



## Response to National Transport Authority Greater Dublin Area Transport Strategy 2022–2042 Consultation

Date: 7<sup>th</sup> January 2022

### Summary

The NTA GDA Transport Strategy is a wide-ranging, progressive strategy which Trinity welcomes. We thank the NTA for their work and make a number of comments summarised below.

- Trinity would like this action plan to be implemented as a matter of urgency given the current biodiversity and climate crisis.
- Trinity is frustrated at the delays in big transport projects to date e.g. Metro Link and light rail extensions.
- Trinity has responded to the Strategy with a focus on the [four priority routes](#) between our campuses: Trinity Hall to College Green, on Pearse Street, on Nassau Street and from College Green to St. James's Hospital. Other routes of importance to Trinity include College Green to Santry and College Green to Iveagh Grounds.
- Trinity would like more focus on civic spaces, particularly College Green, and would like biodiversity to be considered in all changes to the built environment.
- The Healthy Ireland Framework is an all of government initiative that sets goals across all departments. Given how important transport is, could a similar approach be taken for this strategy? Trinity is concerned that delivering the strategy will be delayed by lack of political support.
- Trinity is pleased to see the Strategy state that car-centric urban environments have a disproportionately adverse impact on certain groups. Trinity would like children added to the list of groups adversely affected. Trinity would also like wording that states cars will no longer be permitted to dominate the urban environment.
- Trinity is disappointed by the lack of detail on cycling and would like the NTA to consider the recent EU Commission decision which recognises cycling as well as other active modes as a priority for moving people in cities/towns.

### General points:

- **Engagement:** Trinity feels the public is missing from the Plan. Opportunities to reimagine the built environment and be partners in change should be increased. This sort of ongoing capacity building is important for inspiring and sustaining change.
- **Editing:** While a minor thing, the section numbering in the Executive Summary is different from the section numbering within the main Strategy (e.g. Section 7 in the Executive Strategy is actually Section 8 in the Strategy).
- **The consultation process:** The consultation platform restricts submissions to chapters. A facility to give general comments is needed.

### Trinity's Feedback on the Strategy

#### 1. Chapter 3: Strategy Challenges

**3.2 Climate Change:** One of the "three main actions" appears poorly worded: "Increasing use of public transport, walking and cycling and a reduction in trips by car." This could read: Increasing use of public transport, walking and cycling and *reducing car use*. The latter wording is also more

consistent with the subsequent statement, "To this end this report sets out the scale and the strategic-level detail of the investment required to facilitate a *reduction in the use of the private car* in the GDA over the period to 2042."

**3.6 Transformation of the Urban Environment:** We welcome the recognition of the need to transform our urban environment. Given that only 1% of Trinity's community travels by car, the car-centric design of our urban environment is detrimental to our students and staff.

"This has a disproportionate adverse impact on persons with disabilities, *children*, the elderly and the socially disadvantaged" - reference to children needs to be added here. Our urban environment is currently completely hostile to children as well as those with accessibility needs. We also note that the word "children" appears only 6 times in the strategy document. Children constitute ~20% of Ireland's population and travel to school 5 days per week - they should be a **primary** consideration in any Transport Strategy.

"Reducing" car dominance is insufficiently ambitious as an aim, since any reduction could be considered a success. Recommend rewording so that it is clear that cars will no longer be permitted to dominate - through the facilitation of modal shift.

Trinity welcomes the inclusion of the movement of goods vehicles. HGVs (particularly semi-trailer rigs) are the most likely vehicle to injure or kill cyclists and pedestrians in our city. The HGV Permit App shows that c. 50% of owners/operators are not holding a valid permit when checked. The Gardai are failing to stop drivers to check permit status. Trinity would like the NTA to call for ensuring permit compliance. Dublin City Council's Brendan O'Brien stated at the Lord Mayor's Forum for Strand Road that An Garda Siochana was the agency responsible for permit checking.

Trinity would like to see the blocking of cycle tracks and pavements by goods vehicles making deliveries highlighted. On Twitter, DublinBlockers show the issues for mobility-aid citizens and parents pushing prams/buggies. Our students/staff using mobility-aids must be able to get around comfortably both on street and when using public transport (station lifts are frequently out of service).

**3.7 Ensuring Universal Access:** Trinity welcomes the inclusion of the Universal Design approach. Coherent, safe and comfortable cycling routes to/from all of our campuses (including Iveagh Grounds, Santry, etc.) would offer safe routes for students/staff with disabilities who may choose to deploy e-mobility-aids for their commute.

