

Item No. 6

**Report to Chairperson and Members
of the Transportation Strategic Policy Committee**

Dublin City Centre Transport Study

Summary of Responses - Non Statutory Consultation Document
September 2015

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Dublin City Centre Transport Study

SUMMARY OF RESPONSES

Non Statutory Consultation Document September 2015



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council



Údarás
Náisiúnta Iompair
National Transport Authority

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1 Introduction

Dublin City Council and the National Transport Authority published the “Dublin City Centre Transport Study” on the 10th of June 2015. A period of non statutory public consultation ran initially from the 11th of June until the July 16th 2015. The consultation was extended until the 7th of August following the large amount of interest the Study generated amongst the public and interested parties.

In total, 7,779 submissions were received.

Category	Number
Online and Written Surveys	3,341
Written and Email Submissions	217
Retail Employee and Franchisee signatures	795
Cyclist Petition signatures	1,768
Taxi Driver and User signatures	1,658
Total	7,779

This Summary Report details the breakdown of the main points raised in the online surveys and the written submissions from Stakeholders. Dublin City Council and the National Transport Authority would like to thank everyone who took the time and effort to respond to this study and the numbers responding clearly show the interest which this issue has generated. It is also very positive the number of organisations who wished to meet and discuss the proposals and be part of the evolution of transportation in Dublin.

There has been considerable divergence of opinion regarding the study with in general Public Transport users, cyclists and Pedestrians welcoming the initiative proposed in the study while raising their concerns regarding safety of cycling and walking and issues with Public transport, its speed and cost of use. In addition the health benefits of the study were highlighted by the Irish Heart foundation.

The reaction particularly from the retail and hospitality sector to the proposals has been to voice considerable and grave concern regarding reducing in any way private car access to the city centre and providing estimates of 17-23% reduction in economic activity as a consequence with a corresponding loss in jobs.

DCC and the NTA are now engaging in a series of meetings with major stakeholders, business groups, hotels and interested parties in order to understand concerns raised and also examining the specific issues raised in the many submissions receive. Subsequent to this a further report will be presented to the SPC detailing responses to the issues raised and what the next steps will be in this process.

2 Survey Question Responses

3,288 people completed the online survey, 53 completed the handwritten survey (from displays in local libraries and in Dublin City Council Civic Offices). The survey had ten questions related to the study; the first nine being multiple-choice and the final question allowing comments to be submitted.

The first eight questions asked for people's views on elements of the study.

Survey Question	Yes	No	Not Sure
Do you think that reducing 'through traffic' will improve the amenity value of Dublin's city centre? (Through traffic is traffic that accesses the city centre to go to a destination not in the city centre)	81%	13%	6%
Do you support the principle of giving commuters more transport choices when they decide to come to Dublin City Centre?	93%	3%	4%
Do you think that road space for private vehicles in the core city centre should be reduced to facilitate a more efficient public transport system that has increased capacity?	78%	16%	6%
Are you in favour of high quality cycle facilities in the city centre	87%	9%	5%
Are you in favour of high quality pedestrian facilities in the city centre?	91%	5%	4%
Do you support the concept of car-free 'civic spaces' in areas like College Green and St. Stephen's Green?	79%	15%	6%
'Interchange Locations' are locations where commuters can switch public transport modes more efficiently. It is proposed to have these at locations like Connolly Station and Heuston Station. Do you support this proposal?	90%	4%	6%
Do you think you have a good understanding of Dublin City Council's Transport Policies?	49%	29%	22%

Question 9 asked "How do you normally travel to Dublin city centre?" for which respondents could select more than one option.

