

Response to Draft Dublin City Centre Transport Plan

Summary

Trinity welcomes the [Draft Dublin City Centre Transport](#) plan and sees it as ambitious, progressive and urgent. We thank Dublin City Council for their ongoing efforts to make Dublin a liveable city. Trinity's response to the Plan takes into account Trinity's priorities under: operations; transport; biodiversity, climate and health; and equality, diversity and inclusion.

1. **Urgent:** Trinity would like this action plan to be implemented as a matter of urgency given the current biodiversity and climate crisis and reductions in walking and cycling to campus since 2011.
2. **Priority routes:** Trinity has responded to the Strategy with a focus on the [four priority routes](#) between our campuses: Trinity Hall to College Green, Pearse Street, Nassau Street and from College Green to St. James's Hospital. To date Trinity has made [11 public consultation submission](#) on these priority routes, hosted multiple civic engagement events to promote a [#LiveableDublin](#) and upgraded over 1,000 bike parking spaces on campus.
3. **Operations:** Trinity is concerned about potential restrictions to access through Lincoln gate. Given Trinity is a working campus in the city centre, the Lincoln gate is the only practical entrance for service traffic which needs access Trinity's College Green campus throughout the day. Trinity also has multiple construction projects of varying scales in train and will continue to do so for the foreseeable future. These projects require heavy trucks to access the College Green campus through the Lincoln gate. Third parties when tendering for building contracts with the university, already find our College Green campus difficult to access which can increase the price point for the jobs at hand and in some instances cause companies to refuse to tender.
4. **Operations:** It is imperative that the suggestions in Section 18 of the Draft (The City for Business) are honoured as the changes proposed at Lincoln Gate should in no way make it more disruptive or add time to third parties accessing our site.
5. **Operations:** Trinity would like to better understand what other routes from the North side of the city will be available given proposed changes to the Westland Row route which may force trucks and delivery vehicles coming from the northside of the city to have to circle Merrion Square to gain access through Lincoln gate.
6. **Transport and Health:** 69% of people commute to Trinity via public transport, which is a welcome increase from 49% in 2011. However, walking and cycling to Trinity have both declined significantly since 2011. Walking has reduced from 28% in 2018 to 20% in 2023. Cycling has decreased from 22% in 2011 to 9% in 2023. Trinity urges the immediate implementation of this Plan which we believe will support more students and staff to walk and cycle to campus, resulting in improved mental and physical health.
7. **Biodiversity and Climate Action:** Trinity would like to see as much biodiversity as possible added on Trinity's four priority routes and throughout the city.
8. **Equality, Diversity and Inclusion:** The Plan is inclusive of those who are currently registered with our disability service, although with Trinity's aim to increase the number of staff and students with disability, accessible transport must include consideration of all disabilities (visually impaired people, deaf/hard of hearing people, neurodiverse, etc). A universal design mindset and co-creating best responses with disabled peoples' organisations (DPOs) would be critically important. Trinity welcomes how inclusive of people on low income the Plan is.

9. **Pearse Street:** Trinity welcomes the changes proposed to Pearse Street and asks how will greening, segregated cycling and protection of cyclists and pedestrians be added to the new layout. Trinity also raises a question about safety of pedestrians and cyclists at the Pearse Street and Westland Row junction.
10. **Nassau Street and Lincoln Place:** Trinity welcomes the changes to Lincoln Place but has some reservations as noted in (3) to (5) above. Trinity would like to see Nassau Street included in the Plan.
11. **College Green:** Trinity welcomes the proposed changes to College Green. We would like to see more biodiversity added on College Green as well as wider footpaths and segregated cycling on Dame Street.
12. **George’s Street:** Trinity would like to see George’s Street included in the Plan.
13. **General comments:** Trinity would like to see the Plan highlight the health benefits of its implementation, prioritise active travel of sustainable travel, set more ambitious targets for walking and cycling, and celebrate success stories to date like Dublin City Council’s recent Suffolk Street transformation.

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Operations in Trinity's College Green campus

Trinity is the largest trip attractor in Dublin City Centre. The majority of our 20,000 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 906 on campus student beds on College Green/Pearse Street, approximately 2 million visitors per year of which c. 1 million visit the Book of Kells exhibition and multiple cafes and gift shops which are 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 1,800 beds a night across our College Green (910 beds) and Trinity Hall (924 beds) campuses. Trinity's response to this plan is framed in the context of operating a very busy campus with a complexity of users and needs.