### **3.8 Serving Rural Development**

Although 70% of Trinity students and staff travel [under 10km to Trinity](#), [2% travel >50km](#). Trinity would welcome better bus and train services to our campus from rural areas.

### **3.11 Delivering Transport Scheme**

Trinity is pleased to see the issue of opposition to change highlighted. Trinity would like to see sufficient funding made available to researchers and engagement specialists to provide a change-management service.

## **2. Chapter 8: Planning for Sustainable Transport**

- **8.1 Introduction:** The consequences of our overly car-dependent city-region include: air pollution *and associated ill-health* poor and *dangerous* walking and cycling environments. All of the consequences listed act as disincentives to active travel and public transport use, and exacerbate car dependence - a statement to this effect would be welcome.

- **8.2 Emerging concepts in transport:** Trinity welcomes the NTA focus on 15 minute cities and 10 minute neighbourhoods.
- **8.3 Sustainable Delivery of Housing:** Trinity thanks the NTA for their focus on transport planning with housing, and supports the NTA's prioritisation of walking, cycling and public transport. This is of particular importance to Trinity students who need affordable housing, in liveable areas. We would welcome the allocation of space to walking, cycling and public transport over cars in particular where students live. Cycling infrastructure should be protected from traffic.  
**Measure Plan1** "SDZ Planning Schemes, Local Area Plans and large planning applications should be accompanied by appropriate Transport Plans or Transport Assessments setting out how the plan or development minimises the need to travel and how public transport, walking and cycling together can cater for the majority of travel demand."

This is a key issue, but too many developments are signed-off by Roads/Transport section of Planning Division in our City without follow-up on full implementation by the developer. We only have to look at recent Trinity major buildings (TBSI, Business School) to know that bike parking, as stipulated in grant of permit, was not implemented.

**Measure PLAN14 – Reallocation of Road Space:** "The NTA, in conjunction with the local authorities, will seek the reallocation of road space in Dublin City Centre, Metropolitan towns and villages, and towns and villages across the GDA to prioritise walking, cycling and public transport use and prioritise the placemaking functions of the urban street network."

This is very important to Trinity. We strongly endorse it.

- **8.4 Consolidation of Development:** Trinity welcomes the NTA's position on out of town retail development. Trinity has 1% car use. For many students and staff, cars are not an affordable or accessible means of transport. Climate change is of huge concern to Trinity students and staff. We thank the NTA for taking leadership on this issue.
- **8.5 Transit Oriented Development:** The Biodiversity and Climate Crisis is also of major concern to Trinity students and staff. Trinity asks that wherever possible, transport infrastructure supports biodiversity.
- **8.6 and 8.7:** Trinity welcomes the NTA's focus on mixed use development and filtered permeability
- **8.9 Urban design and placemaking:** The inclusion of placemaking is welcome. Trinity would particularly like to see a focus on placemaking on College Green and on [our priority routes](#) from Trinity Hall to College Green, on Pearse Street, on Nassau Street and from College Green to St. James's Hospital. Other routes of importance to Trinity include the College Green to Santry and College Green to Iveagh Grounds. Trinity notes that the NTA has highlighted the importance of biodiversity. Trinity would like to see as much greening of the GDA as possible to respond to the biodiversity crisis. Plans to reduce car speeds to facilitate placemaking is fine but removing private cars from people centred places would be ideal.
- Dublin has no major public plaza in comparison to other capitals in the EU. We have remarkably little public green space as one approaches An Lár. With Trinity trying to restore biodiversity on its College Green campus, the NTA could compliment these efforts by supporting a public plaza on College Green. College Green has to be as green as possible and not a traffic sewer, even for buses/coaches.

- **8.11 The Road User Hierarchy:** Trinity is delighted to see the NTA's continued support of the road user hierarchy. Trinity particularly welcomes the statement: "A high priority must also be given to cyclists, because trips by this mode have a great potential to replace trips by private car, most specifically for short to medium distance trips, but increasingly for longer trips as e-bikes extend the range of this mode." Thank you. Trinity is concerned however that the following Action Measure dilutes this: **MEASURE PLAN16 – The Road User Hierarchy** The NTA, in the decision-making process around the design, planning and funding of transport schemes in the GDA, *will be guided* by the priority afforded to each mode in the Road User Hierarchy as set out in the Transport Strategy. Trinity feels "will be guided" is not strong enough. Guidance can be easily ignored.