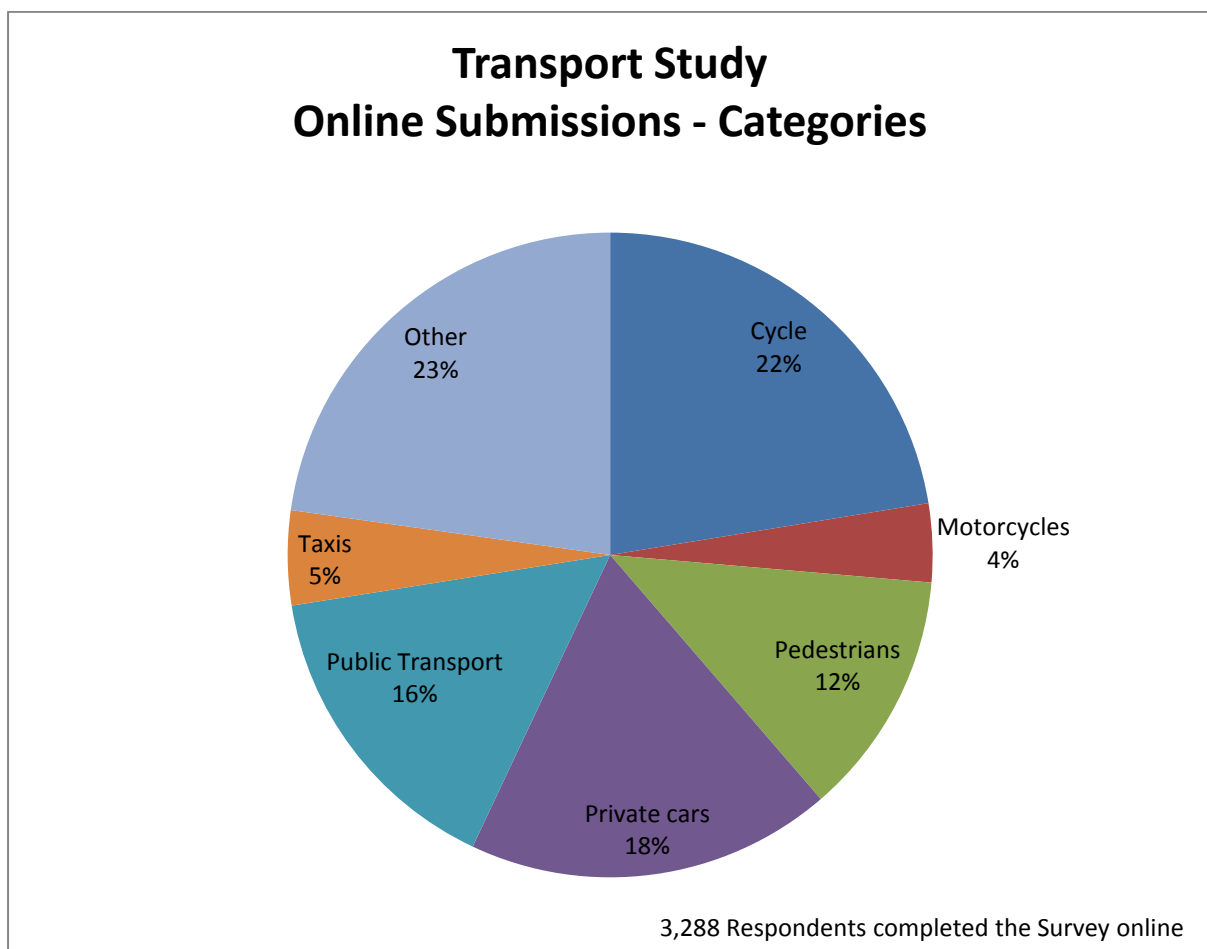
Mode	%
Public Transport	41%
Cycle	24%
Walk	17%
Private Car	16%
Taxi*	1%
Motorcycle*	<1%

**Taxi, Motorcycle and other options were only added on the 16/7/15. Respondents had previously ticked private car (for taxi) or cycle (for motorcycle)*

61% of respondents selected that they use more than 1 mode for travelling to Dublin city centre.

Question 10 asked for any further comments. Many subjects were raised in this section with a number of particular categories being raised repeatedly. These have been grouped into 7 main categories: Cycle, Private Cars, Public Transport, Pedestrians, Taxis, Motorcycles and Other.

Online Survey responses received:	Number
Online survey (English) completed	3,274
Online survey (Irish) completed	14
Handwritten survey completed	53
No. of comments (Q10) submitted	1,726
No. of issues raised in comments	2,617



2.1 Cycling

There was strong support for cycling initiatives particularly making cycling a safer and more pleasant experience. The main barriers to cycling at present appear to be concerns over lack of clearly defined cycle lanes and the safety of cyclist with people indicating they would like to cycle but they don't feel safe enough doing so and that at present Dublin especially the city centre is not a cycle friendly environment.

Suggestions as to what would make cycling more attractive include having well defined segregated cycle lanes separating cyclists from pedestrians and vehicles, cyclists not sharing narrow bus lanes with buses and taxis, clearly defined layouts at junctions so cyclists aren't forced suddenly into traffic lanes and improving feeder cycle lanes into and out of the city.

