Response to Dublin City Development Plan 2022-2028 Public Consultation

14th February 2022

Background

Trinity is the largest trip attractor in Dublin City Centre. The majority of our 16,000 students and 4,000 staff, study or work on our College Green Campus. Whilst the central work of the university is education and research, Trinity also has 661 on campus student beds on College Green/Pearse Street, approximately 1 million visitors per year to the Book of Kells exhibition and multiple cafes and gift shops open to the public. Our conference, private dining and banqueting services are busy year-round and from mid-May to mid-August we operate as the largest accommodation provider in Dublin with over 1,500 beds a night across our College Green and Trinity Hall campuses[1].

Trinity is a global leader in sustainable transport use with only 1% of our students and staff commuting by private car[2]. In 2019, Trinity, PPI Ignite (a research project in Trinity) and BYCS Amsterdam (a Dutch not for profit organisation that promotes cycling) worked with the support of Dublin City Council to facilitate a city-wide debate on how Dublin can become more liveable. During the LiveableDublin events, participants defined and explored the question, "How can we speed up change in Dublin to make it more liveable?"[3]. Trinity made a submission to Dublin City Council on travel during COVID-19 restriction calling for wider footpaths and safer cycling[4]. Trinity believes this work demonstrates that we are committed to working for and with the city to make Dublin more sustainable and liveable.

Response to Consultation

Trinity's response to this consultation is particularly focused on Trinity's four priority routes namely:

- From College Green to Trinity Hall
- From College Green to the Grand Canal Basin along Pearse Street
- From College Green to St. James's Hospital
- Nassau Street

Chapter 1: Executive Summary

1. Trinity College endorses these precepts for promoting a living-city.

The vision is for a capital city where people will choose to:
• live,
• work,
• experience city living,
• invest, and
• socialise.

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[1] https://www.tcd.ie/corporate-services/assets/pdf/annual-report-2018-2019.pdf
[2] https://www.tcd.ie/healthytrinity/travel/Stats.php
[3] https://www.tcd.ie/healthytrinity/liveabledublin/
[4] https://www.tcd.ie/healthytrinity/assets/documents/Covid-19/TCD%20DCC%20Covid%2019%20Submission%20Final.pdf

Chapter 3: Climate Action

1. On pg. 90, we suggest removing the picture of the electric car in the 'Mitigation' section of Fig 3 -1 and replacing this with an image of some form of public transport since an electrified car fleet should not be a primary symbol for transport-related climate mitigation for Dublin city as this is contrary to this plan, which prioritises active travel and public transport

2. On pg. 97, similar to comment 1., we suggest substituting the image of an electric car charger (Fig 3-3) with an image of public transit or active travel since e-cars are the least important element of transport-related climate change mitigation in the draft plan.

3. On pg. 115 – 116, we suggest electric vehicle charging should arguably not be provided in areas that have sufficient alternative modes of transport access (e.g. public transport – perhaps accessible on the outskirts of Dublin through park and ride facilities with EV charging available) where car access could be phased out in the future. Situating electric charging points in the city centre where there are a multitude of sustainable alternatives, for example, would arguably mean even more car-related infrastructure that would lock-in car access where it is likely not required for the vast majority of the populace, at least in very central locations that have extensive (and developing) networks of public transport access, as well as walking and cycling access.

4. Trinity College endorses these vital measures.
- sustainable transport (promoting more walking, cycling and use of
public transport), and
- green-space network and ecosystem services (like more green spaces
and nature based measures to reduce flooding).

Chapter 4: Shape and Structure of the City

1. We support compact development of Dublin City to promote sustainable and health-promoting mobility patterns and greater urban quality of life and accessibility to essential services.

2. We support continuing pedestrianisation of streets in Dublin City and reduced car access. We support road-pricing as a tool to achieve this.

3. We support increasing urban density.

4. We note that cycling connectivity is particularly important for Trinity College in relation to its proposed development of the campus at Grand Canal Harbour.

Chapter 5: Quality Housing and Sustainable Neighbourhoods

In and around Trinity's four priority routes, Trinity would like to see:
1. Speed limits of 30km per hour
2. Wider footpaths
3. The installation of segregated bike lanes and widening of footpaths where they are too narrow
4. Prioritisation of walking and cycling at junctions
5. Where feasible, greening features i.e. planters and shrubs
6. Research into the effects of changes to neighbourhood layouts on transport use and quality of life
7. A focus on travel time between destinations by foot, bicycle or public transport.