## Chapter 9: Integration and Inclusion

- **9.1 International Gateways:** Trinity supports Dublin Port Company plans to create a safe segregated cycle track (Tolka Estuary Greenway) between ferry terminals and East Wall Road, as revealed [recently](#). The construction of a new Point Depot junction with a pedestrian/bicycle bridge (Blood Stoney bridge) near Tom Clarke bridge must happen in conjunction with this project. These are vital parts of a network to allow Trinity commuters access the new Pearse St/Grand Canal Harbour campus.

In a similar manner Trinity seeks a safe segregated route from Dublin Airport to the city centre. Trinity would like to see an initiative like Schiphol Airport's "[You can Bike if you Like](#)". Schiphol is 16kms from Amsterdam's Central Station, Dublin Airport is 10kms from Connolly Station and Heuston is 11.6 kms. Amsterdam gets more rain than Dublin. Trinity students and staff would welcome a Bike If You Like equivalent in Dublin Airport.

- **9.16 Enforcement of Road Traffic Laws**  
The offenses listed should also include: (1) Motorists speeding - speeding in residential zones and 30/50kmph zones is particularly dangerous for other road users and creates a hostile environment for pedestrians and cyclists; (2) Motorists failing to observe a safe distance when passing cyclists; (3) Bicycle theft  
"Cyclists travelling on footpaths or pedestrianised streets" should be removed. This typically occurs where there is no cycling infrastructure and/or roads are unsafe and is incomparable with the other offenses listed in terms of severity, threat posed, and frequency of occurrence.
- **9.5 and 9.6:** Trinity welcomes the revision of fare structures and next generation ticketing.
- **9.8 Behavioural Change:** It is not clear if the definition of behavioural change refers to the NTA's practice of behaviour change or of behaviour change theory in general. The Ottawa Charter, the founding document for Health Promotion, was created as a method of changing behaviour that incorporates action under five pillars, one of which is "Creating supportive environments." Promoting behaviour change without building infrastructure to support the behaviour desired, is ineffective. Would the NTA rewrite this paragraph clarifying what definition of behaviour change is referred to and stating that promotion of walking, cycling and public transport will be supported by changes to the environment as mean of achieving success?
- **9.8.1 Smarter Travel Workplaces and Campuses:** This programme has been a wholly positive experience for Trinity. Thank you to the NTA for offering it. Trinity has 1% car use because we have so little parking and we are served by almost all public transport, with the exception of segregated cycling. Whilst promotional activities are positive and engaging, our students and staff [do not feel safe](#) cycling in Dublin. Trinity would like to see safe segregated cycling on our

four priority routes: From Trinity Hall to College Green, on Pearse Street, on Nassau Street and from College Green to St. James's Hospital.

The draft strategy states: "The outcome of this programme, however, is not measured solely by the numbers of single- occupancy car trips being removed from the roads, but also by the fostering of a sustainable transport culture in places where the car had previously played a predominant role." Trinity suggests that an external review take place of this programme with particular attention paid to whether, or not, mobility management plans required by grants of planning permission are adhered to.

- **9.11 Accessible Infrastructure**

The draft strategy says: "There are many lifts in existing train and tram stations, which are essential for some passengers being able to access a platform or station building. Lifts that break down or are out of service for long periods of time cause a customer to lose confidence in being able to access that station and potentially stop them from using public transport altogether."

Trinity has some students and staff who are less able from a physical/mental perspective, but our [Disability Services](#) unit exists to help them around our campuses. It is vital that they can depend on station lifts working all the time, being able to get on/off DART trains without Irish Rail staff being present, etc.

- **9.14 Equality and Inclusivity Programme:** Trinity welcomes this initiative and would like to see infrastructure that supports equality and inclusivity too e.g. disability bike parking, safe segregated cycling.
- Maintenance is a significant barrier to integration and inclusion (e.g. elevators at DART stations) and it notes significant monies have been allocated, but it could be called out as a key opportunity within the Strategy and also within evaluation too. There is no accountability for inaccessibility and that seems odd.
- **9.15 Equality and Impact Assessment:** Trinity welcomes this Assessment and would ask that socio-economic status be included too. For many people, private cars are not affordable. The AA estimates that obtaining a driving licence costs approx. €600 and running a car is estimated to cost thousands per annum. Private cars are therefore very exclusive and many of Trinity's students can't afford to drive one. Trinity believes it is unfair to allocate so much road space to private cars. We would like space reallocated to walking, cycling and public transport, in particular on our four priority routes: From Trinity Hall to College Green, on Pearse Street, on Nassau Street and from College Green to St. James's Hospital.
- **9.16 Enforcement of Traffic Laws:** Trinity is delighted to see plans to enforce traffic laws and strongly supports NTA actions to do so. Trinity would like to see new laws that limit the size of vehicles on our roads. Trinity would like to explore the idea of cars being issued with emissions stickers that indicate the size of the engine and the quantity of pollution each car emits. Research by Irish Doctor's for the Environment, presented at a recent [Oireachtas Committee](#) highlights the many dangers of cars and the benefits of physical activity.

