routes retain sufficient capacity to fulfil their strategic functions including freight movement’*;
- The potential for bus based park and ride should be assessed at an early stage in the life of the Strategy to feed into an overall plan for park and ride across the GDA;
- Under Section 8.3 suggests that the phrase ‘will avoid constraints and meet opportunities to the optimum extent, advised by relevant specialists’ is unrealistic and should be removed; and
- The Council will brief their Oireachtas representatives on their concerns.
- Address international function of Corridor A in Chapter 3
- A distinct corridor for the N/M 2 should be created
- Strategy should address Tayto Park’s success as a tourism destination in the context of the N/M2 corridor
- Corridor C should reference Enfield
- Origin of the segments is unclear
- Include a prioritisation of the measures
- Provide BRT to Ashbourne
- Review period should be incorporated into the strategy process re: RSES etc.
- Re-examine wording in relation to economic development and the need for outer counties to increase economic activity
- A submission for Cllr. Sean Smith is included as Appendix 1 which proposes the following
 - A rail line to service Ashbourne connecting Dublin Airport to Pace and Dunboyne;
 - Park and Ride north of Ashbourne;
 - Upgrade of M2/N2 from Ashbourne to Slane;
 - Outer Orbital motorway from Drogheda through Navan to Naas; and
 - Connection of Ashbourne to Ratoath with footpath and cycle ways.

Commentary / Response:

The importance of Navan as the county town of Meath and its designation as a “Large Growth Town I” in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, was fully recognised in the development of the draft transport strategy.

Extensive work was undertaken to assess the likely public transport demand associated with the future development of Navan and its environs. That analysis included use of the Greater Dublin Area Transport Model to identify likely future transport patterns to and from Navan.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

In relation to the provision of a rail line to Ashbourne, serving Dublin Airport and connecting to the existing network at Pace, the level of passenger demand on this corridor would not justify the provision of a rail service.

In relation to school trip demand, the draft Strategy acknowledges the issue of the management and use of the local road network in Section 4.3, and states that ‘it is intended to focus on the provision of the necessary infrastructure and services to facilitate more local movement by sustainable transport modes’.

The DART Expansion Programme does include for the electrification of the spur line to Pace/Dunboyne. The electrified section of the overall rail network is shown in Figure 5.2 of the draft transport strategy and includes the Pace/Dunboyne link in red.

The draft transport strategy strongly recognises the role of bus-based transport across the region and its fundamental role in providing the needs of the majority of public transport users across the Greater Dublin Area. Central to that role is the development of the Core Bus Network, with a much enhanced level of priority for buses on these corridors. The strategy supports the development of a bus hub in Navan, in conjunction with enhanced bus services along the N/M3.

The GDA Cycle Network Plan proposes to expand the urban cycle network to over 1,485 km in length, and will provide over 1,300 km of new connections between towns in the rural areas of the GDA. As part of the Strategy it is intended to implement this network in full, delivery safe, high quality cycle facilities, which will be designed and constructed in accordance with the principles set out in the National Cycle Manual. Likewise in section 5.7 of the draft Strategy proposals for the improvement and promotion of walking and pedestrianisation are set out.

A number of proposals have been put forward in relation to various road schemes. Having considered the proposals and the current wording in the draft transport strategy, it is not proposed to amend the draft transport strategy in these areas.

The details of the demand management will be developed on a case by case basis but will involve additional tolling on the M50 and on key radial national routes.

Park and ride provision is dealt with in section 5.10 of the draft transport strategy.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

Ashbourne is situated outside the contiguous built-up area of metropolitan Dublin. As a BRT service comprises a large proportion of standing passengers, it would not be suitable as a service to Ashbourne, given the distance involved.

The legislation provides for the 6-yearly review of the transport strategy. The Authority works closely with central government departments and agencies, and the regional and local authorities in order to achieve consistency across all plans and programmes.

In relation to economic development in Meath, the strategy does not restrict such development, as stated in this submission. It states that trip-intensive development should *primarily* be *focussed* into Dublin City Centre and higher order RPG centres. This is consistent with prevailing policy and with the principles and proper and sustainable integration of land use and transport planning.

In relation to the appendix attaching the submission of Cllr. Sean Smith, this has been received separately and has been included as Submission No. 42.

Action: Insert at the end of section 5.2.8 the following text:

The corridor previously identified for a rail link to Navan should be protected from development intrusion pending a re-evaluation, as part of the next Strategy review, of the likely future usage of such a rail connection, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs, together with any additional or revised information on the future development potential of these areas then available.

Action: Replace the second paragraph of section 4.2.2 with the following text:

“The extension of the commuter rail line to Navan has been previously proposed and has been assessed in the examination of this corridor. Based on current population and employment forecasts, the level of travel demand between Navan, Dunshaughlin and various stations to the city centre is insufficient to justify the development of a high-capacity rail link at this time. To serve this corridor, it is proposed to provide an enhanced bus service along the M/N3 in conjunction with the development of a bus hub in Navan.

It is intended that, as part of the next Strategy review, the likely future usage of a rail connection to Navan will be reassessed, taking into account the level of development that will have taken place over the next six years in Navan and Dunshaughlin and their environs. Pending that review the corridor previously identified for a rail link to Navan should be protected from development intrusion.

Bus services on the N2 will also be enhanced and a core bus corridor will be provided to Tyrellstown via Ballycoolin from the N2 at Finglas.”

Submission No. 141

Name: Sean Glennon

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- Proposals to terminate the DART Underground tunnel at Pearse station would be a great missed opportunity;
- Suggests serving Christchurch with the Lucan Luas allowing the DART station there to be removed from the plan along with possibly ending the tunnel at Heuston and an above ground station at Docklands;
- Consider a spur from the Northern Line to Dublin Airport;
- In relation to the Phoenix Park tunnel, consider a platform at Heuston with a people mover to the main station;
- Consider a station at the Old Cabra Road to interchange with Swiftway;
- If DART Expansion to Maynooth commences consider a station at Glasnevin;
- BRT should be delivered in the short-term. Airport/Swords should still be developed as Metro north is not due to commence until 2026/2027. Consider an express route via the Port Tunnel;
- Consider alternative orbital transport to the core bus corridor such as developing an orbital Swiftway from Dundrum/Balally to Dardistown Metro stop that could use the M50 in part;
- Consider extending Metro South to Bray and terminating the Green Line Luas at Harcourt or Ranelagh and consider diverting the new tunnel to provide a new underground station at Camden Street, Portobello or Rathmines;
- Ticketing integration should be developed and consider introducing time based tickets to be used across modes;
- Branding needs to be harmonised;
- Consider implementing a congestion charge confined to a similar area as the current HGV ban; and
- Better public transport on orbital routes.

Commentary / Response:

The precise alignment of the DART Underground project remains to be developed and a comprehensive options analysis will be undertaken.

The issue of a public transport connection to Dublin Airport and Swords was dealt with in the Fingal / North Dublin Transport Study which examined 25 different solutions to address these locations and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan. Bus Rapid Transit along this corridor has only ever been intended as an interim measure in advance of a high capacity rail solution, and as such, any CBA comparing the two is unnecessary.

It is not currently intended to provide for a platform at Heuston as part of the Phoenix Park tunnel and passengers will instead choose at an earlier station whether they want the train service that terminates at Heuston or the service that goes through the Phoenix Park Tunnel.

As part of the long-term strategy, proposals for new stations will be assessed on a case-by-case basis. It is not intended to develop any new stations on the Phoenix Park Tunnel line at present. However, if closer examination shows a demand, the Authority will seek to provide a facility.

The assessment work carried out for the “*Dublin Orbital Movement Study Options Report*”, published as a background technical report, evaluated the likely level of public transport demand for orbital movement. That assessment established that the provision of a conventional bus-based orbital system would meet the likely future demands.

The level of transport demand along the SE Luas line in the future would not support the development of a Metro level of service all the way to Bray. A new underground station at St. Stephen’s Green would serve Camden Street sufficiently.

Leap card will continue to develop and add new products and service enhancements.

Transport for Ireland is now the unified brand for all public transport in Ireland.

Congestion charging in Dublin City Centre is not being proposed as part of this draft transport strategy.

Submission No. 142

Name: Damian O’Regan

Organisation: Green Ireland

Summary of Submission Comments, Issues and Recommendations:

- The building of Metro North will result in the destruction of St Stephen’s Green and no true research, reports or expert findings has been studied on this; and
- The draft is full of useless information and untruthful on this issue of St Stephen’s Green.

Commentary / Response:

The previous Metro north project was subject to an Environmental Impact Statement and was granted planning consent by An Bord Pleanala.

The development of the new Metro North project will be subject to a comprehensive environmental assessment process and will be subject to a determination by An Bord Pleanala.

Submission No. 143

Name: Bridie Kildunne

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- While it is necessary to improve and update the rail service on the Maynooth line by electrification, the proposal to close level crossings (in particular Coolmine) is totally unnecessary;
- This would cause major disruption to the community specifically with regard to access to local amenities;
- Suggests improving signalling and developing a new train control centre to manage operations; and
- The return on investment would be greatest by removing the need to build bridges or remove crossings.

Commentary / Response:

The closure of level crossings on the Maynooth Line is being proposed largely on the basis of safety. Level crossings represent a key risk item in the rail network. As the level of service increases on the Maynooth Line following electrification, the level of closures of the road crossing will increase further.

The development of the rail project will include an assessment of whether a replacement road link is required to address traffic movements at Coolmine following the closure of the level crossing. Such a replacement road link would, if provided, be grade-separated from the rail line i.e. it would pass over or under the railway line.

Submission No. 144

Name: Dyanne Purcell

Organisation: Park Rite

Summary of Submission Comments, Issues and Recommendations:

- Support the introduction and expansion of on street parking controls and the assessment for the need for the introduction of parking charges at out of town retail centres;
- There should be a commitment to continued car park access;
- Appropriate and adequate car parking should be retained in the city centre for retail functions and ongoing access should be provided to all multi storey car parks in the city centre;
- Traffic management measures, including the rerouting of any future BRT networks should maintain convenient access for car park customers;
- The NTA should reject the principle that their role is to force citizens out of private cars – it should be to offer better transport options;
- Forcing citizens to stop driving to the city centre only encourages more car usage to out of town retail centres undermining the vibrancy of the city centre; and
- Suggests the establishment of a transport forum representing key stakeholders and requests consultation in the future.

Commentary / Response:

The importance of retail activity to the vitality and economic well-being of Dublin City Centre is fully acknowledged. While the draft transport strategy is a regional transport strategy, it aligns and facilitates the various proposals that have been separately published, jointly with Dublin City Council, in the Dublin City Centre Transport Study. Following on from a separate consultation in relation to that transport study, extensive engagement is on-going in relation to car park access for retail purposes in the City Centre. The objective of that engagement is to ensure an adequate and acceptable level of access to car parks for retail activity.

Access to city centre car parks is being separately addressed in the Dublin City Centre Transport Study and continued access to city centre car parks will be available.

Submission No. 145

Name: Gerard Murphy

Organisation: None

Summary of Submission Comments, Issues and Recommendations:

- The Interconnector should be included in the Strategy;
- Standard gauge railway to Dublin Airport from Clongriffin should be included;
- The completion of the Navan rail line should be included;
- The rail lines to Navan and Dublin Airport should be prioritized over further Luas lines with the exception of BXD; and
- Lucan can be served by rail by opening either of the closed stations on the Sligo and Cork lines.

Commentary / Response:

The interconnector / DART Underground is an intrinsic element of the DART Expansion programme set out in the draft transport strategy.

The issue of a public transport connection to Dublin Airport and Swords was dealt with in the Fingal / North Dublin Transport Study which examined 25 different solutions to address these locations and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan. Bus Rapid Transit along this corridor has only ever been intended as an interim measure in advance of a high capacity rail solution, and as such, any CBA comparing the two is unnecessary.

The extensive transport modelling work done to date indicates that, based on predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only "Large Growth Town I" designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any

additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

The Sligo line does not serve Lucan. Kishogue Station will be opened. The exact timing of the opening will be dependent on the availability of funding to complete the ancillary works to the station and likely passenger usage.

Submission No. 146

Name: David Brennan

Organisation: Dublin City Centre Business Association

Summary of Submission Comments, Issues and Recommendations:

- This is not a direct submission on the Strategy, but on the BRT and urban planning policy generally, which was related to the City Centre Study. The following points are of relevance to the strategy;
- BRT does not need to go through the city centre, but terminate before entering or passing through the centre – i.e. Swords to Busáras, rather than Earlsfort Terrace;
- As an alternative to Clongriffin BRT, feeder buses should serve the DART stations;
- As an alternative to Blanchardstown BRT, feeder buses to the rail line should be implemented;
- If Clongriffin is to proceed, it should terminate at Busáras;
- If Blanchardstown BRT proceeds, it should terminate at Broombridge;
- BRT should use 18m buses;
- A CBA of BRT vs Metro for the Swords Corridor should be undertaken;
- Policy in the city centre study will create a doughnut city;
- Oppose the restriction of car traffic in the city centre; and
- Support Dublin Metro Plan.

Commentary / Response:

This submission provides a report analysing the BRT proposals for Dublin, in addition to a separate report “Averting a Doughnut City”. There are numerous items and issues discussed in the two reports and the commentary below refers to some of those key items.