Picture 1: Trinity has upgraded >1000 bike parking spaces on campus since 2018

As noted in sections (3) to (5) above, The College Green Campus plays a significant role in the daily life of the university; 24 hours a day, 7 days a week, and 52 weeks a year!

It is important to us that Trinity plays its part in the creation of a more sustainable city, but in doing so, it is reliant on the wider supporting infrastructure of the city and beyond. We therefore request as a key stakeholder, that the university is involved with the development of the City Centre Freight, Service and Delivery Plan and other important initiatives which will change how logistics in the City are managed.

In terms of micro-consolidation centres, the university has worked with UPS in hosting such facilities and can offer valuable feedback with UPS as to how that has been delivered.

It is important that future consultation on the development of a City-wide logistics strategy involves the major building contractors who work in the City and have first-hand experience of creating logistics strategies to service their clients' projects, partly as a necessity, due to the site restrictions that many currently experience.

We understand the need for the HGV management strategy, but again request that Dublin City Council undertake further consultation on it. For example, discussions with tower crane hirers would determine if the individual crane elements can be transported on trailers which are not powered by euro class HGVs.

Transport to Trinity in 2023 compared to pre-COVID-19 travel

In April 2023, the [Healthy Trinity Smarter Travel](#) group, as part of [Trinity Sustainability](#) and the National Transport Authority's [Smarter Travel Campus](#) initiative took its sixth survey since 2011 on travel to Trinity. Further details [here](#) and in figure 1. Since COVID-19, public transport, walking and cycling continue to be used by 97% of students and staff travelling to Trinity's College Green campus. Distances travelled have increased since 2019 with 31% of students and staff travelling greater than 10km to campus.

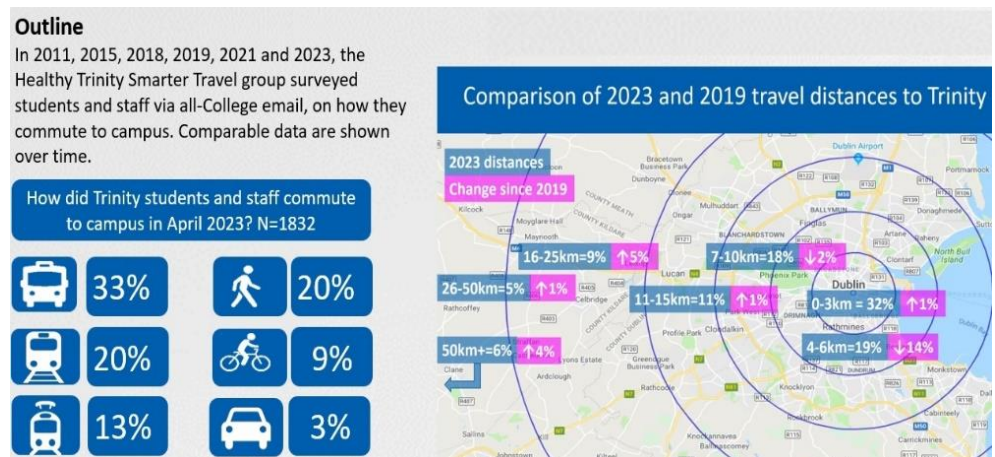


Figure 1: 97% of students and staff walk, cycle or take public transport to Trinity. Commuting distances are longer after COVID though 69% live within 10km of campus

Trinity supporting a #LiveableDublin for biodiversity, climate and health

Trinity Sustainability's vision is for Trinity to be a university, a place, and a community where climate change and biodiversity loss are addressed in a holistic, integrated and health-focused way. We aim to tackle climate and biodiversity challenges through our educational programmes, our research and innovation, and our day-to-day operations, both within Trinity and in partnership with external collaborators and communities.

As part of Trinity's NTA Smarter Travel partnership, Trinity has measured commuting to campus since 2011. In 2018, Trinity identified a 37% [reduction in cycling to campus](#) and since then, has pursued safe, segregated cycling on [four priority routes](#) that link Trinity's campuses and residences. A comparison of Trinity's survey data since 2011 is shown in Figure 2.