Trinity notes that France has just introduced a law requiring car ads to promote alternative modes of transport. See here. <https://www.npr.org/2022/01/04/1070297325/france-car-ads-climate?t=1641388212140> Trinity would like this strategy to propose the same.

Trinity would like to see markedly improved traffic law enforcement on the routes to and from its campuses for those walking or on bicycles. Far too many bus lanes, cycle tracks and

pavements are blocked by motor vehicles during their period of operation. We note that there are few if any traffic wardens still employed.

#### Chapter 10: Walking, accessibility and built environment

Trinity welcomes all proposal in chapter 10 and ask that particular attention be given to College Green, an important civic space for Trinity. Trinity would like to see greater urgency on changes to the built environment. The Healthy Ireland Framework is an all of government initiative that sets goals across all departments. Given how important transport is, could a similar approach be taken for this strategy? Trinity would like the extensive changes proposed in this document to happen urgently and is concerned that delivering the strategy will be delayed by lack of political support.

Amenities such as lighting, seating, public restrooms, public water fountains, ground-floor transparency, etc. create an accessible, enjoyable public realm but are not drawn out in the strategy.

**Section 10** focuses on maintenance of pedestrian infrastructure, but there should also be a focus on the importance of **quality maintenance**, which is badly needed throughout the Greater Dublin Area. Routine maintenance of footpaths, cycle infrastructure, trails, transit stops, and road edges must be emphasised as these have emerged as a significant concern. In addition to the maintenance of pedestrian infrastructure, additional emphasis should be added to:

- 1) assessment of the placement of utilities which currently obstruct pedestrians and cyclists too often;
- 2) assessment of the placement and types of drains used, which are often dangerous to cyclists or clogged by debris, causing flooding and slippery conditions;
- 3) routine resurfacing often exacerbates speeding by drivers, rather than incrementally improving the right of way for all road users, so care must be taken to ensure resurfacing projects advance complete corridors;
- 4) routine maintenance of hedges, regular street-sweeping and debris removal, along with drain and flood management to ensure appropriate conditions of road edges for those walking and cycling;
- 5) routine assessment and clearing of footpaths and cycleways post-storm and in areas under and near major development; and
- 6) required training for all maintenance staffs and service providers (e.g. utilities) to ensure road conditions and edges are better than how they were found, when streets are impacted by development or below-ground system upgrades. In too many instances, patching by service providers post-installation is exceptionally shoddy, creating significant challenges for those choosing active modes, those with visual and mobility impairments, seniors and children. Above-ground utilities often result in blighted neighbourhoods due to inappropriate tree trimming and removal, destruction and removal of other green features, and placement of towers and upgraded utility infrastructure out of character with the community context.

**10.6 Pedestrian Crossings:** "As such, the time spent waiting for the pedestrian phase may also need to be reduced." The word MAY should be removed so that the end of the sentence reads "**needs** to be reduced." One of the primary stated actions to be fulfilled by this strategy is a reduction in car dominance. Key to achieving this is giving pedestrians priority. The text states "and a balance is



required to ensure the needs of all modes are met." But a *balance* is not what is sought here, per the strategy's stated aims - we need a modal shift.

### Chapter 11: Cycling and Personal Mobility Devices

This section says nothing about a commitment *specifically* to safe, fully segregated, fully connected cycling infrastructure, despite highlighting the fact that the overwhelming majority want this and say it would help them to cycle more!

"69% would find more cycle tracks along roads, physically separated from traffic and pedestrians useful to help them cycle more."

"84% of residents also support building more physically separated on-road cycle tracks, even when this would mean less space for other road traffic."

Throughout this section, "Cycle Network" is entirely vague - especially since it is considered to be in existence already. This section should spell out what a cycling network is. Overall, a disappointing section - to achieve aims of 51% reduction in GHG emissions, cycling should be prioritised in this strategy

This recent EU Commission decision under its Urban Mobility Framework (UMF) recognises the primary role of cycling and other forms of active transport in moving people in cities/towns. <https://ecf.com/news-and-events/news/ecf-analysis-new-european-urban-mobility-framework-major-win-cycling>. Trinity would like to see this decision incorporated into the Greater Dublin Area Transport Strategy.