The most cost effective bus routes are those which carry large numbers in both directions and at all times of the day. As such, the reconfiguration of the conventional bus network to provide for cross-city routes in recent years, known as *Network Direct*, has enabled the bus company to maintain passenger numbers at a viable level during the recession, then grow passenger numbers in more recent years. The same is true of BRT and LRT, hence the construction of Luas Cross City and the extension of the red line to the east into Docklands and the proposed extension to Poolbeg. As such, the most cost effective BRT routes would be those which cross the city and interchange with each other and Luas and DART in the city centre. The approach put forward in this submission, whereby all BRT lines terminate in separate locations and do not penetrate the city is comparable to the situation created on the green line, by

terminating at St. Stephen's Green. This is only now being rectified at significant additional cost and disruption to the city centre.

The issue of a public transport connection to Dublin Airport and Swords was dealt with in the Fingal / North Dublin Transport Study which examined 25 different solutions to address these locations and which recommended the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan. Bus Rapid Transit along this corridor has only ever been intended as an interim measure in advance of a high capacity rail solution, and as such, any CBA comparing the two is unnecessary.

The Draft Transport Strategy and the previous Dublin City Centre Transport Study, will facilitate tens of thousands of extra person trips entering the city centre on a daily basis. They do not seek to ban cars, but to ensure that the significant increase in travel demand can be accommodated on the transport network. Contrary to the views of the DCBA, it is the contention of the NTA, based on the impact of Luas and the QBC network, that the Draft Transport Strategy's implementation will have a significant, permanent and wide-reaching positive impact on the economy of Dublin City Centre.

Submission No. 147

Name: Kevin Kelly

Organisation: Dún Laoghaire Rathdown Chamber of Commerce

Summary of Submission Comments, Issues and Recommendations:

- Little reference to developing transport in DLR, particularly relevant as bus services are reduced;
- Opposed to more tolls on the M50;
- Support better east/west public transport services;
- Strategy is too focussed on Dublin City, with little reference to suburban movement; and
- Recommend a working group be established for all of Dublin.

Commentary / Response:

The Strategy proposes a significant enhancement to the DART service into Dún Laoghaire Rathdown up to a 5-minute frequency. There are two core radial bus routes proposed to serve the area, along the Rock Road and the N11. A core orbital route is also proposed from the west to serve Dún Laoghaire, and another to serve UCD. UCD will also be served by BRT to the city centre and onward to Blanchardstown. Dún Laoghaire Rathdown will benefit from the upgrading of the Green Line Luas in the short-medium term, its upgrading to Metro levels of service, and the extension of Luas services from Bride's Glen to Bray. In summary, under the NTA proposals, Dún Laoghaire Rathdown will be served by two high capacity cross-city radial rail lines, 2 high quality radial bus routes, a BRT, and high quality orbital bus transport. The NTA is of the belief that adequate attention has therefore been given to the County.

While the concerns regarding demand management on the M50 are acknowledged, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively. It should be noted that multi-point tolling does not necessarily mean road users paying more, but that, instead, the toll can be more reflective of the length of journey taken.

In terms of east-west movements, in addition to the development of the orbital bus corridors, the Authority will continue to review travel demand in the south east of the city, particularly as Cherrywood and Sandyford develop.

In relation to the establishment of a working group as proposed, Section 17 of the Dublin Transport Authority Act 2008 provides for an Advisory Council, comprising of a chairperson and 23 ordinary members, to be appointed. The role of the Advisory Council is to make recommendations to, and to advise, the Authority in relation to the performance of its functions. The establishment of the Advisory Council is a matter for the Minister for Transport, Tourism and Sport.

Submission No. 148

Name: Eamon Ryan

Organisation: The Green Party

Summary of Submission Comments, Issues and Recommendations:

- Dramatic increase in the provision of bus, cycling and pedestrian facilities needed;
- Strict concentration of new housing development required;
- Require a directly elected Mayor;
- Strategy needs to be more ambitious;
- Needs a clear budget allocation;
- Orbital bus provision is insufficient;
- Would support a more radical 'safe routes to school' policy;
- Relocate bus stations closer to the M50 to free up inner land for housing;
- Support for a 2nd intercity and regional bus station in the west of the city centre;
- Disappointed with the absence of emissions targets;
- Need LZEV bus fleet, taxis and trucks; and
- Consultation should be extended to include for public meetings.

Commentary / Response:

The Strategy does propose a dramatic increase in sustainable transport facilities over the 20 year period. The Authority supports the concentration of new housing development and this is set out in Chapter 7 clearly. It must be borne in mind, however, that the NTA is not a land use planning authority. The zoning of land for housing is a reserved function of the members of the 7 local authorities making up the Greater Dublin Area. The reorganisation of local government, and the provision for a directly elected mayor is outside the remit of the transport strategy.

The question of budget allocation is a matter for central Government. In accordance with legislative requirements, the Authority will, following the adoption of the strategy, publish a draft Integrated Implementation Plan in 2016, setting out the investment in transport in the GDA for the following six years.

The assessment work carried out for the "*Dublin Outer Orbital Movement Study Options Report*" and the "*Inner Orbital Report*", published as background technical reports, evaluated the likely level of public transport demand for orbital movement. That assessment established that the provision of a bus-based orbital system, along the routes set out in the strategy report, would meet the likely future demands.

This does not preclude further route development, either in the medium-term or during the lifetime of the strategy.

The Authority manages the Green Schools programme and has committed to such a programme in the strategy report. Part of this programme examines the transport environment on the journey to school and, through the Sustainable Transport Measures Grants, and our close work with the local authorities, we are fully committed to enhancing safety for children travelling to school.

While the development of inner suburban and city centre land for housing is an objective of the Authority, a clear business rationale for the movement of the bus garages to the periphery has yet to emerge across the network. This issue is something that will remain under review by the Authority in our role as the regulating body for publicly funded transport in the GDA.

In relation to environmental targets, a new section 8.5 is being added to the draft transport strategy as set out below.

Actions: Insert a new Section 8.5 into the draft transport strategy stating the following:

“8.5 Other Plans and Environmental Policies

Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the “Climate Action and Low Carbon Development Bill 2015”. That Bill, when enacted, will include provision for the preparation of a “national mitigation plan” and a “national adaptation framework”, which will establish energy related targets and actions to be adopted across the transport sector.

The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.”

Submission No. 149

Name: Frank Harrington

Organisation: Meath Federation of Chambers of Commerce and Business Groups

Summary of Submission Comments, Issues and Recommendations:

- Navan bus service unlikely to meet demand up to 2035; and
- Navan rail line should be included.

Commentary / Response:

The extensive transport modelling work done to date indicates that, based on current predicted passenger usage, a rail link from Navan to Pace, with services travelling onwards to Dublin City Centre, is not economically justifiable.

Given that Navan is the only “Large Growth Town I” designated in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 which does not have a rail connection to Dublin, it is proposed that the level of development that will have taken place over the next six years in Navan, together with any additional or revised information on the future development potential of Navan then available, be re-evaluated as part of a review of the final transport strategy which is required to be undertaken within six years of its adoption. Pending that future review it is proposed that the corridor which had previously been identified as the route for a potential rail link to Navan be protected from development intrusion.

Submission No. 150

Name: Patrick King

Organisation: Dublin Chamber of Commerce

Summary of Submission Comments, Issues and Recommendations:

- States that there is a need for the draft strategy to be adopted and for it to be funded;
- Compares investment levels with international comparators and concludes that Dublin has a low level of public capital investment which should be increased;
- Suggests that the Strategy should look beyond a 20 year horizon and instead look to a period of 100 years;
- Refers to the “theme” approach used in the previous draft strategy;
- Highlights the issue of housing location and its impacts on transport patterns and recommends that the Dublin City Development Plan should “meaningfully increase the number of residents in the city centre”;
- Suggests using 2015 passenger travel figures for Dublin Airport;
- Proposes assessment considerations for projects to assess modal shift;
- Concerned in relation to further tolling of the M50 and the issue of orbital movement;
- Recommends 5 year milestones;
- Suggests priority and ranking of projects;
- Concerned in relation to congestion and its impact on competitiveness;
- Supports both new Metro North and DART Underground;
- Suggests proceeding with both the Eastern Bypass and the Leinster Orbital Route;
- In relation to financing of projects, suggests bonds as a funding mechanism. Also should consider operational costs;
- Prioritise modal shift, particularly for commuters;
- Short-term low cost proposals should meet long-term objectives - Continue to improve the bus service, cycle infrastructure and develop incentives for modal shift.

Commentary / Response:

The Authority concurs that investment in public transport in the GDA should compare favourably to other European capitals, and should address the existing deficit in public transport. It will continue to advocate strongly for such investment.

In accordance with the relevant legislation, the maximum period that the Strategy can extend to is

twenty years. However, the Strategy now includes a provision that the main projects are future-proofed for the longer term.

The issue of housing development location is acknowledged as a critical issue related to transport provision. However, the remit of the transport strategy does not extend to land use determination. Nevertheless, the Authority will continue to collaborate with the Regional Assembly and the local authorities in achieving the required level of integration between land use planning and transport provision.

As 2014 represents the last available “full year” figures for Dublin Airport, it is intended to continue using those figures in the draft transport strategy.

The methodology for assessment of transport projects is well defined and is now prescribed centrally by Government. It does include many of the parameters suggested in the submission.

The impacts of congestion on competitiveness are acknowledged. The primary purpose of the draft transport strategy is to address those issues and provide a more efficient and effective transport system. While the concerns regarding demand management on the M50 are acknowledged, it remains the case that congestion is rapidly increasing on this corridor and, without intervention, the road will cease to operate effectively.

In relation to five year milestones, the relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

In relation to the Eastern Bypass, the draft transport strategy states in section 5.8.1 *“[s]imilarly, in the case of the Eastern Bypass, while the section of the route from the Dublin Port Tunnel to the South Port area is included for delivery in this Strategy, the remainder of the route is not proposed for development during the Strategy period. However, the retention of a route corridor for this scheme is recommended, to facilitate the possible future use of the corridor for transport provision.”* Similarly section 5.8.1 addresses the Leinster Orbital Route in a similar manner.

The assessment work carried out for the *“Dublin Outer Orbital Movement Study Options Report”* and the *“Inner Orbital Report”*, published as background technical reports, evaluated the likely level of public transport demand for orbital movement. That assessment established that the provision of a bus-based orbital system, along the routes set out in the strategy report, would meet the likely future demands. The routes chosen represent the optimal balance between journey time and serving the catchment, as evident at the strategic level. As these routes are progressed, and schemes devised to enhance priority at the local level, further analysis of their exact alignments will be undertaken.

The Authority wholly supports the closer integration of land use and transport planning and this is set out in Chapter 7 clearly. It must be borne in mind, however, that the NTA is not a land use planning authority. The zoning of land is a reserved function of the members of the seven local authorities making up the Greater Dublin Area.

In relation to avenues of funding, for the larger projects all funding options, including private financing, will be evaluated.

Short-term proposals, such as Luas Cross City and the reopening of the Phoenix Park Tunnel, are wholly consistent with our long-term objectives. In addition, it is accepted that the improvement of the bus system should be a priority in the short-term, along with improving the cycling infrastructure in urban areas.

Submission No. 151

Name: Lorraine Hennessy

Organisation: The Workers Party, Dublin Mid-West

Summary of Submission Comments, Issues and Recommendations:

- Support Lucan Luas via Ballyfermot and North Clondalkin

Commentary / Response:

The precise alignment has not yet been determined.

Submission No. 152

Name: Peter Walsh

Organisation: Transport Infrastructure Ireland

Summary of Submission Comments, Issues and Recommendations:

- Concerned that congestion levels on the M50 are understated and wishes to ensure that the current conditions are captured appropriately in the Strategy;
- TII consider that Figure 9.5 should be either omitted from the Transport Strategy or it should be enhanced to reflect current and forecast conditions on the M50 mainline and interchanges;
- TII considers that clarification is necessary in relation to the nature of the proposed orbital bus service between Blanchardstown and Tallaght, particularly in relation to its proposed operation along the M50 corridor;
- TII wishes to explore the possible inclusion of the key infrastructure in relation to the N4 / N7 Corridor study within the Transport Strategy and future implementation plans;
- Provision should be made within the Transport Strategy for some of the additional measures identified within the M50/M11/N11 Corridor Study report within the local and regional road network;
- The proposed orbital bus service between Blanchardstown and Tallaght would serve a larger catchment area and achieve improved peak period levels of service if it used the proposed N3-N4 link road as opposed to the M50 between Blanchardstown and Lucan;

- There are a number of key regional road proposals that TII consider of strategic importance to the long term operation of the GDA transport network and therefore merit specific inclusion in the Strategy document;
- Provision should be made within the Transport Strategy to acknowledge the range of studies which are being or may be undertaken for the infrastructural proposals in cooperation with relevant bodies, local authorities and the NTA to address transport constraints in a sustainable manner;
- TII request that consideration be given to changing the wording in Section 5.3.1. from “...will interchange with other rail and bus services in the vicinity of Drumcondra, O’Connell Street and St. Stephen’s Green”;
- TII request that the core radial bus route along Ballymun should be an interim measure until the delivery of new Metro North;
- TII advise that service patterns consisting of Metro running from Bray to Swords and Luas Green Line running from Ranelagh to Finglas to be given detailed consideration;
- TII request that allowance be made in the Strategy for Red Line Capacity Enhancement;
- TII request that allowance be made in the Strategy for replacement and / or refurbishment of existing Luas fleet in order to provide the required services on the expanded network;
- TII request that the following text is added in Section 5.7 of the Strategy: “Liaise with local authorities and TII to improve permeability and accessibility of public transport interchanges”.
- References to the “Spatial Planning and National Roads Guidelines for Planning Authorities” and the EU Directive Trans-European Transport Networks (TENT) Regulation (EU) No 1315/2013 should be included in the background policy section of the Strategy;
- TII requests that the inclusion of the recommendations of M50 Demand Management Report be clarified and that the M50 Demand Management Report be referenced in the Transport Strategy;
- TII request that the Strategy include a stronger focus on area based travel planning leading to behavioural change;
- TII request that consideration be given to revising the text in section 5.8.4 as follows: *“Support the provision of goods vehicle parking facilities at on-line motorway service areas and other appropriate locations within the GDA in accordance with relevant planning guidelines and official service area policy”*; and
- TII recommend that detail on the procedure for the phasing of delivery of the various transport proposals is considered desirable within the Transport Strategy.