Chapter 7: The City Centre, Urban Villages and Retail

CCUVO13 aims to "prioritise the redevelopment of College Green as a pedestrian friendly civic space including the pedestrianisation of Foster Place." Trinity is very supportive of this aim.

Chapter 8: Sustainable Movement and Transport

1. Trinity College seeks the retention and improvement of the infrastructure for cycling installed under COVID19 exigencies to make it easier and safer for staff and students to commute to and from all its campuses so as to encourage even more to use active travel modes. Trinity College supports the creating of a new public realm in College Green that is largely devoid of motor traffic.

2. We support the integration between land use and transport planning under compact development and the 15 minute city to promote both less travel and more sustainable forms of travel.

3. We support 'Accessibility for All' to the built environment of Dublin by incorporating and improving accessibility standards into the pedestrian network of Dublin and in a way that involves engagement with the relevant organisations such as the National Disability Authority, Age Action Ireland, and the Women's Council of Ireland in the planning (and audit) process.

4. Comment for P.278: 'Target Mode Share: 13% Cycling/Micromobility'– we suggest separating these two targets, while acknowledging the challenge of monitoring them separately. It is important to have specific statement about the target mode share for cycling, since this a more strategically targeted – and more sustainable and health-promoting – mode for development than micromobilities. A target of 10% of daily commutes was set in the National Cycling Policy Framework (2009) so it is important to track that goal. Furthermore, there is no count of micromobility at present to compare growth with future targets (e.g. it could already make up 2% of journeys but since there is no baseline, this could lead to misleading figures that suggest potentially increased cycling in the future). We also recommend considering specific targets for an increase in cycle-priority mobility spaces in Dublin City (e.g. segregated spaces, cycle streets where overtaking by drivers is not permitted and the 'car is guest') which would involve measuring a baseline distribution of spatial priority (e.g. % of City space where cycling is spatially prioritised) and making targets for a future redistribution (see Conway et al. 2019 for an inventory of infrastructure in Dublin). This same approach could also be applied to existing cycle parking by comparing current provision (e.g. number of cycle parking spaces by type) with future target provision. Lastly, alike cycle traffic mode share targets, spatial redistribution targets and parking targets, targets for decreased spaces that prioritise driving (using a baseline measure from the present) and decreased parking availability (likewise comparing with a baseline measure) would be a strong addition to mode share reduction targets, since they demonstrate the 'hard measures' achieved (or not achieved) irrespective of actual mode behaviour change, which is complex to achieve and may not always reflect progress toward a more sustainable transport system by itself.

5. We support a pedestrian-prioritised vision of the city centre were non-essential car access is restricted to the greatest extent practicable in order to prioritise sustainable modes of accessing this area and policy of explicit 'reallocation' of space from driving.

6. We think more emphasis and explicit reference needs to be made on the need for the redistribution of road space from driving to cycling in central locations when talking about the development and expansion of cycling networks and infrastructure (e.g. SMTH15). Namely, the implementation of new spaces that prioritise cycling generally requires a reallocation from spaces that prioritise driving so it is important to acknowledge the need for a such a reallocation in achieving an expanded and enhanced high-quality cycling network in Dublin.

7. We think you should mention the DMRS 'Road User Hierarchy' in SMT13 ('City Centre Road Space') in which city centre road-space is managed to address the needs of multiple road users in a way that embodies the 'Road User Hierarchy' that prioritises road space use in the order of walkers, cyclists, transit users, and drivers.

8. We support the last-mile delivery strategy emphasising centrally located micro-delivery hubs and distributions for last-mile active travel delivery along with the repurposing of multi-story car parks to

support this aim. We suggest that this policy (SMT14) could also include a mention of the target modes by which deliveries might be increasingly implemented (e.g., e-cargobikes, walking, micromobilities, small electric vehicles) and the development of sustainable freight mobility infrastructure that would be required to facilitate such deliveries in this fashion. For the 'servicing of premises' section (p. 287), we suggest you clarify if the restriction of large goods vehicles (e.g. semi-trailer HGVs) will be considered that deliver supplies to supermarkets in the inner-core and how illegal parking on cycle tracks and pavements for deliveries may be ended. We know that approx. 50% of semi-trailer HGV intercepts on the HGV Tracker App don't have a valid permit – there appears to be little enforcement of illegal HGV access as matters stand and this should be tackled in any logistics plans in the future.