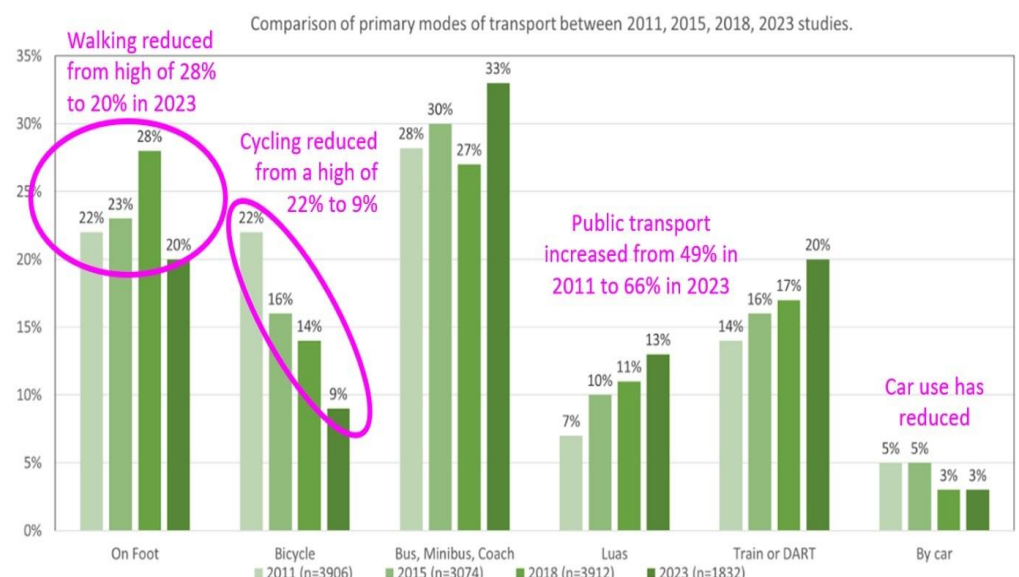


Figure 2: Public transport commuting to Trinity has risen since 2011 by 17% but walking and cycling have declined

Whilst increases in public transport use are welcome, reductions in walking and cycling to campus are disappointing from a health perspective as the [World Health Organization](#) recommends active commuting as a priority means of promoting physical activity. Trinity students and staff were asked during COVID-19, if they could have any form of transport to commute to campus, what would they choose (Caulfield et al,

2021). Students were mostly likely to choose walking to campus and staff were most likely to choose cycling. Both [Healthy Dublin City](#) and [Healthy Trinity](#) align to Healthy Ireland and Trinity would like to continue to work with Dublin City Council to promote a [#LiveableDublin](#) with particular focus on walking and cycling.

Since 2011, Trinity has worked with partners in Dublin City Council and Civil Society to host the [#LiveableDublin](#) series incorporating biodiversity, climate and health action. For example, Trinity’s School of Civil Engineering hosted the [Cycling and Society symposium](#) in 2023, Trinity Sustainability hosted the [Green Week Transport Forum](#) in 2022 and Healthy Trinity with Dublin City Council hosted a Liveable Dublin [Lunchtime Lab](#) in 2019. In 2023, Trinity was a founding member of the [Green Pearse Street](#) campaign.

Turning the Champs-Elysées into an extraordinary garden – an iconic illustration of Paris policy



Picture 2: An example of a #LiveableDublin event hosted by Trinity asked could O’Connell Street be an extraordinary garden like the Champs-Elysees?

Trinity’s response to the Dublin City Centre Transport Plan is framed in the context of Trinity’s transport, biodiversity, climate, health and civic priorities.

Equality, Diversity and Inclusion

190 respondents in the all-university survey indicated they currently have disability status in Trinity and the modal use patterns of those respondents are the same as for those who indicated they do not have disability status ($n=1,244$). The response from those with current disability status therefore is small. Trinity aims to employ 6% of staff with disabilities by 2025 and in 2022/2023, 10.8% of the student population applied for reasonable accommodations through the Disability Service ($n=2312$ students) in Trinity. It is important that accessible transport include consideration of all disabilities (visually impaired people, deaf/hard of hearing people, neurodiverse, etc.) A universal design mindset and co-creating best responses with disabled peoples’ organisations (DPOs) is critically important.