Commentary / Response:

In relation to congestion levels on the M50, May 2015 traffic volumes are reported in Section 3.3.6 of the draft transport strategy. Additional information on current congestion issues, such as journey time details, will be inserted into section 3.3.6.

Figure 9.5 in the document shows the change in volume to capacity ratios at the M50 junctions. As the base year is 2011, a revised graphic will be prepared representing current conditions on the motorway.

The Outer Orbital Bus Corridor does see part of that bus service travel along the M50. It is **not** proposed to seek the designation of a lane of the M50 motorway as a bus lane for this corridor. This overall corridor has been identified following extensive assessment of alternative routes.

Because it is not feasible to set out an exhaustive list of non-national road schemes than may be undertaken over the next twenty years, an approach has been adopted of setting out certain types of schemes that will be required, in addition to establishing “Principles of Road Development “ in section 5.8.3. Section 5.8.2 does include the following intention: *“Enhance orbital movement, outside of the*

M50 C-Ring, between the N3, the N4 and N7 national roads, by the widening of existing roads and the development of new road links”.

In relation to the M50/M11/N11 Corridor Study report, section 5.8.1 of the draft transport strategy states: “Capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford).” It is proposed to extend this text to add *“inclusive of ancillary and associated road schemes”*.

The addition of the words “in the vicinity of” will be added to section 5.3.1.

An amendment will be inserted in respect of the radial bus corridor to Ballymun.

Detailed operational service pattern arrangements are outside the ambit of a regional transport strategy.

The provision of additional tram fleet will form part of the relevant light rail projects.

An amendment has been included to address the issue of permeability.

References to the “Spatial Planning and National Roads Guidelines for Planning Authorities” and the “EU Directive Trans-European Transport Networks (TENT) Regulation (EU) No 1315/2013” will be added to section 2 of the draft transport strategy.

The need for demand management on the M50 is clearly identified in the draft transport strategy. It is not proposed to reference specific external reports.

Behavioural changes proposals are referenced in section 5.9 of the document.

In relation to goods vehicle parking, an amendment to the relevant text will be made.

The relevant legislation requires the preparation of an Integrated Implementation Plan following the adoption of a transport strategy (Section 13 of the Dublin Transport Authority Act 2008). That Integrated Implementation Plan is required to set out the investment priorities and proposals for the initial six year period of the Strategy. Subsequent Integrated Implementation Plans will deal with the remaining years of the Strategy.

While the Integrated Implementation Plans will establish the full detail of delivery of the proposals set out in the Strategy, a newly inserted section 5.12 sets out the proposed sequencing of the delivery of key infrastructure elements of the Strategy, which will guide the development of those Integrated Implementation Plans.

Action: Insert additional journey time and congestion information in relation to the M50 into section 3.3.6.

Action: Insert revised graphic in relation to the M50 to replace current Figure 9.5.

Action: At the end of the sixth bullet point in section 5.8.1 insert *“inclusive of ancillary and associated road schemes”*.

Action: In section 5.3.1, replace “at Drumcondra” with “in the vicinity of Drumcondra”.

Action: At the end of the bullet point list in section 5.5.1, insert “In the case of the “Ballymun – Phibsboro” corridor, this may be amended in conjunction with the development of new Metro North.”

Action: Insert references to the “Spatial Planning and National Roads Guidelines for Planning Authorities” and the “EU Directive Trans-European Transport Networks (TENT) Regulation (EU) No 1315/2013” in section 2 of the draft transport strategy.

Action: At the end of the sixth bullet point in section 5.8.4 insert “in accordance with relevant planning guidelines and official service area policy.”

Submission No.153

Name: David Franks

Organisation: Irish Rail

Summary of Submission Comments, Issues and Recommendations:

- Supports the “broad thrust” of the Strategy;
- Notes and supports the delivery of the Phoenix Park Tunnel and the Train Control Centre;
- Confirms the importance of the DART Expansion Project but expresses concern in relation to the potential of a prolonged deferral of the project;
- Suggests a strategic review to identify which line upgrade elements of the DART Expansion Programme would be most advantageous;
- Notes and supports the development of additional train stations (where economically justified);
- Welcomes the replacement/refurbishment of the DART fleet and states that a commitment to a programme for the delivery of the DART Expansion Programme is necessary to plan optimal rolling stock requirements;
- Welcomes the emphasis on demand management measures and notes that it is essential that there is on-going implementation of integrated land-use policies;
- Supports park and ride policy and recommends a study to determine locations and feasibility for development, plus recommends all day parking charges on local streets adjacent to stations;
- Proposes the development of a link from the Northern Rail line to Dublin Airport and recommends, at a minimum, that its corridor should be protected;
- Notes position on Navan Rail Line; and
- Suggests that the Strategy should support the outcome of the Government's planned review of rail freight transport.

Commentary / Response:

The submission states Irish Rail's support for the various heavy rail projects included in the draft transport strategy.

In relation to the DART Expansion Programme, the draft transport strategy fully acknowledges the importance of this project, stating it to be a “cornerstone project of the Strategy”. Similarly, the Government's recent Capital Plan “Building on Recovery” states:

“The first phase of a multi-phase DART expansion programme will also begin, with the extension of the DART line to Balbriggan and with design and planning to progress for expansion of DART services to

Maynooth in the west and Hazelhatch in the southwest. The Dart Underground Project, which remains a key element of integrated transport for the GDA over the longer term, will be redesigned to provide a lower cost technical solution, whilst retaining the required rail connectivity.” As part of the development of the DART Expansion Programme an analysis of the optimal sequencing of the various elements will be undertaken.

In relation to fleet acquisition / refurbishment, the timetable for this will be developed as part of the overall DART Expansion Programme, and it will be addressed in more detail in the Integrated Implementation Plans.

Implementation of the park and ride policy will require extensive site analysis and optimisation of locations. In relation to the issue of charges on local roads, an additional provision will be added to the draft transport strategy stating *“In addition, implement, where appropriate, a suitable charging structure on local roads adjacent to park and ride facilities to discourage commuters from parking on such roads.”*

The background to the new Metro North project is that a major study was undertaken to evaluate the various competing projects that had been proposed to serve this corridor, in particular the key destination of Dublin Airport. That Fingal / North Dublin Transport Study examined 25 different solutions to address the long-term public transport demands along the Swords / Dublin Airport to City Centre corridor. After an initial assessment exercise, a shortlist of six projects was identified for detailed evaluation, and this formed the second phase of the study.

The outcome of that detailed analysis was a comprehensive report which recommended the development of the new Metro North project. The Government have now adopted that recommendation and included the development of the new Metro North Project as part of the recent national Capital Plan.

A rail connection to the Airport was considered as part of the analysis undertaken, but this was not the selected.

In the light of the analysis undertaken, and the Government's subsequent decision, there is no basis for seeking to reserve the corridor identified by Irish Rail for their proposal.

In relation to rail freight, section 5.8.4 now includes the following commitment: *“The Authority will also take account of any relevant findings and recommendations emerging from the proposed national sustainable and competitive freight policy and the review of rail policy which the Department of Transport, Tourism and Sport has committed to undertake.”*

Action: Add at the end of the last bullet point in section 5.10 *“In addition, implement, where appropriate, a suitable charging structure on local roads adjacent to park and ride facilities to discourage commuters from parking on such roads.”*

Submission No. 154

Name: Owen Keegan

Organisation: Dublin City Council

Summary of Submission Comments, Issues and Recommendations:

- DCC welcomes the draft strategy
- Dublin City suffers from the lack of priority given to sustainable travel in the surrounding counties
- NTA should ensure consistency of approach across the region, but the strategy has not gone far enough in this regard
- More detailed direction and guidance on how the strategy should be incorporated into Development Plans to ensure consistency is required
- Timely delivery of public transport is crucial in delivering modal shift
- Strategy needs to reassert the movement hierarchy
- Focus should be on reliability as well as frequency of public transport and on interchange
- Strategy should explore bikes on buses and trains
- Approach to walking is not as fully worked out as other modes
- No specific pedestrian projects identified or guidance on footpath standards
- Car parking requirements are welcomed, however the locations for restrictive standards are not identified
- Little direction regarding car parking along boundary areas with similar levels of accessibility – e.g. Naas Road
- Residential car parking has not been addressed, particularly in view of transport projects that may impact on parking used by residents for car storage
- Strategy should promote car sharing and car clubs
- Strategy does not follow through with the mechanism to support Local Authorities in undertaking behavioural change – specific funding stream is required
- Proposed Park and Rides at Lucan and Clondalkin may be too close to the M50
- Freight management sections should be further developed
- Implementation needs to be expedited and funding made available to local authorities to do so
- DCC would welcome further comment on the City Development Plan
- Welcome rail proposals and the importance of rail link to the Airport set out
- Welcome bus measures, cycle measures and will work with the NTA on cycling initiatives
- Note the potential inconsistency between the Strategy and DCC Development Plan re the Eastern Bypass
- Support the maintenance of the primary function of the Dublin Port Tunnel
- Malahide road improvement and other schemes in the DCC Development Plan should be listed in the National Roads section
- DCC welcomes and supports the measures in Chapters 6 and 7
- There is a requirement for the City Centre Transport Study to reflect the strategy, in particular the potential move away from the Swords BRT

Commentary / Response:

Comments of support are noted. The Authority, through the transport strategy and in our statutory role in regional and local planning, is seeking consistency in transport policy across the Greater Dublin Area. While national and regional policy must be broadly adhered to at the local level, the Authority must be cognisant, at all times, of the mandate provided by the Planning Acts to policy-making and decision-

making at the local level to the elected members of each Local Authority. The status of the transport strategy as provided for in the Planning Acts will deliver a stronger mandate in this regard to the Authority and it is intended to act on this as appropriate. The Authority will continue to engage constructively with each Local Authority throughout the making of Development Plans and Local Area Plans to ensure that the commitment of Dublin City Council to sustainable travel is reflected in other areas to the maximum extent possible, while cognisant of the stark contrast in geography, population density and transport provision which pertains across the Greater Dublin Area.

While the strategy does not explicitly set out the movement hierarchy, it is clear from the content of the report – transport shortcomings, patterns and trends – that the underlying message reflects the primacy of walking, cycling and public transport over the private car.

The strategy is focussed on the delivery of a reliable and frequent public transport system and one in which the interchange penalty is minimised.

The issue of the carriage of bicycles on public transport is an operational issue which can be dealt with separately on a mode-by-mode basis.

As a regional level transport strategy, it would not be appropriate to detail pedestrian schemes. These are very small in nature, and too numerous to list and map. As such, the approach to walking, while general, is appropriate to a multi-modal regional transport strategy, and detailed plans are more appropriately undertaken by local authorities. It was agreed however that a commitment to closer engagement with Local Authorities was appropriate to the strategy, and to that end, the following text had been added into section 5.7.

“Develop, in collaboration with the local authorities, a strategic pedestrian network plan, encompassing the main urban centres of the region, which will identify the key pedestrian linkages in those areas;”

There are a number of comments related to car parking. Similar to the first part of our response, the Authority does not have the power to set car parking standards. This is a reserved function of the members of the Local Authorities in their Development Plans. The Authority is not in a position, legislatively, to prescribe car parking standards for various locations throughout the region. As such, we will seek the maintenance of the application of maximum standards in the GDA, and will seek reduced parking via Local Area Plans, SDZ Planning Schemes and planning applications at both origins and destinations, where appropriate, including interface areas between neighbouring Local Authorities.

In relation to transport projects affecting residential car storage, particularly in inner city areas, the Authority acknowledge this issue and will seek resolution on a case-by-case basis. It is not felt appropriate to deal with this issue at the regional level. It was agreed that car clubs, car-pooling and car sharing should be promoted and, as such, the following change was made to section 5.9:

- Replace “Car club schemes and car sharing” with “Car club schemes, car-pooling and car sharing”.

There are a number of statements made related to behavioural change. The identification and funding of such programmes to be implemented by Local Authorities is a matter for those authorities. The National Transport Authority is fully committed, both in the strategy and on the ground, to 3 major behavioural change programmes on a national basis – Green Schools Travel, Smarter Travel Workplaces

and Smarter Travel Campuses. The Authority has, from time to time, engaged in area-based programmes with Local Authorities, and will continue to do so, where feasible and where funding is available.

The Park and Ride at Clondalkin is the existing Red Cow Luas facility. Strategic Park and Ride facilities are most appropriately located where the National Road network meets a high-capacity rail line. As such, Liffey Valley was chosen as the most suitable site for such a facility serving the N/M4 Corridor via the Lucan Luas.

In relation to freight, the language in that section has been updated to reflect the need for greater commitment in that regard.

In terms of funding, the Authority consistently seeks additional funding from central Government in order to fulfil our legislative functions, many of which are shared with the Local Authorities. The Authority will continue to strive to maximise funding available for sustainable transport measures.

The Malahide Road is a regional road and, as such, it would not be appropriate to list it under National Road schemes.

The Authority notes the comments in relation to the City Development Plan and City Centre Transport Study.