9. For SMT18 ('Integration of Active Travel with Public Transport'), we suggest that you mention a goal to provide increased secure and sheltered cycle parking for public transport hub access journeys to enable greater sustainable public-transport integrated journey, as this is *the* critical element of public transport-cycle integration in high-cycling contexts (see Martens, 2007).

10. We suggest for SMT08 ('Cycling Infrastructure and Routes') that 'cycle streets' in which car access is restricted, cyclists have priority, and drivers cannot overtake as the 'car is guest' could be where protected cycle lane provision is not being considered. Enforced 30km speed limits could also potentially be mentioned, although we acknowledge this is mentioned later in this chapter.

11. We suggest for SMT09 ('Cycle Parking Spaces') that sheltered and secure cycle parking facilities should explicitly be included as part of this strategy for areas where long-stay parking is likely (e.g. public transit hubs accessed by cycling; workplaces; shopping centres). We also suggest that the guidance should state that toast-rack type bike racks are not fit for purpose.

12. We suggest for Objective SMT015 ('Park and Ride' Services) is a critical area for development to reduce car journeys into the city and that this objective should also strategically focus on cycle and ride facilities in the form of sheltered and secure cycle parking at public transit hubs.

13. For the various parking policy goals in this chapter, we suggest, similar to Modal Share, setting specific targets for reduction of current parking levels/reallocation of parking for cycling would be useful (see Comment 3 for more detailed suggestions). In relation to car parking goals, we strongly support repurposing plans for multi-storey car parks, the phasing out of free car parking (particularly at places of work), and manipulated the supply and price of car parking to promote sustainable transport.

14. We note no mention of explicit policy goals or objectives to more stringently regulate illegal, disregarding and threatening driver behaviour toward people walking (inclusively defined) and cycling that may reinforce an informal road user hierarchy that is contrary to the DMRS (see Lawson et al., 2013; Egan and Philbin, 2021) and may be a key element explaining why people prefer using segregated cycling facilities in Dublin (see Caulfield, Brick and McCarthy, 2012). Beyond Dublin, the phenomenon of drivers dominating shared public spaces in practice is well documented in similar car-centric contexts with low rates of cycling (Heesch, Sahlqvist, and Garrard, 2011; Aldred, 2016; Fruhen, Rossen, and Griffin, 2019). Along with passive means of regulating street environments and the provision of dedicated spaces that are mentioned in this chapter, we recommend explicit policy goals for the active regulation of street environments – in particular, the regulation of disregarding and endangering driver behaviour in the city that undermines the institution of a road user hierarchy that prioritises the needs of walkers and cyclists over drivers. Enforcing such a hierarchy incorporates but transcends considerations of road safety in that it tackles more nuanced and entrenched patterns of dominance in public spaces in Dublin in which active travel users are actively treated as second-class road users. This potentially leads to the abandonment of active travel behaviour on the grounds of

endangerment, disregard and a lack of formal enforcement and protection of active travel user rights to use public space. As long as cyclists and pedestrians continue to use, transit and share spaces with people driving, formal policing regimes are required in order to tackle these patterns of dominance and subordination and therefore warrant inclusion in this chapter as a policy goal. This argument is strengthened further considering the multi-modal potential of walking and cycling as access and egress mode for public transport journeys in Dublin City. Lastly, it is critical that the HGV permit system is enforced in the city, which does not appear to be the case at present.

15. For SMT02, we suggest that road pricing is considered.

16. For SMT07 (p.238), we have evidence from TCD that Travel Plans are generally not followed up on for compliance. This we believe the enforcement of travel plan compliance should be pursued.

17. For SMT17 ('The Pedestrian Environment') we note problematic locations for pedestrians at present around the Trinity Campu (historic campus and Pearse St developments) where pavements are too narrow for the footfall at busy times:

i) Nassau St. alongside Arts Building/Provosts stables.
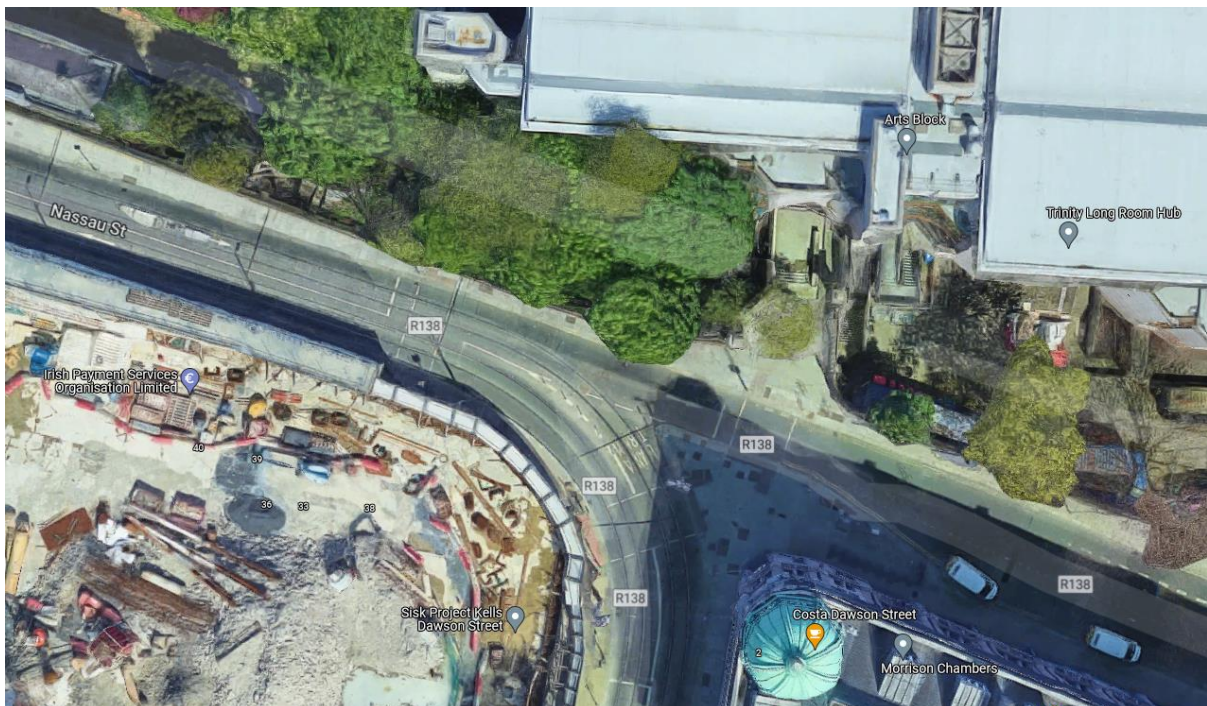
ii) Junction of Pearse St and Westland Row.
Oliver Goldsmith and Trinity Biomedical Sciences buildings have lecture theatres in them with high occupancy and in the case of TBSI many UG laboratories so lots of student/staff mobility on foot at lecture or laboratory interchange time mixing with Pearse Station commuters. Many pedestrians are forced to step into the road in order to get by, particularly when others are waiting for a green-man light change at a pelican crossing.

18. For SMT31 ('Street and Road Design'), we suggest the reference to "To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users" is changed to reflect the DMRS Hierarchy of Road Users, where the needs and safety of walkers, cyclists and public transport users are prioritised over private car drivers. We believe references to 'balance' do not reflect such a hierarchy.

19. For SMT032 ('Environmental and Road Safety Impacts of Traffic in the City') we suggest a review of provision for cycling along Pearse St, particularly along the rail bridge sector. Pearse St has a bus lane plus three GVLs. Buses, coaches and taxis often travel at high speed in the bus lane, which makes it an unwelcoming place to cycle. Futhremore, we suggest more detail relating to the goal "To support programmes of action which tackle the issue of road safety in the city."

20. SMT01 lacks clarity. Trinity currently has 14% cycling modal share despite the lack of safe, segregated infrastructure. Trinity would like to see ambitious, specific goals for cycling and to see safe, segregated, continuous cycle lanes to support it.

21. Trinity welcomes SMT07 and thanks Dublin City Council for their work during COVID-19.

22. SMT08 states that Dublin City Council plans "to create protected cycle lanes, where feasible." What does "where feasible" mean? Trinity would like the plan to state that protected cycle lanes will be prioritised over cars and public transport. That statement would align to the design manual for urban roads and streets and the many statements in the plan in support of the need for cycling infrastructure.

23. SMT19 aims to promote walking and cycling in schools. Trinity would welcome a similar scheme for third level institutions.

Trinity is pursing a Bike to College Scheme like the bike to work scheme. Details here. Trinity would very much welcome support for this idea from Dublin City Council.

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