The ECF [states](#) in its response to UMF (22 Dec 2021): We also applaud the Commission's emphasis on mobility as "a critical aspect of social inclusion and an important determinant of human well-being, especially for disadvantaged groups," and that transport is "an essential service in the [European Pillar of Social Rights](#)."

Trinity would like the protection of COVID19 measures – Nassau Street contraflow cycle track, etc. Trinity is concerned by the statement "It is inevitable that not all temporary measures will be retained via the formal planning process but the change in mentality as to what is possible for cycling must be harnessed and built upon over the coming years to deliver the step-change in facilities that is being demanded". While there has been a number of high quality schemes delivered across the region, such as along sections of the canals and on some key radial routes, the requirement to deliver a coherent network linking origins and destinations and catering for trips within communities and to schools remains. The need to deliver this comprehensive network has become even more apparent during the Covid-19 pandemic.

This is a crucial issue. There is no safe, segregated and comfortable cycling route between the main campus and any of the other Trinity campuses.

Holding onto what we gained under COVID19 emergency measures is vital – The Nassau St. contraflow, for example.

- **11.3 GDA Cycle Network:** Figure 11.1 - Where is this? What do the different coloured roads correspond to here? Legend/key needed.
- **Measure CYC1 – GDA Cycle Network:** "It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, **fully connected**, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network.

The "network" such as it can be said to exist is completely piecemeal and disconnected. Any network must be fully connected. This needs to be built into the design. Cycling any distance in Dublin can only be done by expert road users - certainly not children, the elderly, or anyone with accessibility needs.

The draft strategy states: "It is the intention of the NTA and the local authorities to deliver a safe, comprehensive, attractive and legible cycle network in accordance with the updated Greater Dublin Area Cycle Network". Trinity would like to see a timeframe for the different elements of this network and a funding stream clearly set out.

- **Measure CYC2 – Cycle Infrastructure Design:** "It is the intention of the NTA to ensure that cycle infrastructure in the GDA provides an appropriate quality of service to all users, through the implementation of the design guidance contained in the latest version of the National Cycle Manual." The National Cycle Manual contains guidelines that are out of step with international best practice, resulting in unsafe infrastructure being implemented - which is counterproductive and an enormous waste of money.

In revising the manual, the NTA must attend to the best international examples of cycle design, including: <https://www.sustrans.org.uk/for-professionals/infrastructure/walking-and-cycling-infrastructure-design-guidance> <https://dutchcycling.nl/en/news/blog/5-design-principles-for-successful-bicycle-infrastructure>

- **11.4 Cycle infrastructure design:** Trinity welcomes the focus on gender but is disappointed by the lack of specific details on cycle infrastructure design. The document refers to personal security concerns on green ways but does not refer to personal safety concerns while commuting, a concern regularly raised by women and men in Trinity. Trinity asks the NTA to focus on making commuting by bike safe for all as a matter of urgency.

Trinity asks the NTA to review and respond to our cycling injury research, [link here](#) which found that, *"side to side impacts, impacts between the front of the cyclist/bicycle and the side of the vehicle, and impacts with open(ing) doors emerge as important impact configurations with the inclusion of self-reported cases. For single cyclist collisions, the importance of loss of traction of the tyres due to slippery road conditions and interactions with tram tracks and kerbs are emphasised."*

Trinity would like to see rail groove composite inserts at Luas track crossing-points to make it safer for cyclists to cross the tracks - at College Green, in particular

There are opportunities to identify safe, secure, and sheltered bicycle parking within the Strategy. It appears missing throughout.

Trinity notes that the Netherlands has installed a rainbow cycle lane.

<https://nltimes.nl/2021/06/09/video-utrecht-get-worlds-longest-rainbow-bike-path> Could Dublin have similar?

**Page 97:** Why is 12% the projected total mode share for bicycles by 2042? It would be useful to hear from researchers on the appropriateness of this figure and how it is presented. Should



there be targeted areas for mode shift (e.g. increased % tied to equity or equality elements) rather than the general number for across Dublin? Is the figure appropriate or too conservative?