Submission no. 155 – Michael McElgunn, An Garda Síochána

Summary

- Submission summarises the role of An Garda Síochána in strategic traffic plans, cycling, SPSV regulation and taxi ranks
- It notes the value of the proposal to integrate SPSV into overall public transport network
- Welcomes increased Luas capacity, cycling infrastructure expansion and additional pedestrian schemes, but request consideration of the need for vehicular road space, in particular for bus
- States commitment to continued cooperation

Response

The Authority notes the supportive comments and will continue to work closely with An Garda Síochána in all relevant matters when implementing the Strategy.

Part C: Review of Submissions related to Strategic Environmental Assessment (SEA) Report and Appropriate Assessment (AA) Report

SEA and AA Report on Submissions

RECEIVED ON THE

**SEA ENVIRONMENTAL REPORT
AND
NATURA IMPACT REPORT**

FOR THE

**DRAFT TRANSPORT STRATEGY
FOR THE
GREATER DUBLIN AREA
2016-2035**

for: National Transport Authority

Dún Scéine,
Iveagh Court,
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DECEMBER 2015

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Introduction

This report responds to submissions (3 no.) which were made on the Strategic Environmental Assessment (SEA) Environmental Report and Appropriate Assessment (AA) Natura Impact Report for the Draft Transport Strategy for the Greater Dublin Area 2016-2035 while these documents were on public display from October 15th to November 13th 2015.

Responses are provided to the issues raised in the submissions and updates to the Transport Strategy, SEA Environmental Report and AA Natura Impact Report are identified where relevant.

Further changes to the Transport Strategy which are made on foot of other submissions not relating to the SEA and AA documents will be considered by the SEA and AA processes for environmental consequences.

Responses to Submissions and Updates Arising

Environmental Protection Agency Submission

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
1	<p>Specific Comments on the Strategy to be considered</p> <p>We welcome the aims of the Strategy which include proposals to increase the use, interconnectivity and efficiency of public transport alternatives within the Greater Dublin Area.</p> <p>The Strategy provides a useful overview of the key transportation aspects covered under the Strategy (Road Network, Bus, Heavy Rail, Light Rail, Cycling Network, Pedestrian Network, Small Public Service Vehicles and Freight Services) as well as highlighting the key transportation related projects currently being considered, underway or achieved to date.</p> <p>The objective to reduce private vehicle transportation journeys in favour of public transport options (rail, bus, cycling, pedestrian) aligns with the Agency's goal to seek improvements in air quality in urban areas and reduced greenhouse gas emissions. The Strategy should also promote and support the achievement of zero or low carbon emission transport options where possible. The public transport fleet, and in particular buses, should move towards cleaner fuels such as gas in order to reduce the contribution from the bus fleet to atmospheric particulate levels across the Dublin City area.</p> <p>Realisation of reduction in private car based transport and increase in public transport use and support for walking and cycling infrastructure will result in reduced emissions to atmosphere from the transport sector and improved air quality across the Greater Dublin region. On this basis, the EPA is supportive of the specific measures proposed in the Strategy which promote a reduction in private car use and an increase in use of public transport.</p>	Noted.	None.
2	<p>The EPA highlights the following issues which should be considered as part of the SEA process and should be reflected in commitments in the Strategy:</p> <p>a) Emissions from transportation are a significant contributor to air pollution across Ireland and particularly in urban areas. The latest inventory report for Ireland (for 2013) indicates that transport accounts for more than 54 % of all emissions of NOX (oxides of nitrogen), with road transport contributing 45 % in its own right. Transport is also a significant contributor to emissions of carbon monoxide (54 %), volatile organic compounds (7.6 %) and particulate matter (PM2.5 12 % and PM10 9 %).</p> <p>b) The revised EU National Emissions Ceiling Directive will place further downward pressure on pollutant emissions in Ireland, and NOX presents a particularly significant compliance challenge. Reductions in emissions from the transport sector will be required in order to meet the proposed NOX emissions ceiling for 2030. Strategies such as the Dublin</p>	<p>Baseline information on air quality and emissions to air, including information taken from the EPA's publications Air Quality in Ireland 2013 (2014) and Ireland's Greenhouse Gas Emission Projections 2014-2035 (2015), is provided in Section 4.3 of the SEA Environmental Report and issues in relation to air quality and emissions have been considered in the assessment of Transport Strategy provisions.</p> <p>It is proposed to add a new Section 8.6 to the Strategy and expand one of the measures included in Table 9.2 of the SEA Environmental Report (the measures in this table have been integrated into the Strategy through the commitment provided at Section 8.5 of the Strategy).</p>	<p>To add a new section to the Strategy as follows:</p> <p><i>8.6 Other Plans and Environmental Policies</i> <i>Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the "Climate Action and Low Carbon Development Bill 2015".</i></p>

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	<p>Transportation Strategy will play a key role in reducing NOx emissions from the transport sector.</p> <p>c) Impacts on NOx concentrations in the atmosphere from any traffic management measures/changes should be determined in advance (noting that NOx limits were previously in 2009 in Dublin city centre).</p> <p>d) Consideration should be given to the PM2.5 NERT (National Exposure Reduction Target) as specified under the EU CAFE Directive, which requires a 10% reduction in ambient PM2.5 levels by 2020. Reductions in pollutant loadings from transport sector will be an important contributor to achieving the NERT reductions.</p> <p>e) The DECLG is proposing to develop a Clean Air Strategy for Ireland. Whilst the development of this strategy will only commence in 2016, it may nonetheless be worth noting within the SEA process and committing to incorporating into the Strategy upon its adoption.</p>		<p><i>That Bill, when enacted, will include provision for the preparation of a "national mitigation plan" and a "national adaptation framework", which will establish energy related targets and actions to be adopted across the transport sector.</i></p> <p><i>The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.</i></p> <p>To reference the following in Appendix I Relationship with Legislation and Other Plans and Programmes: Climate Action and Low Carbon Development Bill 2015; national mitigation plan; national adaptation framework; and Climate Action and Low Carbon Development Bill.</p> <p>To expand the measure 'Air and Energy' detailed in Table 9.2 of the SEA Environmental Report, which the Strategy commits to implement, as follows:</p> <p><i>Air and Energy</i> <i>To contribute towards: compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage. This includes: contributions towards meeting legislative targets contained in the CAFE Directive as transposed</i></p>

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
			<i>into Irish legislation by the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011); principles of the Convention on Long Range Transport of Air Pollution; and incorporation of the relevant targets and actions arising from the Climate Action and Low Carbon Development Bill 2015 and the national mitigation and adaptation plans and related policies in the area of transport energy.</i>
3	<p>Additional Plans/Programmes to Consider</p> <p>We recommend that the Strategy take into account and reflect the commitments being considered in relation to the National (Climate Change) Mitigation Plan in particular in relation the transport sector. A national (Climate Change) Adaptation Plan is also being prepared and should also be taken into account and incorporated as appropriate.</p> <p>This Plan seeks to reduce greenhouse gas emissions in a number of key sectors, one of which is the transportation sector. When considering the various transportation options and associated projects which may arise from this Strategy's implementation, close alignment with the National (Climate) Mitigation plan is required. The Strategy should clarify the status of the projects referenced and also describe whether projects which have not been subject to EIA are also considered under this Strategy.</p> <p>Other key level "plans/programmes" to be aware of include the National Policy Framework for Alternative Fuel Infrastructure and the Eastern Catchment Flood Risk Assessment and Management Study.</p>	<p>See response and update under point 2 above.</p> <p>To include reference to the following in Appendix I of the SEA Environmental Report: Climate Action and Low Carbon Development Bill 2015, which, when enacted, will include provision for the preparation of a national mitigation plan and a national adaptation framework; and National Policy Framework for Alternative Fuel Infrastructure.</p> <p>The outputs of the CFRAMS have been integrated into the Transport Strategy through a measure entitled "Flood Risk Management Guidelines" which is included on Table 9.2 of the SEA Environmental Report (the measures in this table have been integrated into the Strategy through the commitment provided at Section 8.5 of the Strategy).</p> <p>The SEA Environmental Report Tables 3.1 to 3.4 clarifies the status of the different projects referred to.</p>	<p>See response and update under point 2 above.</p> <p>To include reference to the following in Appendix I of the SEA Environmental Report: <i>Climate Action and Low Carbon Development Bill 2015, which, when enacted, will include provision for the preparation of a national mitigation plan and a national adaptation framework; and National Policy Framework for Alternative Fuel Infrastructure.</i></p>
4	<p>SEA Alternatives</p> <p>While the SEA describes a number of high level alternatives considered, it may be useful to also consider a more tiered approach to alternatives in terms of assessing the potential to implement the various transportation options within each 'corridor area' as shown in Figure 3.6 GDA Corridors. This tiered alternatives assessment approach could look at the viability of all transportation options within each corridor area to determine which transportation options minimise potential environmental impacts while also fulfilling the aims of the Strategy.</p>	<p>The tiered approach taken in relation to the consideration of alternatives within corridors will be documented within the SEA Environmental Report.</p>	<p>To include a new Section in the SEA Environmental Report <i>Section 7.5 Alternatives by Corridor.</i></p>
5	<p>Using a '<i>multi-criteria assessment approach</i>' in terms of technical, social, environmental and economic considerations would provide a framework which would highlight options which may be of greater benefit but not currently viable given economic cost, or technological or social acceptance and other relevant aspects.</p>	<p>The SEA and AA processes that have been undertaken alongside the Strategy have enabled compliance with the relevant legislation. Multi-criteria assessment is not provided for by this legislation.</p>	<p>None.</p>
6	<p>Environmental considerations should also be integrated into <i>Section 4.2 Options Appraisal by Corridor</i> to identify potential significant environmental effects. Suggested key mitigation measures should be highlighted in order to address or minimise potential for adverse</p>	<p>Additional information on alternatives will be provided in the SEA Environmental Report – see response under point no. 4 above.</p>	<p>SEA Environmental Report to be updated – see point no. 4 above.</p>

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	environmental effects. It would also be useful if environmental sensitivity summary tables were prepared for each corridor area to highlight the particular sensitivities to be considered and protected within each area.		
7	<p>Chapter 7 – Land Use Integration and Behavioral Change highlights the need to coordinate and collaborate with local authorities and other key stakeholders to implement the Strategy. Integration and protection of green infrastructure corridor integrity between adjacent local authority areas needs to be maintained and supported, in terms of the services that they provide (ecological corridors, cycle and walking routes, amenity areas, urban carbon sinks, flood attenuation etc.).</p> <p>Recent announcements in relation to restrictions of bicycles on commuter trains may potentially lead to increased private car usage which would conflict with the aims of the Strategy. It may be more appropriate, in the context of supporting low carbon and zero carbon options to consider supporting the provision of appropriate storage facilities on-board commuter trains for bicycles.</p>	Comment relates to Strategy report	None.
8	In Chapter 8 Environmental Protection and Management, while the Strategy highlights that the protection of environmental sensitivities will be carried out in lower level plans and projects, a strong commitment, in this regard, is also required in this Strategy. The Strategy should consider including a commitment that projects arising out of the implementation of this strategy will be carried out in accordance with the various environmental regulations and EU Directives including SEA, EIA, AA, FRA etc.	The Strategy will be updated to include the commitment to implement the measures detailed in Table 9.2 of the SEA Environmental Report, including those in relation to the cited Directives.	<p>To add a new section 8.5 to the Strategy as follows:</p> <p><i>8.5 Other SEA Recommendations In implementing the Strategy, the Authority will ensure that the measures included in Table 9.2 of the SEA Environmental Report are complied with.</i></p>
9	<p>Specific Comments on the SEA ER to be considered</p> <p>We note in Section 3.3 – Schemes within the Strategy, the various transport related projects (Tables 3.1 through Table 3.4) which have been achieved, planned or considered in future strategies. It would also be useful to consider highlighting key pedestrian/cycle routes such as the Dublin – Galway Green Route, Sutton – Sandymount Pedestrian/Cycle route.</p>	The SEA has taken into account the GDA Cycle Network Plan which has been integrated into the Strategy. The Greater Dublin Area Cycle Network Plan incorporates various provisions for various projects which may (or may not) occur, including a greenway route which adjoins what is referred to as a “Dublin to Galway cycleway” at the Royal Canal. It is noted that a recent government decision pauses progression of the western part of the “Dublin to Galway cycleway” in all of counties Galway and Roscommon. Any potential adverse effects which may arise as a result of the Strategy – alone or in-combination with the GDA Cycle Network Plan – will be mitigated by the measures which have been integrated into the Strategy.	None
10	<p>Existing Environment</p> <p>Air Quality</p> <p>The Agency has published Air Quality in Ireland 2014 (EPA, 2015), which should be reflected in terms of updating the baseline air quality. This can be reviewed at: http://www.epa.ie/pubs/reports/air/quality/#.VkHYU9CvIaQ. In addition, there is merit in including a reference to the ongoing ambient air quality monitoring carried out by the EPA. This is also available at http://www.epa.ie/air/quality/monitor/#.VkHYy9CvIaQ</p>	<p>Baseline information from the EPA’s publication Air Quality in Ireland 2013 (2014) is provided in Section 4.3 of the SEA Environmental Report. This information will be updated to take account of the EPA’s more recent 2015 publication Air Quality in Ireland 2014.</p> <p>Section 4.2 will also be updated to reference the ongoing ambient air quality monitoring carried out by the EPA.</p>	Baseline information from the EPA’s publication Air Quality in Ireland 2013 (2014) provided in Section 4.3 of the SEA Environmental Report will be updated to take account of the EPA’s more recent 2015 publication Air Quality in Ireland 2014.