Preferred mode versus disability status ($n=1434$)

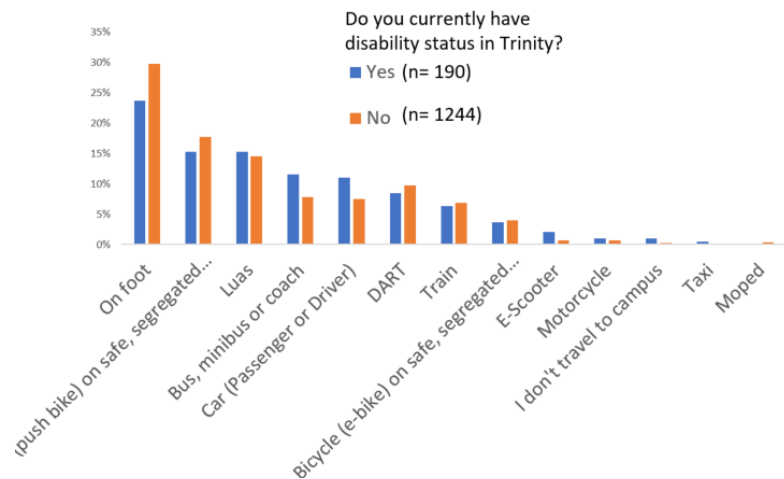
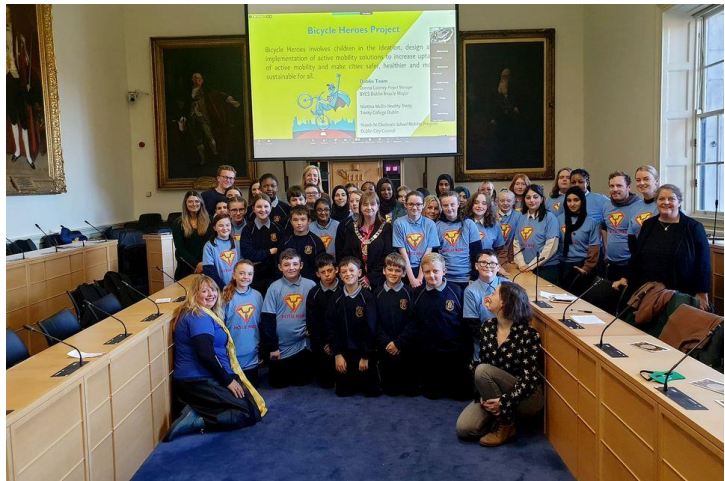


Figure 3: If all modes were available, those who currently have disability status in Trinity indicated they would like to walk, cycle or take the Luas to campus, showing the same pattern as those without disability status.

Amongst the 190 respondents, a chi-square test of independence found no significant difference in modal preference between those who currently have disability status in Trinity and those who do not. There is also no significant difference in the distances people who currently have disability status travel to campus. Figure 3 shows what form of transport people who currently have disability status would like to use to come to Trinity if all forms were available. As for those without disability status, walking and cycling and Luas are the preferred modes. These results are Healthy Trinity’s first analysis of disability status and commuting. Further research is needed.



Picture 3: Children who designed cycle lanes from their DEIS school to Trinity in 2022 as part of a DCC, Trinity partnership are pictured presenting their designs to city councillors.

Recognising how age and economically inclusive cycling is, in 2022, the Healthy Trinity Smarter Travel Group and Trinity Access Programme worked with Dublin City Council and BYCS Amsterdam to deliver the EIT Funded [Bicycle Heroes programme](#). 250 children from DEIS schools designed cycle lanes from their school to Trinity.

Trinity’s Response to the Dublin City Centre Transport Plan

Trinity welcomes the Draft Dublin City Centre Transport plan and sees it as ambitious, progressive and urgent. We thank our colleagues in Dublin City Council for their ongoing efforts to make Dublin a liveable city.

Trinity notes that the boxes highlighted in yellow in figure 4 are the areas of the plan that form part of [Trinity’s priority routes](#), Trinity would like to see these changes as urgently as possible as our walking and cycling rates have [reduced drastically](#) since 2011 and [this 2021 paper we published shows](#) there is latent appetite for walking and cycling.