Trinity would like to see a revision of the National Cycle Manual (NCM) in tandem with Design Manual for Urban Roads & Streets (DMURS) & Transport Infrastructure Ireland (TII) design manuals/guidance in relation to provision for cycling. Each guidance manual should be singing-from-same-hymn sheet! Design of cycle tracks must be suitable for the wide range of types of bicycle, e-scooters and mobility-aids in use these days – cargobikes, handcycles, standard bicycles with big boxes on front/rear carriers, etc.

- **11.5 Cycle Parking:** A reduction in car dominance and genuine effort to reduce car use requires that cycle parking, along with car parking for individuals with accessibility needs, should be prioritised. This should include parking suitable for all bikes, including cargo.

The section on *Car Parking* (14.11) includes a section on *Car Parking Standards* (14.11.2). In the Bicycle Parking section, an equivalent section *Cycle Parking Standards* needs to be added.

Section 11.8 recognises ebikes as an emerging Personal Mobility Mode and in Section 8.11 for longer trips. In the *Cycle Parking Standards* section, specific mention needs to be made of bicycle parking for ebikes. As they are an electric device with a battery, much like a laptop or mobile phone, they cannot be left out all day every day in inclement weather and particularly in frost and rain. Providing sheltered facilities for cycle parking; at Park and Ride facilities, at train and Dart stations, Luas and more rural (Enniskerry is a great example of sheltered bike parking beside a bus stop on the edge of the village) bus stops and in urban centres, as part of a designated section on *Cycle Parking* and encouraging integrated transport choices. (and a commitment to *Cycle Parking Standards*)

Trinity thanks the NTA for its continuing provision of funds to upgrade and expand its bike parking provision.

- **11.7 Bikes on Public Transport:** "As such, all Irish Rail services using newly procured fleet, including new DART fleet, will accommodate a minimum of 4 bicycles per train, in addition to an unlimited number of folding bikes." This is not enough - it should be 4 bicycles per carriage. Again, a lack of ambition.

Trinity would like the NTA to consider front bike racks for buses - as employed in e.g., the Pacific Northwest USA e.g., <https://kingcounty.gov/depts/transportation/metro/travel-options/bike/loading-unloading.aspx>

The NTA states the Luas is "unsuited for carriage of standard bicycles on board". Trinity does not agree with the NTA/TII position. We observe bikes carried on on-street tram services in cities across the EU. On those services there are fixings within the car or a storage area at the end of the tram set in which to store bike. Bikes are held in place using Velcro-straps.

- **11.8 Emerging Personal Mobility Modes:** Cargo bikes should be included here.

- **Bike to College Scheme:** Trinity made a commitment in [this submission](#) to Dublin City Council to lobby for a Bike to College Scheme. Trinity would like to see a Bike To College scheme for students like the bike to work scheme. Details [here](#).

## Chapter 12: Public Transport

Trinity has made multiple submissions in support of Bus Connects and welcomes all of the proposal in Chapter 12.

Trinity is frustrated at the delays in big transport projects to date e.g. Metro Link and light rail extensions. Trinity would welcome high capacity rail infrastructure between Trinity, UCD, DCU and TUD.

**Ambitiously Reaching Desired Outcomes:** Trinity would like to see an emphasis on free public transport for all people under the age of 17 as an ambitious strategy to cultivate appropriate behaviours for life and make progress in modal shift, with ongoing reductions for students. Or even encourage free public transport on holidays / weekend services – things to encourage modal shift – as well as allocation of resources to open streets, create demonstration projects, evaluate interventions, encourage community involvement.

### 12.2 Bus

- **Measure BUS1 – Core Bus Corridor Programme**

“Subject to receipt of statutory consents, it is the intention of the NTA to implement the 12 Core Bus Corridors as set out in the BusConnects Dublin programme”. Some of these CBCs will service Trinity staff and students commuting to campus by bus/coach and bike. Thank you for your work on them.

Cycle tracks installed along bus corridors should be of a minimum width to international best-practice. We note that some tracks are dimensioned at 1.5m – this is too narrow for cargo-bikes.

- **12.2.6 New Bus Stops and Shelters:** Trinity would like green bus shelters that support biodiversity.

## Chapter 13: Roads

Trinity would like a comparison of the cost of road building and maintenance to the cost of building and maintaining other transport infrastructure.

Please Emphasise safe, **comfortable** roads for all users.

Trinity notes the Transport and Environment report, 2021 which states: “With many conventional cars becoming SUVs, the trend is passed onto the EV market. Half of EV sales are now SUVs, due to the shift in the conventional car market fed by an auto industry seeking to maximise profit. Instead of tackling the issue of weight and size, resulting in more emissions and more materials, manufacturers are increasingly opting for bigger.” Trinity would like to see limits place on car size and emissions.