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
			Section 4.2 will also be updated to reference the ongoing ambient air quality monitoring carried out by the EPA.
11	Landscape It would be useful to include a reference to the National Landscape Strategy (DECLG, 2015), in terms of integrating areas of significant landscape character in implementing the Strategy.	The 'National Landscape Strategy' included in Table 9.2 of the SEA Environmental Report covers this issue (the measures in this table have been integrated into the Strategy through the commitment provided at Section 8.5 of the Strategy).	None.
10	<p>Assessment of environmental effects We note the alternatives provided in <i>Section 6 – Description of Alternatives</i>. It would be useful to also consider the extent to which the various transportation options being considered are to be provided for in each alternative.</p> <p>There would also be merit in assessing the viability and potential environmental conflicts of implementing the various transportation options in the various route corridors of the GDA. This should assist in identifying particular options which are more viable within the lifetime of the Strategy etc. Conflicts with environmental sensitivities should also be identified and where adverse effects identified they should be appropriately mitigated.</p> <p>It would also be useful to describe (in the SEA and the Strategy) whether the phased roll out of projects outlined in Section 3.3 of the SEA is to be achieved over the lifetime of the Strategy or whether particular projects are proposed for implementation in future strategies.</p> <p>In assessing the various alternatives, it would be useful to clarify what transport options have the greatest potential to impact on specific environmental sensitivities such significant construction or maintenance or operational activities which would be required. Clear commitments/mitigation measures should be provided to ensure environmental considerations and related protection requirements are appropriately and adequately catered for.</p> <p>The potential impacts of cycle and pedestrian impacts would be perhaps different from expanded rail or road infrastructure which should also be highlighted. Including a summary of the various transportation options proposed and key environmental positives and negatives would be useful to consider.</p>	<p>Additional information on alternatives will be provided in the SEA Environmental Report – see response under point no. 4 above.</p> <p>Various mitigation has been included in the Strategy. The integration of mitigation will be strengthened by the addition of Section 8.5 into the Strategy.</p>	SEA Environmental Report and Strategy to be updated – see points no. 4 and 8 above.
11	Mitigation Measures The Strategy should include a commitment to take into account the key environmental legislation, plans and programmes, as described in Appendix I, in implementing the Strategy.	Noted.	None.
12	Monitoring It would be useful to link the monitoring of the Strategy and the SEA related monitoring processes. Reviews of the Strategy over its lifetime should also be accompanied and informed by updated monitoring / baseline environmental information to determine how well the Strategy is being implemented, taking into account environmental considerations.	Noted. As detailed in Section 10 of the SEA Environmental Report a stand-alone Monitoring Report on the significant environmental effects of implementing the Strategy will be prepared on in advance of the review of the Strategy. . This report will address the indicators set out in the Environmental Report which relate to baseline environmental information.	None.
13	Future Amendments to the Draft Strategy Where amendments to the Strategy are proposed, these should be screened for likely	All amendments to the strategy will be screened for likely significant effects.	None.

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	significant effects in accordance with the criteria as set out in Schedule 1 of the SEA Regulations (S.I. No. 435 of 2004) and should be subject to the same method of assessment applied in the "environmental assessment" of the Draft Strategy.		
14	SEA Statement – "Information on the Decision" Following adoption of the Strategy, an SEA Statement, should summarise the following: <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Strategy; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Strategy; • The reasons for choosing the Strategy adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Strategy. 	An SEA Statement will be prepared following adoption of the Strategy.	None.
15	A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.	A copy of the SEA Statement will be sent to any environmental authorities consulted during the SEA process.	None.

Department of Arts, Heritage and the Gaeltacht Submission

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
1	<p>Strategy</p> <p>This strategy includes road, rail and cycle networks. The most obvious potential impact on the natural heritage noted by this Department as a result of implementing this strategy is that of electrifying the rail line to Drogheda. This would involve new overhead electric cables crossing above the railway embankments at both Malahide and Rogerstown Estuaries which are Natura 2000 sites. Therefore there is potential for bird mortality from collisions with the electric cables when birds fly between the inner and outer estuaries.</p> <p>Therefore the statement in section 8.4.1 is welcome, stating that "<i>No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions</i></p>	Noted.	None

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	<i>(disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning, or from any other effects shall be permitted on the basis of this Strategy (either individually or in combination with other plans or projects.)</i> ^[1] . It is noted that this was added as a result of SEA and AA.		
2	The GDA Cycle Network Plan has been incorporated into this Strategy and this is further discussed in section 5.6 of the Strategy. This Department notes that one of the challenges identified for transport in the GDA is that the environment is protected and enhanced. It is the view of this Department that in order to protect and enhance the environment some routes may need to be altered.	<p>With regard to the selection of certain routes it is noted that lower tier planning and environmental assessment will be undertaken for the Strategy. Various provisions in the Strategy will be followed in this regard and Section 8.3 of the Strategy outlines the Corridor and Route Selection Process which will be undertaken for relevant new infrastructure.</p> <p>In order to emphasise the fact that routes referred to in the strategy are indicative subject to more detailed assessment it is proposed to add clarifying text to the Strategy.</p>	<p>To add the following text to the Strategy at Section 5 'The 2035 Transport Network', subsection 5.1 'Introduction':</p> <p><i>"The alignments and details of proposed public transport projects set out in this Chapter are indicative only and are subject to further development as the design and planning processes for individual projects progress. Accordingly, some of the details of the individual proposals will be subject to amendment as this design development work is undertaken. The design and planning of individual projects will be carried out in accordance with prevailing legislation relating to environmental assessment and public consultation. In relation to heavy rail and light rail infrastructure projects, the design of these projects will future-proof their ability to serve the needs of the region for the long term....."</i></p>
3	<p>Apart from the concerns mentioned above with regard to electrification of the rail, this Dept. has concerns with the potential impact on biodiversity from cycle routes, including routes with lighting, along ecological corridors as envisaged under Article 10 of the EC Habitats Directive. Other proposals in the strategy, such as a proposed new bridge over the river Dodder and a new distributor road network to be developed to service lands at Kiltiernan and Glenamuck, could also result in loss of biodiversity.</p> <p>The EU has set a target to halt the loss of biodiversity by 2020. Ireland's National Biodiversity Plan 2011-2016 has a target to halt the loss of protected habitats and species by 2016 and to reduce biodiversity loss in the wider countryside by 2016 with substantial recovery by 2020. As well as complying with the National Biodiversity Plan, proposed routes will need to be in compliance with the relevant legislation and relevant County Development Plans and County Biodiversity</p>	<p>Noted. The strategy, including route selection, will be implemented in compliance with, inter alia, relevant legislation and the various measures within and through (with reference to Table 9.2 of the SEA Environmental Report) Section 8 of the Strategy.</p> <p>Section 8.1 of the Strategy sets out the regulatory framework for environmental protection and management and Section 8.2 of the Strategy identifies the various sensitivities and designations which must be taken into account by lower levels of decision making and environmental assessment.</p> <p>Lower tier plans and projects will comply with the various mitigation measures which have been integrated into the Strategy including the measure entitled "Protection of Biodiversity including Natura 2000 Network" which will be updated to specifically include the plans cited.</p> <p>Furthermore such proposed routes will need to be in compliance with the relevant legislation and relevant County</p>	<p>To expand the measure 'Protection of Biodiversity including Natura 2000 Network' detailed in Table 9.2 of the SEA Environmental Report, which the Strategy commits to implement, as follows:</p> <p>...</p> <p>To comply with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including the following and any updated/superseding documents):</p> <p>....</p> <ul style="list-style-type: none"> • Biodiversity Plans and guidelines, including Actions for Biodiversity 2011-2016: Ireland's 2nd National Biodiversity Plan (including any superseding version of same), <i>County Biodiversity Action Plans and relevant measures contained in statutory land use plans.</i> <p>....</p>

¹ Note that the following footnote is part of this commitment: Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available; b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	Action Plans.	Development Plans [which are subject to lower tier SEA and AA] and County Biodiversity Action Plans as appropriate, while resultant relevant projects will be subject to EIA and AA. High-level assessments of a general strategy that may be implemented using a wide range of, as yet undecided, potential projects or options depart from the consideration of alternatives and enter the realm of speculation – because of the very large number of potential combinations and permutations that could occur and inter-act. For this reason the principle of subsidiarity applies – whereby lower tier assessments and the lower tier County and Local Plans can carry out the requisite consideration of more specific alternatives as well as interactions and cumulative effects.	
4	Section 8.2 of the Strategy refers to chapter 7 and appendix B of the SEA but appendix B appears to be missing from the SEA.	This is an error and will be corrected.	To update Section 8.2 of the Strategy as follows: 8.2 Lower-level Decision Making Lower levels of decision making and environmental assessment should consider the sensitivities identified in Section 4–Chapter 7 and Appendix B of the SEA Environmental Report, including the following
5	NIS The GDA Cycle Network Plan has been incorporated into this Strategy and it is stated in section 2.3.2 of the NIS that the Plan has already been subject to appropriate assessment. However it is the opinion of this Department that it still needs to be assessed as part of this strategy as there may be cumulative effects. One such example is that of proposed cycleways and walkways across and around Malahide and Rogerstown Estuaries which will cumulatively impact with the electrification proposed in the strategy.	The NIR does consider the provisions of the GDA Cycle Network Plan. The wording of the NIR will be revised to clarify this. In relation to the potential for cumulative effects at Malahide and Rogerstown Estuaries, the assessment of impacts on these sites will specifically address this issue. The cumulative effects and interactions of lower tier assessments will also need to consider the full spectrum of cumulative and interacting effects – such as the potential for the provision of electrification to avoid the continuation of noise and air pollution from diesel trains and / or the effects of increased recreation by walking and cycling compared to current levels of car-borne activities in these areas.	Reword text in Section 2.3.2 of NIR referring to the GDA Cycle Network Plan as follows: Although the plan has already been subject to Appropriate Assessment², the provisions of the plan are further considered in this report to ensure that the potential cumulative effects of the Strategy are addressed. Table 2.6 of the Natura Impact Report has been updated to highlight the risk of cumulative impacts at both Malahide and Rogerstown Estuaries due to DART Expansion and GDA Cycle Network Plan. Parts of Section 3.2 of the Natura Impact Report have been updated (see point no. 6 below) to highlight the potential for cumulative effects.
6	It is stated in section 3.2.1.2 that the significance of disturbance on Natura 2000 sites will be assessed by lower level appropriate assessment (AA) to be undertaken on the relevant scheme. It is similarly stated in section 3.2.1.4 that the significance of the collision risk from the electrification of the rail structure will be assessed by lower level AA to be undertaken on the relevant scheme. However this Department is of	Disturbance effects on sensitive features of Natura 2000 sites due to implementation of the strategy are identified in Section 3.2.1.2. Due to the high level and strategic nature of the strategy it is not feasible to determine with confidence the level or significance of such disturbance effects, particularly in the absence of detailed design information on projects that are in the early planning stages. The assessment of impacts provided in the NIR informs various precautionary high level	To provide more information on this issue by adding new text to the Natura Impact Report at: <ul style="list-style-type: none"> • Section 3.2.1.2 “Loss / Reduction of Habitat Area” • Section 3.2.1.3 “Disturbance to Key Species” • Section 3.2.1.4 “Reduction in Species Density”

² National Transport Authority (2013). Greater Dublin Area Cycle Network. Appropriate Assessment Screening Report Natura Impact Statement.

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	the view that this issue needs to be assessed for this Strategy as pushing it down to project level will not adequately address the impacts of the whole strategy.	<p>mitigation measures that have been incorporated into the Strategy.</p> <p>Furthermore such proposed routes will need to be in compliance with the relevant legislation and relevant County Development Plans [which are subject to lower tier SEA and AA] and County Biodiversity Action Plans as appropriate while resultant relevant projects will be subject to EIA and AA.</p> <p>It is acknowledged that there is a reliance on lower level assessment to ensure that the identified impacts at the strategy level do not give rise to significant effects on the Natura 2000 network of sites. In relation to collision risk, it will be necessary to gather detailed site-specific data on bird movements in the area in order to adequately assess the potential risk of collision occurring and to inform appropriate mitigation solutions. It is suggested that this is most appropriate at project level assessment.</p>	
7	With regard to a consideration of conservation objectives, and in particular site-specific conservation objectives which include attributes and targets, it is stated in section 3.3 that these will be more useful at project level AA. There has therefore been no real discussion of the attributes and targets and how they might be impacted by the Strategy. As stated above this Department is of the view that the issues need to be assessed at Strategy level, as pushing it down to project level will not adequately address the cumulative impacts of the whole strategy.	As referred to in section 3.3 of the AA NIR, the attributes and targets that define favourable conservation condition of QIs / SCIs at the site level have been used in the assessment to inform the likely sensitivity of sites and their QIs / SCIs to potential effects. Meaningful assessment of impacts on SSCOs at the strategic level presents a difficulty due to the scale of assessment being at the regional scale yet the SSCOs are developed for use at the site scale. To address the concerns raised by the Department it is proposed to make additional references to effects on attributes and targets in the assessment of impacts.	Section 3.2 will be updated to relate the identified impacts to attributes and targets of various QIs / SCIs.
8	Table 4.1 details mitigation measures for Natura 2000 sites. It is noted that one mitigation proposal is that " <i>Where Integrated Management Plans are being prepared for European sites (or parts thereof), the NTA shall engage with the National Parks and Wildlife Service in order to ensure that plans are fully integrated with the Strategy and other plans and programmes, with the intention that such plans are practical, achievable and sustainable and have regard to all relevant ecological, cultural, social and economic consideration</i> ". In the absence of such plans it should be noted that the use of attributes and targets in site-specific conservation objectives will in themselves determine site management to a large extent. For example on examining the site specific conservation	Noted. The mitigation measure will be expanded in both SEA and AA documents.	<p>To expand the measure 'NPWS & Integrated Management Plans' detailed in Table 9.2 of the SEA Environmental Report and Table 4.1 of the AA Natura Impact Report, which the Strategy commits to implement, as follows:</p> <p>Regarding, integrated management plans, Article 6(1) of the Habitats Directive requires that Member States establish the necessary conservation measures for European sites involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans. The NPWS's current priority is to identify site specific conservation objectives; management plans may be considered after this is done.</p> <p>Where Integrated Management Plans are being prepared for European sites (or parts thereof), the NTA shall engage with the National Parks and Wildlife Service in order to ensure that plans are fully integrated with the Strategy and other plans and programmes, with the intention that such plans are practical,</p>