CITY CENTRE PLAN MEASURES	2024	2025	2026	2027	2028	2029	2030
Traffic Free College Green and Dame Street		●	●				
Bachelors Walk Bus Gate	●						
Aston Quay Bus Gate	●						
Left-turn ban - Westland Row to Pearse Street	●						
Tara Street / Pearse Street Reconfiguration		●	●				
Liffey Interim Cycle Route	●	●					
Clontarf to City Centre Cycle Route	●						
Capel Street Formalisation	●						
Parliament Street Traffic-Free Street		●					
Gardiner Street Public Realm Enhancement	●	●	●				
Custom House Quay or Beresford Place		●	●	●	●		
Lincoln Place (Subject to assessment)		●	●				
MAJOR TRANSPORT SCHEMES							
BusConnects Service Enhancements	●	●					
BusConnects Core Bus Corridor Schemes				●	●	●	●
DART+ West and DART+ South West						●	●

Figure 4: Of the Plan measures, the areas in the yellow boxes are part of Trinity’s priority routes. Trinity thanks Dublin City Council for the planned changes in these areas and would like to see the plan extended to Nassau Street and George’s Street

We need to understand the left turn ban on Westland row to Pearse Street. We need to see where the traffic is going to go as this will severely hamper 3rd parties accessing Trinity’s College Green campus. It therefore needs to be subject to assessment also.

Pearse Street

Page 14: Trinity thanks Dublin City Council for the excellent study of car movement through the city and for creating this Plan in response to changes in Dublin since COVID-19.

Page 22: Trinity welcomes the prioritisation of public transport, walking, and cycling in the southeast quadrant of the City Centre including the major traffic change at the junction of Westland Row and Pearse Street. With the new right turn for general traffic that is to be introduced at the junction of Westland Row and Pearse Street, how will people walking and cycling on Pearse Street be protected at that junction? Trinity notes this change is planned for 2024 and thanks Dublin City Council for planning the change so soon. Trinity would like consideration of how third parties access our campus will get to the northside of the city given this new layout.

Page 22 and page 23: Trinity welcomes the plans to introduce more walking, cycling, and greening on Pearse Street and asks, how will that be designed? We would like wide footpaths, safe segregated cycling in two directions, and with as much greening and biodiversity as possible. We are very happy to support the design of that space if that is useful.

Nassau Street and Lincoln Place

Nassau Street is part of [Trinity’s priority routes](#). Trinity welcomes the changes to Lincoln Place and would like to see Nassau Street included in the Plan.

Page 42: “levelled public realm will provide vehicular access to Trinity College”– cycle access could be added here. We also think a more direct cycle access route could be integrated into plans for Lincoln Place, as this route may provide an excellent alternative to students accessing Trinity by bike, due to its wide entrance and lack of potentially dangerous Luas tracks like the ones at the College Green entrance. We would also like to understand how third party contractors will gain access to Trinity’s College Green campus through Lincoln place gate at different times of the day.

College Green to St. James’s Hospital

Page 23: Trinity is happy to see Dublin City Council reiterate the Development Plan goal to remove traffic from College Green and Dame Street from the junction with George’s Street eastwards. Trinity made a supportive submission on the [Dublin Development Plan](#) and [BusConnects](#) and looks forward to the changes on Dame Street proposed in this plan. Trinity would value the opportunity to input into the full public realm scheme for the area that will be developed. Trinity is also keen to support the opportunities along the rest of Dame Street to Christchurch for wider footpaths and improved cycling facilities.



Picture 4: Trinity supports the proposed changes to College Green pictured on page 25, thanks DCC for them and asks, could College Green be greener?

Page 25: The plans for and image of College Green look well, but can we put the green back into College Green? We would like to see more green space in this design.

1 Grafton Street: Trinity would like to better understand how vehicular access to 1 Grafton Street will be affected by the plan.

Christchurch Junction: This junction should be designed to provide protected priority to cycle traffic, as recommended in the NTA Cycle Design Manual for Central Roads with speed limits less than or equal to 50km/h.

Page 61: In November 2019, Trinity hosted a Lunchtime Lab with Dublin City Council and civil society actors that made many recommendations for changes to Christchurch place. Trinity would like the [recommendations of that Lab](#) included at Christchurch.

