



Mr Hugh Creegan  
Director of Transport Investment and Taxi Regulation  
National Transport Authority  
Harcourt Lane  
Dublin 2

13<sup>th</sup> November 2015

Our Ref: SCP150106.2

**Re. Draft Transport Strategy for the Greater Dublin Area 2016-2035 and Strategic Environmental Assessment Environmental Report**

Dear Mr Creegan,

The Environmental Protection Agency (EPA) acknowledges your notice, dated the 15<sup>th</sup> October 2015, regarding the Draft Transport Strategy for the Greater Dublin Area 2016-2035, (the Strategy) and the associated SEA Environmental Report (the SEA ER). Please find attached the Environmental Protection Agency's submission in relation to the Strategy and SEA ER.

The comments below relate to the integration of the environmental considerations and recommendations that have been set out in the Environmental Report, as well as the additional information highlighted by the EPA, within the Plan. Suggestions are put forward for consideration with a view to addressing the integration of a number of key environmental considerations within the Plan.

**Specific Comments on the Strategy to be considered**

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.

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.

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.

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.



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:

- 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 NO<sub>x</sub> (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 (PM<sub>2.5</sub> 12 % and PM<sub>10</sub> 9 %).
- The revised EU National Emissions Ceiling Directive will place further downward pressure on pollutant emissions in Ireland, and NO<sub>x</sub> presents a particularly significant compliance challenge. Reductions in emissions from the transport sector will be required in order to meet the proposed NO<sub>x</sub> emissions ceiling for 2030. Strategies such as the Dublin Transportation Strategy will play a key role in reducing NO<sub>x</sub> emissions from the transport sector.
- Impacts on NO<sub>x</sub> concentrations in the atmosphere from any traffic management measures/changes should be determined in advance (noting that NO<sub>x</sub> limits were previously in 2009 in Dublin city centre).
- Consideration should be given to the PM<sub>2.5</sub> NERT (National Exposure Reduction Target) as specified under the EU CAFE Directive, which requires a 10% reduction in ambient PM<sub>2.5</sub> levels by 2020. Reductions in pollutant loadings from transport sector will be an important contributor to achieving the NERT reductions.
- 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.

#### *Additional Plans/Programmes to Consider*

We recommend that the Strategy in 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.

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.

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.

#### *SEA Alternatives*

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. Using a ‘*multi-criteria assessment approach*’ 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.

Environmental considerations should also be integrated into *Section 4.2 Options Appraisal by Corridor* to identify potential significant environmental effects. Suggested key mitigation measures should be highlighted in order to address or minimise potential for adverse 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.

*Chapter 7 – Land Use Integration and Behavioural 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.).

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.

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.

### **Specific Comments on the SEA ER to be considered**

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.

#### *Existing Environment*

##### Air Quality

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/#.VkHYU9Cv1aQ>. 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/#.VkHYy9Cv1aQ>

##### Landscape

It would be useful to include a reference to the National Landscape Strategy (DECLG, 2015), in terms of integrating areas of significant landscaper character in implementing the Strategy.

#### *Assessment of environmental effects*



We note the alternatives provided in *Section 6 – Description of Alternatives*. 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.

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.

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.

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.

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.

#### *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.

#### *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.

#### **Future Amendments to the Draft Strategy**

Where amendments to the Strategy are proposed, these should be screened for likely 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.

#### **SEA Statement – “Information on the Decision”**

Following adoption of the Strategy, an SEA Statement, should summarise the following:

- 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.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.



Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: [sea@epa.ie](mailto:sea@epa.ie).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Cian O'Mahony'.

**Cian O'Mahony**  
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