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	objectives for Malahide Estuary SAC it can be seen that for the habitat of mudflats and sandflats not covered by seawater at low tide, that for the attribute of habitat area the target is that the permanent habitat area is stable or increasing, subject to natural processes. Therefore the site should be managed to ensure no habitat loss of mudflats and sandflats not covered by seawater at low tide other than by natural processes. Where site-specific conservation objectives are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its integrity are analysed and assessed. This same mitigation is also in Table 9.1 of the SEA and the same comments apply.		achievable and sustainable and have regard to all relevant ecological, cultural, social and economic considerations. In the absence of management plans, the NTA will have due regard to the management requirements of European sites as implied by published Site Specific Conservation Objectives (SSOCs).
9	Table 2-6 lists the Natura 2000 sites that were screened within a 15 km radius. However, since the GDA Cycle Network Plan is part of a National plan, the screening would need to take into account for example the Dublin to Galway proposed cycle route.	<p>Future projects included in existing plans which may (or may not) occur have been considered in the assessment of cumulative effects as components of individual plans. Any potential adverse effects which may arise as a result of the Strategy – alone or in-combination with other plans or programmes – will be mitigated by the measures which have been integrated into the Strategy which will ensure that development under the Strategy will not impact on the Natura 2000 network of sites³.</p> <p>The current NIR considers the Greater Dublin Area Cycle Network Plan which has been integrated into the Strategy. This Greater Dublin Area Cycle Network Plan incorporates various provisions for various projects which may (or may not) occur, including a greenway route which adjoins what is referred to as a "Dublin to Galway cycleway" at the Royal Canal. This Plan has also been subject to Stage 2 AA which</p>	<p>To update Section 8.3 of the Strategy as follows (also update where repeated in SEA and AA documents):</p> <p>Section 8.3 Corridor and Route Selection Process The following Corridor and Route Selection Process will be undertaken for relevant new infrastructure:</p> <p>Stage 1 – Route Corridor Identification, Evaluation and Selection</p> <ul style="list-style-type: none"> • Environmental constraints (including those identified in identified in Section 4 of the SEA Environmental Report) and opportunities (such as existing linear infrastructure) will assist in the identification of possible route corridor options; • Potentially feasible corridors within which infrastructure could be accommodated will be identified and these corridors assessed. The selection of the preferred route corridor will avoid constraints and meet opportunities to the optimum extent, as determined by the relevant specialists; and • In addition to the constraints identified above, site specific field data may be required to identify the most appropriate corridors.

³ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

- a) no alternative solution available,
- b) imperative reasons of overriding public interest for the plan to proceed; and
- c) Adequate compensatory measures in place.

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		concludes, inter alia, that avoidance of significant negative impacts on Natura 2000 sites should be achievable. It is noted that a recent government decision pauses progression of the western part of the "Dublin to Galway cycleway" in all of counties Galway and Roscommon. Any potential adverse effects which may arise as a result of the Strategy – alone or in-combination with the GDA Cycle Network Plan – will be mitigated by the measures which have been integrated into the Strategy which will ensure that development under the Strategy will not impact on the Natura 2000 network of sites ⁴ .	<p>Stage 2 – Route Identification, Evaluation and Selection</p> <ul style="list-style-type: none"> • Potentially feasible routes within the preferred corridor will be identified and assessed. The selection of preferred routes will avoid constraints and meet opportunities to the optimum extent, as determined by the relevant specialists, taking into account project level information and potential mitigation measures that are reliably achievable; • In addition to the constraints identified above, site specific field data may be required to identify the most appropriate routes; and <p>In addition to environmental considerations, the identification of route corridors and the refinement of the route lines is likely to be informed by other considerations.</p> <p>To update the measure 'Construction and Environmental Management Plans' detailed in Table 9.2 of the SEA Environmental Report and Table 4.1 of the AA Natura Impact Report, which the Strategy commits to implement, as follows:</p> <p>Construction Environment Management Plans (CEMPs) shall be prepared in advance of the construction of larger projects and implemented throughout. Such plans shall incorporate relevant and reliable mitigation measures which have been integrated into the Strategy and any lower tier Environmental Impact Statement or Appropriate Assessment. CEMPs typically provide details of intended construction practice for the proposed development, including:</p> <ol style="list-style-type: none"> a. location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse, b. location of areas for construction site offices and staff facilities, c. details of site security fencing and hoardings, d. details of on-site car parking facilities for site workers during the course of construction, e. details of the timing and routing of construction traffic to and from the construction site and associated directional signage, f. measures to obviate queuing of construction traffic on the adjoining road network, g. measures to prevent the spillage or deposit of clay, rubble or other debris, h. alternative arrangements to be put in place for pedestrians and vehicles in the

⁴ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

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No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
			<p>case of the closure of any public right of way during the course of site development works,</p> <p>i. details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels,</p> <p>j. containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained; such bunds shall be roofed to exclude rainwater,</p> <p>k. disposal of construction/demolition waste and details of how it is proposed to manage excavated soil,</p> <p>l. a water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains,</p> <p>m. details of a water quality monitoring and sampling plan.</p> <p>n. if peat is encountered - a peat storage, handling and reinstatement management plan.</p> <p>o. measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).</p> <p>p. appointment of an ecological clerk of works at site investigation, preparation and construction phases.</p> <p>To update the measure 'Maintenance' detailed in Table 9.2 of the SEA Environmental Report and Table 4.1 of the AA Natura Impact Report, which the Strategy commits to implement, as follows:</p> <p>Relevant lower tier assessments should examine the need for shall put in place Maintenance Plans informed by environmental considerations where relevant and appropriate. to be prepared and implemented.</p>
10	The European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) and 2013 (SI 499 of 2013) should be added to table 2.1. Table 2.1 also refers to the Wildlife Act of 1976 and the Wildlife (Amendment) Act of 2000. It should be noted that the Wildlife Acts can be quoted collectively as the Wildlife Acts 1976-2010 and this incorporates all the amendments.	Noted. References to this legislation in the AA Natura Impact Report will be updated.	To update references to relevant legislation in the AA Natura Impact Report.
11	Table 4-2 of the NIS contains the indicators, targets and monitoring taken from the SEA which apply to the Natura 2000 sites. These are discussed under SEA below.	Noted. Updates will be made to relevant indicators wherever they appear in the SEA Environmental Report and AA Natura Impact Report.	<p>To update the following indicators wherever they appear in the SEA Environmental Report and AA Natura Impact Report:</p> <p>B1: Maintenance of favourable conservation status for all habitats and species protected under National and International legislation to be unaffected by implementation of the Strategy Implementation of the Strategy should not prevent the maintenance or restoration of favourable conservation status of listed habitat and species⁵</p>

⁵ With regard to Natura 2000 sites there should be no significant adverse effects except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

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			B3: To avoid significant impacts on relevant habitats ⁶ , species, environmental features or other sustaining resources in designated sites including Wildlife Sites and to contribute towards compliance with the Wildlife Acts 1976-2010 with regard to the protection of listed species ⁷
12	Table 2-7 lists plans and programmes that could give rise to cumulative effects. It is unclear why projects have not been included. Additional plans that should be included are the County Heritage Plans, County Biodiversity Action Plans and the Waterways Ireland draft Heritage Plan.	<p>Table 2-7 will be updated to include interactions with County Heritage Plans, County Biodiversity Action Plans and the Waterways Ireland draft Heritage Plan.</p> <p>Future projects included in existing plans which may (or may not) occur have been considered in the assessment of cumulative effects as components of individual plans. Any potential adverse effects which may arise as a result of the Strategy – alone or in-combination with other plans or programmes – will be mitigated by the measures which have been integrated into the Strategy which will ensure that development under the Strategy will not impact on the Natura 2000 network of sites⁸.</p> <p>The consideration of the Strategy against Natura 2000 sites, encompasses the consideration of natural/semi-natural elements and man-made/altered structures i.e. existing individual projects.</p>	To update Table 2-7 of the AA Natura Impact Report to include interactions with County Heritage Plans, County Biodiversity Action Plans and the Waterways Ireland draft Heritage Plan.
13	It is recommended by this Department that the NIS is amended to take account of the above comments to ensure that a more robust assessment is carried out.	Noted.	See updates above.
14	SEA Table 5.1 lists the SEO's with targets and indicators. There are three SEOs for Biodiversity, Flora and Fauna.	Noted. Updates will be made to relevant indicators wherever they appear in the SEA Environmental Report and AA Natura Impact Report.	To update the following indicators wherever they appear in the SEA Environmental Report and AA Natura Impact Report: B1: Maintenance of favourable conservation status for all habitats and species

(a) No alternative solution available;

(b) Imperative reasons of overriding public interest for the plan/programme/project to proceed; and

(c) Adequate compensatory measures in place.

⁶ Relevant habitats are those for which ecological sites are designated for

⁷ List species are those which are specifically listed in legislation for protection

⁸ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

a) no alternative solution available,

b) imperative reasons of overriding public interest for the plan to proceed; and

c) Adequate compensatory measures in place.

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
	There appears to be some confusion between the SEOs and their indicators and targets. For example B1 relates to Natura 2000 sites yet the target includes nationally protected species which differs from species protected under the Birds and Habitats Directives. This may need to be amended. Table 10.1 may also therefore need to be similarly amended. In addition the terms "relevant habitats" and "listed species" etc. used in table 10.1 need to be explained.		protected under National and International legislation to be unaffected by implementation of the Strategy Implementation of the Strategy should not prevent the maintenance or restoration of favourable conservation status of listed habitat and species ⁹ B3: To avoid significant impacts on relevant habitats ¹⁰ , species, environmental features or other sustaining resources in designated sites including Wildlife Sites and to contribute towards compliance with the Wildlife Acts 1976-2010 with regard to the protection of listed species ¹¹
15	Tables in section 8.6 show interactions with SEOs of the provisions of the Strategy. It is unclear however how B1-B3 appear in both green and orange in most instances. This needs to be clarified.	Noted. Clarification will be provided at the beginning of Section 8.6.	To add the following text to Section 8.6 of the SEA Environmental Report: Some SEOs occur in both the "Likely to Improve status of SEOs" and "Potential Conflict with status of SEOs- likely to be mitigated" columns as the provisions have the potential to both contribute towards the protection of the environment and potentially conflict with it. For example, with regard to biodiversity and flora and fauna (SEOs B1 B2 B3), the Strategy: <ul style="list-style-type: none"> • Facilitates lower overall effects on ecology (including designated sites, ecological connectivity, habitats) – due to increased utilisation of lands within existing development boundaries and use of existing utilities and brownfield sites. • Facilitates contribution towards the protection of vegetation as a result of contributing towards the protection of environmental vectors, especially air • Facilitates potential ecological enhancement interventions along transport corridors However, the Strategy also presents the following potentially significant adverse effects: <ul style="list-style-type: none"> • Arising from both construction and operation of transport infrastructure and services and associated facilities/ infrastructure: loss of/damage to biodiversity in designated sites, ecological connectivity and non-designated habitats; and disturbance to biodiversity and flora and fauna • Habitat loss, fragmentation and deterioration, including patch size and edge effects

⁹ With regard to Natura 2000 sites there should be no significant adverse effects except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

- (a) No alternative solution available;
- (b) Imperative reasons of overriding public interest for the plan/programme/project to proceed; and
- (c) Adequate compensatory measures in place.