During 2021 more than 175,000 drivers were detected committing speeding offences and more than 23,000 were found to be using a mobile phone while driving. Trinity would like to see enforcement of all rules of the road.

## 13.6 Urban Roads and Streets

A safe segregated cycling route on Trinity's [four key routes](#) is needed.

### Chapter 14: Traffic Management and Travel Options

Trinity welcomes measures to reduce parking including public sector parking in Dublin City Centre.

Variable Speed Zones could include Safe Routes to School Zones and peak school times too.

- **Page 174+. Parking Standards:** In addition to the number of spaces, the placement of parking in front of homes wastes huge amounts of space in most developments, which could provide housing options and rental income. There appears to be no encouragement of the use of alleys or rear parking to encourage the construction of small homes / accessible accessory dwelling units or larger gardens for those who don't want/need parking, while managing refuse collection more effectively. Parking maximums rather than parking minimums is the right way to go. Where is the focus on bicycle parking though?
- **14.11.1 Car Free Residential Developments:** states: *"In providing for car-free developments, the two key considerations will be the level of mobility that can be offered to future residents by the transport network in terms of public transport and the provision of high-quality cycle infrastructure, and the potential for adverse effects of overspill parking on neighbouring residential roads and streets."* Provision of high quality cycle infrastructure and bicycle parking are symbiotic. Not everyone can store their bicycle at their home and older residential developments may not have lifts or underground bicycle parking. This section needs to name bicycle parking as the third consideration or state that 'high-quality cycle infrastructure' includes bicycle parking. Of note, there is a heading titled *Residential Car Parking Standards* (14.11.2) and a Table (15.1) setting out maximum parking provision. There no heading on *Residential Bicycle Parking* or the equivalent Table or Targets. *Residential Bicycle Parking* and the equivalent Table and Targets should also be considered for inclusion.
- The draft strategy states: "Every mode of travel needs to be accommodated in some form in order to ensure that the needs of residents, businesses, workers and visitors are met. These needs, however, must be balanced in a way that favours sustainable mobility and the transition to a zero-carbon transport system, and the level of accommodation of each mode will not be equal on every road and street."

Provision for safe/segregated cycling infrastructure is Trinity's priority. We have very high cycling mode share.

Again Trinity would like to emphasise the importance of College Green to our university and the approaches to it – Dame St/Pearse St. Nassau Street and other routes.

- **14.4 Reduced Speed Limits:** Trinity strongly supports 30 km/h speed limits in Dublin and particular on Pearse Street which is very hostile to walking and cycling.

### Chapter 17: Strategy Outcomes

- **17.2.7 Mode Share:** These are disappointingly unambitious targets for mode share. Projects usually suggest 3 levels of target:
  - o Minimum required (currently stated) - what absolutely must be achieved
  - o Target - more ambitious
  - o Stretch goal - most ambitious

- **17.3.4 Safety:** Trinity would like the NTA to aim for zero pedestrian and cyclist deaths - this should be part of the framing of this strategy. It has been achieved in other countries - let's look to their example. <https://www.wired.co.uk/article/oslo-pedestrianisation>
- **17.4.3 Trips to Work:** This section (and the entire document) is silent on the Cycle to work Scheme, which arose out of the NTA Smarter Travel Policy 2009. Trinity has partnered with the National Transport Authority as a Smarter Travel Campus since 2011. The authors of the document – the National Transport Authority -operates under the aegis of the Department of Transport. According to the Irish Times, a Department of Transport spending review [here](#) found there are no official figures on the scheme uptake or cost. (An ebike scheme was introduced in August 2020) <https://www.irishtimes.com/opinion/editorial/the-irish-times-view-on-the-bike-to-work-scheme-1.4734909> Trinity would like to see a reference to the Cycle to Work scheme in this section, and (say, under Section 19.2 *Sources*) a commitment to work with the Department of Transport to gather the data on the scheme as part of the measures, indicators and monitoring of the impact of the 2022-2042 Strategy.