George's Street

George's Street is part of [Trinity's priority routes](#). Trinity would like to see George's Street included in the Plan.

General Comments from signatories of this document

Page 7: Could the health benefits of this plan be added including the World Health Organization's Healthy Cities project, to which Dublin City Council aligns: <https://www.dublincity.ie/residential/improving-my-community/healthy-dublin-city/about-healthy-dublin-city>

Page 7: The document refers to "Active Travel" and "Sustainable Modes of Travel." Given the reduction in walking and cycling in Dublin since 2011, Trinity would like to see Active Travel prioritised over Sustainable Modes of Travel throughout the document.

Page 9: Walking to Trinity is currently at 20% which is high compared to the DCC target of 13%. Trinity would like to see higher walking targets for DCC. Cycling to Trinity was 22% in 2011 but has reduced to 9% in 2023. Students are travelling further to Trinity and have moved to public transport. For mental and physical health, Trinity would like to see more ambitious targets for cycling.

Page 10: Thank you for such broad and inclusive strategy review which is a good way of representing the complexity of managing the city.

Page 10: Good to see cycling as the first strategy on this list and the cyclist dressed in day-to-day clothes rather than, for example, high-visibility clothes.

Page 13: The pictures of Suffolk Street show what's possible for streets if we implement this plan. Thank you to Dublin City Council for such a successful transformation so close to our College Green campus.

Fig.9.4.1: Plans for the South Quays clearly improve bus and pedestrian movement, however, there appears to be no observable improvement for cycle traffic relative to the existing configuration. We think that additional measures would be needed here to enhance this as an accessible space for cycling. This could include measures to reduce bus & taxi speeds to ensure compliance with 30km/h, and/or exploring the possibility of a two-way cycle-track as an alternative to one of the two bus lanes. In the Cycle Design Manual, mixed traffic cycling is not considered appropriate for 30km/h zones with >400 pcus per hour. Of course, this section would be for buses and taxis, so we accept the possibility that there would be <200 pcus per hour. However, we question how accessible and comfortable this would feel for a diverse cohort of cyclists with large buses passing on a relatively open road. Arguably there is good pedestrian connectivity between the two quays (and, relatedly, good accessibility for bus users to both sides of the Liffey), whereas this is not the case for cyclists on this section of the

South Quays, despite the density of destinations. In this way, in our view, the proposed section does not satisfy the Cycle Design Manual Principles of a Directness and Safety for the cycle network.

Terminology: We would suggest greater use of ‘protected cycling/cycle routes’ vs ‘safe cycling/cycle routes’ throughout the plan, as cycling with car traffic or bus traffic will still be prevalent even with the proposed changes (as included in this document relating to a section of the South Quays). It is important to imply that this is not necessarily unsafe (but is of course relatively unprotected).

Terminology: We suggest considering rewording instances of ‘traffic’ and its ‘removal’ more precisely as ‘car traffic’ (or perhaps ‘motor vehicle traffic’/‘vehicular traffic’). Likewise, rather than referring to ‘access’ and ‘delivery’ as general terms, we recommend these are worded more precisely, such as ‘motor vehicle access’ and ‘motor vehicle delivery’ – as appropriate. These precise wordings are important as they open up the possibilities of cycling and walking as modes providing (in many cases, potentially improved) ‘access’, and particularly cycling as a mode that facilitates ‘delivery’ (as mentioned in relation to e-cargo bikes later in the proposal). We also think it would be beneficial to use ‘cycle traffic’ (and perhaps also ‘pedestrian traffic’) across the plan in appropriate sections as opposed to ‘cyclists’/‘cycle movements’. This alternative wording helps to emphasise that this proposal enables mass transport/mobility and access through provision for cycling (and walking), in addition to place-making benefits. The emphasis on place-making is of course (rightly) fundamental to this proposal, but we believe these alternative wordings clearly communicate that this plan in fact *enhances mobility and accessibility* simultaneously (subject to modal shift), rather than being necessarily a decision between planning for place or movement. For more information on the rationale for this comment, please refer to a [recent study on active travel planning opposition](#) produced by the TCD Centre for Transport Research.

Trinity Submissions to Public Consultation

Since 2018, Trinity has made 11 submissions to public consultations on our four priority routes. This submission is our twelfth. Submissions can be viewed [here](#).

Contact Details

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