¹⁰ Relevant habitats are those for which ecological sites are designated for

¹¹ List species are those which are specifically listed in legislation for protection

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
			<ul style="list-style-type: none"> • Disturbance (e.g. due to noise and lighting along transport corridors) and displacement of protected species and coastal squeeze • Effects in riparian zones where new crossings of waters, if any, are progressed • Potential effects from transport emissions
16	Table 8.6.1 deals with interactions of heavy rail infrastructure. As discussed above under the heading of "NIS" this Department has concerns re the cumulative impacts of the GDA Cycle Network Plan and this strategy on biodiversity and in particular on Malahide and Rogerstown Estuaries Natura 2000 sites as a result of the electrification of the line. In addition this Department has concerns regarding impacts on ecological corridors as envisaged under Article 10 of the Habitats Directive and on species listed on annex IV of the Habitats Directive for strict protection such as otters and bats that live within these corridors. These issues have not been adequately addressed in the SEA environmental report.	Ecological connectivity has been considered by the SEA and various provisions have been integrated into the Strategy which will benefit compliance with Article 10 of the Habitats Directive such as the following "Biodiversity and Ecological Networks" measure included in Table 9.2 of the SEA Environmental Report (the measures in this table have been integrated into the Strategy through the commitment provided at Section 8.5 of the Strategy): <i>To contribute towards the protection and enhancement of biodiversity and ecological connectivity, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, geological and geo-morphological systems, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones in the context of Article 10 of the Habitats Directive.</i>	<p>Section 8.6.1 of the SEA Environmental will be updated to address impacts on ecological corridors and on species listed on annex IV of the Habitats Directive.</p> <p>The cumulative effects and interactions will also consider the potential for the provision of electrification to avoid the continuation of noise and air pollution from diesel trains and / or the effects of increased recreation by walking and cycling compared to current levels of car-borne activities in these areas.</p> <p>See also Point no. 5 above</p>
17	Please see above comments made under the heading of "NIS" that also apply also to table 9-1 of the SEA.	See responses and updates to point no's. 3 and 8 above.	See responses and updates to point no's. 3 and 8 above.
18	It is acknowledged on page 85 of table 9.1 that site specific field data may be required to identify the most appropriate corridors. The NTA should note that it will be important to ensure a route is ecologically feasible before continuing further to detailed design.	Noted – the integration of ecological considerations into all levels of decision making is provided for by the Strategy.	None.
19	On page 85 of table 9.1 Appendix B is referred to, but it does not appear to be present.	This is an error and will be corrected.	<p>To update the text on Table 9.1 as follows:</p> <p>Environmental constraints (including those identified in identified in Section 4 Chapter 7 and Appendix B of the SEA Environmental Report) and opportunities (such as existing linear infrastructure) will assist in the identification of possible route corridor options.</p>
20	The European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) and 2013 (SI 499 of 2013) should be added to table 9.1 on page 88 and also to page 104 of Appendix I. It should be noted that the Wildlife Acts can be quoted collectively as the Wildlife Acts 1976-2010 and this incorporates all the amendments. The National Biodiversity Plan seems to be mentioned twice in appendix I, on pages 104 and 108 but with different explanatory text.	<p>The reference to the European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) will be replaced with references to the European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) as amended.</p> <p>The two references to the National Biodiversity Plan in Appendix I can be merged.</p> <p>To quote the Wildlife Acts collectively as the Wildlife Acts 1976-2010.</p>	<p>The replace references to the European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) with references to the European Communities (Natural Habitats) Regulations, 2011 (SI No 477 of 2011) as amended.</p> <p>To quote the Wildlife Acts collectively as the Wildlife Acts 1976-2010.</p> <p>To merge the two references to the National Biodiversity Plan in Appendix I into one reference.</p>

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21	Heritage Plans have been included in appendix I. It is presumed these refer to the County Heritage Plans. In addition it should be noted that Waterways Ireland currently have a draft Heritage Plan.	The presumption is correct and this can be clarified in the report.	To replace reference to "Heritage Plans" in Appendix I with reference to "County Heritage Plans and Waterways Ireland Draft Heritage Plan"
22	It is recommended by this Department that the SEA Environmental Report is amended to take account of the above comments.	Noted.	See updates above.

David Healy Submission

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green
1	The Environmental Report for the Strategic Environmental Assessment fails to supply the information which is required. Although quantified predictions of environmental impacts are available to the National Transport Authority and contained in other documentation, they are not supplied in the Environmental Report as required. Baseline data on the current state of the environment, such as transport-related emissions data and ambient air quality data are also not supplied. This information is legally required to be contained in the Environmental Report. See Annex I of the SEA Directive.	<p>It is agreed that the SEA Environmental Report does not quantify detailed impacts. The appropriate information required under the relevant legislation has been included in the Environmental Report. Annex 1 of Directive 2001/42/EC sets out what is required to be included and addressed in the Environmental Report. The Environmental Report prepared for the "Draft Transport Strategy for the Greater Dublin Area 2016 – 2035" complies in full with those requirements. It should be noted that the Strategy is a high level, strategic document with a blend of different types of provisions, ranging from permitted projects to high level policies and intentions. As such it, and the information required to be included in the SEA, differs from the level of detail available at individual project level. It would be premature and speculative for the SEA to include quantified [i.e. project level] predictions of emissions due to:</p> <ul style="list-style-type: none"> • the lack of relevant detail for high-level specific policies and intentions • uncertainty regarding the progression of different individual projects • uncertainty regarding of combinations of individual projects policies and policies referred to in the Strategy. <p>The resultant material would purport to provide reliability based data that would be based upon an excessively wide range of variance in data. Such spurious data would be highly misleading.</p>	None.
2	The Environmental Report fails to consider alternatives. The alternatives reportedly considered are "uneven provision of transport" and "under provision of transport". Actual alternatives to various elements of the strategy have not been considered. This is despite the fact that the detailed transport modelling carried out would make it quite	It is incorrect to state that "the Environmental Report fails to consider alternatives". Section 6 of the Environmental Report does set out the alternatives considered, while the subsequent Section evaluates those alternatives. The draft Strategy is a high level, strategic document with	To include a new Section in the SEA Environmental Report Section 7.5 Alternatives by Corridor.

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA
	practical to model the environmental impact and report on the different environmental impacts of different options. This information is also legally required to be contained in the Environmental Report. (Annex I of the SEA Directive)	<p>a blend of different types of provisions. This blend includes high level policies and intentions – many of which relate to specific projects which are at various stages of the planning process. Although further modelling and further consideration of alternatives and outputs could be undertaken for the Strategy, such an approach would produce spurious data, be internally inconsistent and would be subject to various limitations. Due to the extent of uncertainty regarding the progression of different individual projects and the progression of combinations of individual projects referred to in the Strategy it is appropriate and consistent with environmental assessment legislation for lower tier transport and land use planning and applications to give further consideration to alternatives (see Figure 3.2 'Hierarchy of Planning and Environmental Assessment' in SEA Environmental Report).</p> <p>Notwithstanding this, the tiered approach taken in relation to the consideration of alternatives within corridors will be documented within the SEA Environmental Report.</p>	New text in green
3	The Environmental Report does not evaluate the draft Strategy against the Strategic Environmental Objectives. Valid Environmental Indicators and Targets are not specified. In a credible Environmental Assessment process, Indicators would typically be types of pollutants and Targets would be the emissions or ambient concentrations which would be required to be met. The Environmental report states that:	<p>It is incorrect to state that <i>"the Environmental Report does not evaluate the draft Strategy against the Strategic Environmental objectives"</i>. Section 5 of the Environmental Report sets out valid indicators and targets to accompany the Strategic Environmental Objectives (SEOs).</p> <p>Section 7 of the document includes an evaluation of the alternatives considered against the SEOs.</p> <p>Section 8 includes an analysis of the draft Strategy provisions against the SEOs, with Section 8.6 providing a detailed evaluation of the Strategy provisions assessed against the SEOs.</p> <p>The SEOs cover a wide range of the most relevant issues relating to air and climatic factors (emissions to air, modal change and energy usage). Indicator C1i can be updated to encompass other legislative requirements and target C1i can be updated to include a link to the EPAs website on detailed air quality targets.</p> <p>In addition, it is proposed to add a new Section 8.6 to the Strategy and expand the 'Air and Energy' measure included in Table 9.2 of the SEA Environmental Report (the measures in this table have been integrated into the Strategy through the commitment provided at Section 8.5 of the Strategy).</p>	<p>To update Indicator C1i as follows: Compliance with legislation including the Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive and the 4th Daughter Directive and adherence to the principles of the Convention on Long Range Transport of Air Pollution associated legislation</p> <p>To update Target C1i as follows: C1i: To contribute towards compliance with legislative air quality limits and target values¹²</p> <p>To add a new section to the Strategy as follows:</p> <p>8.6 Other Plans and Environmental Policies <i>Various policies related to climate change, carbon emissions and associated action plans are under development at the time of</i></p>

¹² Information on air quality including standards is made available and kept up to date by the EPA at <http://www.epa.ie/air/quality/standards>.

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	<p>Strategic Environmental Objectives (SEOs) are methodological measures developed from policies which generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives which have been transposed into Irish law and which are required to be implemented.</p> <p>The SEOs are set out under a range of topics and are used as standards against which the provisions of the Draft Strategy and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects - unmitigated.</p> <p>The SEOs are linked to indicators which can facilitate monitoring the environmental effects of the Draft Strategy as well identifying targets which the Strategy can help work towards.</p> <p>It includes the following objectives, indicators and targets for air, climate and human health:</p>	<p>Regarding predicted emissions, quantified assessments etc. please refer to point no. 2 above.</p>	<p>New text in green</p> <p><i>preparation of this Strategy. This includes new legislation in the form of the "Climate Action and Low Carbon Development Bill 2015". That Bill, when enacted, will include provision for the preparation of a "national mitigation plan" and a "national adaptation framework", which will establish energy related targets and actions to be adopted across the transport sector.</i></p> <p><i>The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.</i></p> <p>To expand the measure 'Air and Energy' detailed in Table 9.2 of the SEA Environmental Report, which the Strategy commits to implement, as follows:</p> <p>Air and Energy</p> <p><i>To contribute towards: compliance with air quality legislation; greenhouse gas emission targets; management of noise levels; and reductions in energy usage. This includes: contributions towards meeting legislative targets contained in the CAFE Directive as transposed into Irish legislation by the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011); principles of the Convention on Long Range Transport of Air Pollution; and incorporation of the relevant targets and actions arising from the Climate</i></p>