## Background

**About Trinity:** 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<sup>1</sup>.

**Trinity's partnership with the NTA:** Trinity has partnered with the National Transport Authority as a Smarter Travel Campus since 2011. Through that partnership, data capture with the National Transport Authority has identified Trinity as a global leader in sustainable transport use with only 1% of our students and staff commuting by private car<sup>2</sup>. Trinity has participated in the National Transport Authority's annual walking and cycling challenges with participation of greater than 100 people every year. In 2019, Trinity participated in the National Transport Authority's Smarter Travel awards with one group of our students and one of our lecturers winning an award. Partnering with the National Transport Authority on the Smarter Travel Campus initiative has been a very positive and enjoyable experience and we look forward to continuing to do so.

**How Trinity is supporting #LiveableDublin:** 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?"<sup>3</sup>. Trinity made a submission to Dublin City Council on travel during COVID-19 restrictions calling for wider footpaths and safer cycling<sup>4</sup>. We

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<sup>1</sup> <https://www.tcd.ie/corporate-services/assets/pdf/annual-report-2018-2019.pdf>

<sup>2</sup> <https://www.tcd.ie/healthytrinity/travel/Stats.php>

<sup>3</sup> <https://www.tcd.ie/healthytrinity/liveabledublin/>

<sup>4</sup> <https://www.tcd.ie/healthytrinity/assets/documents/Covid-19/TCD%20DCC%20Covid%2019%20Submission%20Final.pdf>

were ranked as the top 'Green' University in 2020<sup>5</sup>. Trinity believes this work demonstrates that we are committed to working for and with the city to make Dublin more sustainable and liveable. During COP26, Trinity signed this letter urging governments to boost cycling levels.

<https://cop26cycling.com/>

### How people travelled to Trinity pre COVID-19

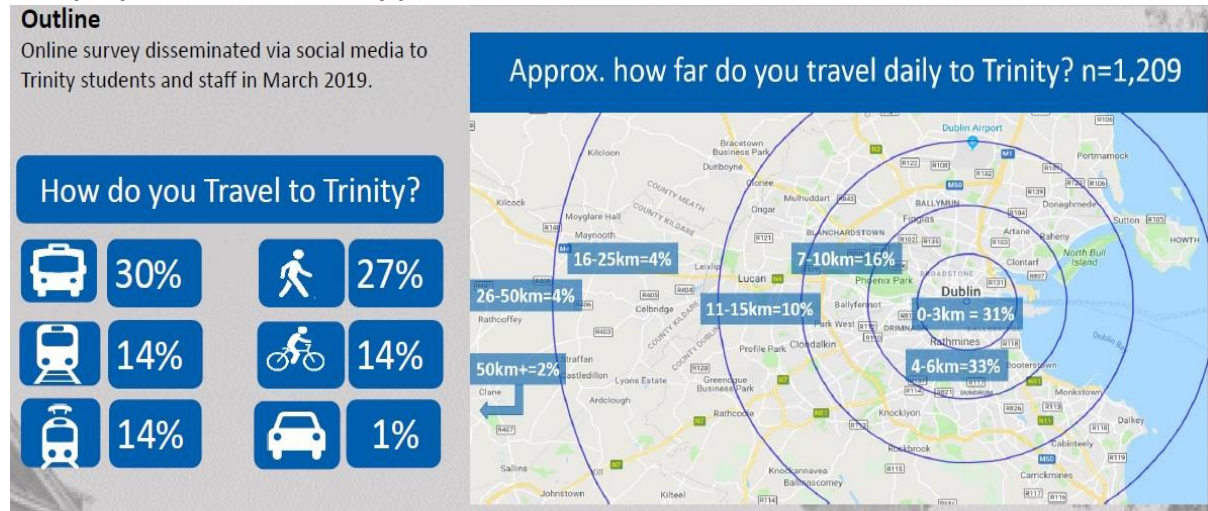


Figure 1. Shows how Trinity students and staff travelled to campus in March 2019

Trinity is a global leader in sustainable transport use. We are lucky, due to our location, to be served by all forms of public transport except safe, segregated cycling.

**Completing this document:** Trinity notes the primary ongoing and to be completed transport projects for the GDA:

- On-going roll out of cycle tracks and greenways
- Metrolink and DART+ Programme; and
- Investment in bus priority and bus service improvements – BusConnects
- Proposed Luas extensions

We thank the NTA for their progress on these schemes and welcome this review of the Greater Dublin Area Transport Strategy.

#### Contact Details

For questions/comments on this submission please contact:

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Clodagh Colleran Administrative Officer School of Medicine	

<sup>5</sup> [https://www.tcd.ie/news\\_events/articles/trinity-wins-best-green-campus-award-2020/](https://www.tcd.ie/news_events/articles/trinity-wins-best-green-campus-award-2020/)