No.	Relevant Submission Text	Response	Updates to Strategy / SEA / AA New text in green																					
	<table border="1"> <thead> <tr> <th>Environmental Component</th><th>Strategic Objectives</th><th>Indicators</th><th>Targets</th></tr> </thead> <tbody> <tr> <td rowspan="3">Air and Climatic Factors</td><td>C1: To facilitate a reduction in travel related emissions (including pollutants, noise and greenhouse gas emissions) to air</td><td>C1i: Compliance with Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive and associated legislation C1ii: Greenhouse gas emissions from transport</td><td>C1i: To contribute towards compliance with legislative air quality limits and target values C1ii: To facilitate a reduction in greenhouse gas emissions from transport</td></tr> <tr> <td>C2: To encourage modal change from car to more sustainable forms of transport</td><td>C2: Percentage of population travelling to work, school or college by public transport or non-mechanical means</td><td>C2: An increase in the percentage of the population travelling to work, school or college by public transport or non-mechanical means</td></tr> <tr> <td>C3: To facilitate a reduction in energy use by the transport sector</td><td>C3: Energy use by the transport sector as a percentage of Total Final Energy Consumption</td><td>C3: To facilitate a reduction in the percentage of energy use by the transport sector as a percentage of Total Final Energy Consumption</td></tr> <tr> <td rowspan="2">Population and Human Health</td><td>P1: To develop transport infrastructure and services closer to urban/suburban areas</td><td>P1: Extent of urban/suburban areas within the catchment of transport infrastructure and services</td><td>P1: To maximise the extent of urban/suburban areas within the catchment of transport infrastructure and services</td></tr> <tr> <td>HH1: To protect populations and human health from exposure to incompatible landuses</td><td>HH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors resulting from development provided for by the Strategy, as identified by the Health Service Executive and Environmental Protection Agency</td><td>HH1: No spatial concentrations of health problems arising from environmental factors as a result of implementing the Strategy</td></tr> </tbody> </table> <p>So some of the specific legal obligations in relation to air emissions have been identified in outline. Others, such as the Convention on Long Range Transport of Air Pollution have not. The requirements of none of the various legal instruments have been set out. The Strategic Environmental Assessment process should compare predicted emission levels and predicted ambient concentrations with the various legal limits applicable as well as with health guidelines adopted at national, EU or international levels (e.g. by the World Health Organisation) These should be found as the indicators in the table above. In fact, the assessment does not compare predicted results with legal or scientific thresholds. Instead, this is what is offered as analysis.</p>	Environmental Component	Strategic Objectives	Indicators	Targets	Air and Climatic Factors	C1: To facilitate a reduction in travel related emissions (including pollutants, noise and greenhouse gas emissions) to air	C1i: Compliance with Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive and associated legislation C1ii: Greenhouse gas emissions from transport	C1i: To contribute towards compliance with legislative air quality limits and target values C1ii: To facilitate a reduction in greenhouse gas emissions from transport	C2: To encourage modal change from car to more sustainable forms of transport	C2: Percentage of population travelling to work, school or college by public transport or non-mechanical means	C2: An increase in the percentage of the population travelling to work, school or college by public transport or non-mechanical means	C3: To facilitate a reduction in energy use by the transport sector	C3: Energy use by the transport sector as a percentage of Total Final Energy Consumption	C3: To facilitate a reduction in the percentage of energy use by the transport sector as a percentage of Total Final Energy Consumption	Population and Human Health	P1: To develop transport infrastructure and services closer to urban/suburban areas	P1: Extent of urban/suburban areas within the catchment of transport infrastructure and services	P1: To maximise the extent of urban/suburban areas within the catchment of transport infrastructure and services	HH1: To protect populations and human health from exposure to incompatible landuses	HH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors resulting from development provided for by the Strategy, as identified by the Health Service Executive and Environmental Protection Agency	HH1: No spatial concentrations of health problems arising from environmental factors as a result of implementing the Strategy		<p><i>Action and Low Carbon Development Bill 2015 and the national mitigation and adaptation plans and related policies in the area of transport energy.</i></p>
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	<p>Table 7.5 Effects Arising from Alternative developed as the Draft Strategy</p> <table> <tr> <th>Environmental Component</th><th>Significant Positive Effect, likely to occur</th><th>Potentially Adverse Effect, if unmitigated</th><th>Significant Residual Adverse Effect</th></tr> <tr> <td>Air and climatic factors</td><td> <ul style="list-style-type: none"> Facilitates contribution towards a shift from car to more sustainable and non-motorised transport modes Facilitates contribution towards managing traffic flows and associated adverse effects on air quality Facilitates contribution towards reductions in travel related greenhouse gas and other emissions to air </td><td> <ul style="list-style-type: none"> Emissions to air </td><td> <ul style="list-style-type: none"> An extent of travel related greenhouse gas and other emissions to air. This has been mitigated by provisions which have been integrated into the Strategy, including those relating to sustainable mobility. </td></tr> <tr> <td>Population and human health</td><td> <ul style="list-style-type: none"> Facilitates contribution towards the protection of human health as a result of contributing towards the protection of environmental vectors, especially air Provides for the development of transport infrastructure and services in locations which will facilitate use by those living and working in urban/suburban areas </td><td> <ul style="list-style-type: none"> Potential interactions if effects upon environmental vectors such as air are not mitigated </td><td> <ul style="list-style-type: none"> An extent of travel related greenhouse gas and other emissions to air. This has been mitigated by provisions which have been integrated into the Strategy, including those relating to sustainable mobility. </td></tr> </table> <p>These off-the cuff unquantified assessments then immediately become Overall Findings:</p>	Environmental Component	Significant Positive Effect, likely to occur	Potentially Adverse Effect, if unmitigated	Significant Residual Adverse Effect	Air and climatic factors	<ul style="list-style-type: none"> Facilitates contribution towards a shift from car to more sustainable and non-motorised transport modes Facilitates contribution towards managing traffic flows and associated adverse effects on air quality Facilitates contribution towards reductions in travel related greenhouse gas and other emissions to air 	<ul style="list-style-type: none"> Emissions to air 	<ul style="list-style-type: none"> An extent of travel related greenhouse gas and other emissions to air. This has been mitigated by provisions which have been integrated into the Strategy, including those relating to sustainable mobility. 	Population and human health	<ul style="list-style-type: none"> Facilitates contribution towards the protection of human health as a result of contributing towards the protection of environmental vectors, especially air Provides for the development of transport infrastructure and services in locations which will facilitate use by those living and working in urban/suburban areas 	<ul style="list-style-type: none"> Potential interactions if effects upon environmental vectors such as air are not mitigated 	<ul style="list-style-type: none"> An extent of travel related greenhouse gas and other emissions to air. This has been mitigated by provisions which have been integrated into the Strategy, including those relating to sustainable mobility. 		
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	<p>8.1 Overall Findings</p> <p>The overall findings of the SEA are that:</p> <ul style="list-style-type: none"> • Compliance with Legislation and Guidelines – Environmental Protection and Sustainable Development <p>The National Transport Authority have integrated all recommendations arising from the SEA and Appropriate Assessment processes into the Transport Strategy, facilitating compliance of the Strategy with various European and National legislation and Guidelines relating to the protection of the environment and the achievement of sustainable development.</p> <ul style="list-style-type: none"> • Improvements in Sustainable Mobility and Associated Effects (emissions, noise and energy usage) <p>The Strategy facilitates improvements in sustainable mobility (reducing and limiting increases in the number of journeys by car taken as a percentage of all journeys taken), thereby facilitating a reduction/limit of increases in greenhouse gas emissions, noise emissions, other emissions to air and energy usage. Such emissions would occur otherwise with higher levels of motorised transport and associated traffic.</p>		
4	<p>These stated predictions are contrary to the estimates derived from the modelling which are that emissions will increase, although the exact quantity of the predicted increase has not been reported. Despite not being included in the Environmental Report, quantified emissions predictions were generated as part of the modelling of the draft Strategy. On the next page after the Overall Findings quoted above, the Environmental Report states:</p> <p>The NTA also undertook environmental assessment as part of the modelling which was undertaken in conjunction with the preparation of the Strategy. Detailed consideration was given to emissions, noise and severance as follows:</p> <ul style="list-style-type: none"> • Modelled Emissions <p>All types of vehicle emissions (Carbon Monoxide, Carbon Dioxide, Nitrous Oxides and Hydrocarbons) reduce under the Transport Strategy. This highlights the air quality improvements for the GDA associated with the introduction of the GDA Transport Strategy provisions</p> <p>Inexplicably these emissions predictions aren't presented in the Environmental Report. Some sparse information is supplied in the Modelling Report. https://www.nationaltransport.ie/wp-content/uploads/2015/10/Transport_Modelling_Report.pdf</p> <p>That report contains a single table on emissions:</p>	<p>There is no inconsistency between the findings of the Environmental Report and the information provided in the background Transport Modelling Report. The Transport Modelling report indicates that, in a simplified emissions trend analysis function available within the transport modelling software, all of the emission values reduce when the Strategy provisions are compared with the position without the Strategy in place, indicating the positive benefits of delivering the Strategy. The nature of this modelling is simplified and conservative in nature but sufficiently robust to confirm the trend position in relation to emissions. The modelling study was used as a policy decision support tool not an emissions prediction tool.</p> <p>The SEA Environmental Report can be updated to further clarify these findings.</p> <p>Regarding predicted emissions, quantified assessments etc. please also refer to point no. 2 above.</p> <p>Certain environmental indicators are assessed by the NTA Transport Model and were incorporated into the SEA. The "Transport Modelling Report" details these and was published alongside the strategy.</p>	<p>To update, as follows, text from Section 8.1 of the SEA Environmental Report:</p> <p>The Strategy facilitates contributions towards improvements in sustainable mobility (reducing and limiting increases in the number of journeys by car taken as a percentage of all journeys taken), thereby facilitating contributions towards a reduction/limit of increases in greenhouse gas emissions, noise emissions, other emissions to air and energy usage. Such emissions would occur otherwise with higher levels of motorised transport and associated traffic.</p> <p>To update, as follows, text from Section 8.1 of the SEA Environmental Report:</p> <p>All types of vehicle emissions (Carbon Monoxide, Carbon Dioxide, Nitrous Oxides and Hydrocarbons) reduce</p>

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	<div>5.6.1 Emissions</div> <div>Table 5-12 details the comparison of vehicle emissions for the GDA for the AM, Inter Peak (IP) and PM peak hours, for the Do Minimum and the Do Strategy scenarios. The model outputs indicate that that all types of vehicle emissions reduce in the Do Strategy scenario.</div> <div>Table 5-12: GDA Network Emissions</div> <table><tr><th rowspan="2">Pollutants</th><th colspan="2">AM</th><th colspan="2">IP</th><th colspan="2">PM</th></tr><tr><th>Do Min</th><th>Do Strat</th><th>Do Min</th><th>Do Strat</th><th>Do Min</th><th>Do Strat</th></tr><tr><td>CO</td><td>32,582.</td><td>31,318</td><td>17,121</td><td>16,396</td><td>29,748</td><td>28,804</td></tr><tr><td>CO2</td><td>344,288</td><td>337,624</td><td>204,462</td><td>198,866</td><td>322,848</td><td>316,549</td></tr><tr><td>NOX</td><td>7,318</td><td>7,178</td><td>4,506</td><td>4,327</td><td>6,883</td><td>6,644</td></tr><tr><td>HC</td><td>5,855</td><td>5,637</td><td>3,118</td><td>2,987</td><td>5,359</td><td>5,188</td></tr></table> <div>No information on current/baseline emissions levels is given. All these differences comparing 'do nothing' and implementing the strategy are of between 2% and 4%, so the strategy has almost no impact on total emissions. Neither the Environmental Report nor the Transport Modelling Report uses the predicted emissions to estimate compliance with legal obligations or to evaluate impacts on human health. I requested a copy of the “environmental assessment” undertaken “as part of the modelling” as referred to in the Environmental Report. However, at the time of preparing this submission I have not received a response. Given that there is no baseline data in the emissions table, the big outstanding question which the documents don't even address is how the predicted level of emissions compares with current emissions. There is some baseline data in relation to some of the modelling itself. Total car trips will increase in both the Do Minimum and the Do Strategy scenarios - by about 15% in the Do Minimum, and 8 or 9% in the Strategy scenario. Given that, contrary to what is stated in both the Environmental Report and the Modelling Report, vehicle emissions will not reduce. This data shows that the difference between Do Minimum and Do Strategy is 5%. So the impact of the strategy on the number of car trips is greater than its impact on emissions. This suggests that each trip in the Strategy Scenario is slightly more polluting that it would have been. The Modelling Report also has predictions for total road distance travelled. The impact of the strategy here is a mere 1% lower total pcu.km than the Do Minimum. So the strategy reduces the number of car trips by 5%, makes the average very slightly longer, leading to a mere 1% reduction in km travelled and makes each trip slightly less polluting per km, resulting in an overall emissions level 2 to 4% lower than the Do Minimum. But the key message is that the Strategy envisages 8 or 9% more car trips than we have now, probably 10 or 11% more pcu.km travelled. (Baseline pcu.km are also not given in the documentation.) And this will mean more pollution than now, exactly how much more depending on the modelling of the individual journeys.</div> <div>I requested a copy of the “environmental assessment” undertaken “as part of the modelling” as referred to in the Environmental Report. However, at the time of</div>	Pollutants	AM		IP		PM		Do Min	Do Strat	Do Min	Do Strat	Do Min	Do Strat	CO	32,582.	31,318	17,121	16,396	29,748	28,804	CO2	344,288	337,624	204,462	198,866	322,848	316,549	NOX	7,318	7,178	4,506	4,327	6,883	6,644	HC	5,855	5,637	3,118	2,987	5,359	5,188		under the Transport Strategy, in comparison with a do minimum scenario. This highlights the air quality improvements for the GDA associated with the introduction of the GDA Transport Strategy provisions.
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	preparing this submission I have not received a response.		
5	The draft Strategy is not designed to meet the Strategic Environmental Objectives. This is clear from the draft Strategy itself, the results of the emissions prediction exercise and associated information on the Strategy from the NTA.	<p>As stated in the SEA Environmental Report (Section 5) Strategic Environmental Objectives (SEOs) are: <i>methodological measures developed from policies which generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives which have been transposed into Irish law and which are required to be implemented. The SEOs are set out under a range of topics and are used as standards against which the provisions of the Draft Strategy and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects - unmitigated.</i></p> <p>The SEA has shown that the Strategy will contribute towards the achievement of legislative objectives to which the SEOs relate.</p>	
6	Insofar as the Strategy will lead to a breach of Ireland's EU law obligations as regards emissions and ambient air pollution concentrations, it is illegal.	It is noted that the statement "[t]hat insofar as the Strategy will lead to a breach of Ireland's EU law obligations as regards emissions and ambient air pollution concentrations, it is illegal" is a conditional statement. The Strategy will comply with the legislative requirements applicable to it, and will substantially assist in Ireland meeting its obligations in the area of emissions and air quality. To provide greater clarity on this matter, it should be noted that a new section 8.6 will be added to the Strategy.	<p>To add a new section to the Strategy as follows:</p> <p><i>8.6 Other Plans and Environmental Policies</i> <i>Various policies related to climate change, carbon emissions and associated action plans are under development at the time of preparation of this Strategy. This includes new legislation in the form of the "Climate Action and Low Carbon Development Bill 2015". That Bill, when enacted, will include provision for the preparation of a "national mitigation plan" and a "national adaptation framework", which will establish energy related targets and actions to be adopted across the transport sector.</i> <i>The implementation of the Strategy will incorporate the relevant targets and actions arising from these and related policies in the area of transport energy. The relevant Integrated Implementation Plans to be developed, pursuant to Section 13 of</i></p>

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			<i>the Dublin Transport Authority Act 2008, will also incorporate the necessary provisions arising from these developing policies.</i>
7	<p>The Strategy is not compatible with the National Policy Position on Climate Action and Low Carbon Development adopted by the Government in 2014. http://www.environ.ie/en/Publications/Environment/Atmosphere/FileDownload,37827,en.pdf This is most surprising as the National Policy Position is stated in the Strategy to be "Primary Policy":</p> <div data-bbox="181 507 1010 794" style="background-color: #f9e6d9; padding: 10px;"> <h2>2.2 Primary Policy</h2> <h3>2.2.1 Climate Action and Low-Carbon Development National Policy Position</h3> <p>In the absence of, and in advance of the development of a set of climate change policies and action plans / roadmaps, it is clear from existing international agreements that Ireland is required to radically reduce dependence on carbon-emitting fuels in the transport sector. The Strategy must therefore, promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions. This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.</p> </div> <p>Despite this declaration of primacy, the objectives of the National Policy Position have not been set out in the Strategy. The Policy Position sets out a long-term vision for decarbonisation:</p> <div data-bbox="181 906 1010 1193" style="background-color: #f9e6d9; padding: 10px;"> <p>The low-carbon roadmapping process will be guided by a long-term vision of low-carbon transition based on –</p> <ul style="list-style-type: none"> • an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and • in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production. </div> <p>Given that this draft Strategy envisages an increase in transport-related emissions in the period to 2035, it is not in keeping with the transition to an 80% reduction in CO₂ emissions by 2050. The NTA has acknowledged that the draft Strategy was designed to meet objectives of modal split and traffic movements, and not emissions objectives.</p>	<p>The Strategy is fully compatible with the National Policy Position on Climate Action and Low Carbon Development. The additional section 8.6 above (see point no. 6), confirms that the implementation of the Strategy will incorporate the relevant targets and actions arising from the "national mitigation plan" and the "national adaptation framework" to be adopted under the provisions of the Climate Action and Low Carbon Development Bill 2015, when enacted.</p>	
8	<p>It will not be possible to adopt this draft Strategy when the Climate Action and Low Carbon Development Bill is enacted. The fact that the draft Strategy is not designed to</p>	<p>Given the provisions of the Strategy, including section 8.6 referred to above (see point no. 6), this draft transport strategy can be adopted</p>	

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	meet climate change objectives is significant. When the Climate Action and Low Carbon Development Bill is enacted, the NTA will be required to comply with Section 15 of the Bill. At that time, it will not be legal for the NTA to adopt or implement this draft Strategy.	following the enactment of the Climate Action and Low Carbon Development Bill 2015.	