Other issues raised include parking in cycle lanes, both during and outside specified times; the pavement quality of cycle lanes; litter, glass and water ponding in cycle lanes; cycle parking, contra-flow cycling on one way streets; signal priority and crossing with pedestrians and junctions; extension of the Coca-Cola Zero dublinbikes scheme; cycling on Luas tracks and behaviour of other road users and pedestrians.

There was also criticism of cyclist's behaviour from other road users, particularly at junctions and pedestrian crossings with cycling through red signals being a particular issue and source of criticism.

Many who commented on cycle issues were in favour of pedestrian and public transport improvements.

2.2 Private cars

There were considerable concerns expressed on how commuters, shoppers and mobility impaired users will be affected by the proposed measures and how they will still be able to access the City Centre. It was also felt that the report was anti car and that the importance of the car for shopping and other activity was not reflected in the report. In addition many private users objected to having their choice of transport restricted in several areas of the city. Disabled drivers specifically raised the issues of how they would still be able to access the city centre if proposals were to proceed.

The main reason stated for people bringing their car into the city centre (particularly commuters) is a lack of alternative public transport alternatives including the lack of a bus/train/luas option. A key item which came up in a number of submissions was that it a slower option to use public transport rather than the private car, in addition the cost of public transport particularly for families was a major consideration. Some commuters indicated that if they were given a viable Public Transport option that they would transfer modes.

Users who use the city centre as a through route have said that they do so to avoid the Tolls on the M50, East Link and Port Tunnel. Concerns have been raised regarding increased congestion on other city centre roads, in the suburbs, on approaches to town and on the M50 if the proposals are

implemented and traffic is diverted onto other routes as well as how traffic will in future travel north/south (and vice versa) if changes are made.

For private car users who mainly drive for shopping and leisure reasons, there are concerns about access to different parts of the city and various car parks and it was felt that there was a clear need for information about how to access city centre car parks Hotels etc.

Other concerns raised include access for residents; Restrictions on private cars shouldn't apply in the evenings/at night and the behaviour of all road users needs to improve.

A lot of the responses though did emphasise that reducing private car traffic in the city centre, especially through traffic, would greatly improve the environment in the city centre and redress what some perceive is the bias for car traffic over other modes.

2.3 Public Transport

There is strong support for improvement to public transport. Many commented they would consider taking public transport instead of cars but are put off by the cost, journey times (faster by private car) and reliability. Public transport costs is also considered too high for both commuters and shoppers/visitors particularly compared to driving and parking for families with a number of children coming in at the weekend. Many also commented on the high cost of using two or more modes of public transport (two buses, bus and Luas) etc for the one journey.

Many issues were raised relating particularly to buses including a need for more orbital routes, increased frequency; buses should run through the night or run for longer and start earlier to reflect the shift work people do; buses should be given greater priority at junctions; buses and cyclists should be separated as buses are being slowed by cyclists and parents with buggies find they sometimes have to wait for a number of buses to pass before a bus has space - easier to take a car.

Many stated that improved public transport should be in place before any restrictions to traffic come in. A large number of people responded saying that public transport needs to be improved (with no specifics given).

Other comments raised include the need for an underground system; greater connectivity between different modes; more RTPI poles, how Anti-social behaviour is off putting to people and that Georgian squares shouldn't be used as bus terminus.

2.4 Pedestrians

There was strong support for improvement of pedestrian facilities and for the College Green proposals. Many pedestrians feel that pavement widths are too narrow for the volume of pedestrians in certain areas and that wider footways throughout the city centre are needed.

Respondents suggested other areas of the city centre they would like to see pedestrianised, particularly South William St. Respondents wished to see more benches and areas to linger although concerns about anti-social behaviour were raised.

Other comments included that Pedestrians should have greater priority at traffic signal and given more green time; Cyclists and pedestrians should be kept separate and streets should have less clutter.

There was also comment on the perception that the proposals were more weighted to the south side of the city and that there was little improvements suggested for the north side of the city.

2.5 Taxis and Limousines

The main comments raised relating to taxis was opposition to a ban of taxis through College Green (comments from public and taxi drivers). There was concern on how banning taxis from this area will affect tourists, elderly and business trips. Respondents commented that the College Green ban shouldn't be 24 hours and the area could feel very quiet and people might feel unsafe once public transport has ceased for the day.

Limousine drivers have raised the issue of not being able to use the Bus Lanes in the City, this is due to the national legislation in place for Bus Lanes.

Other comments raised included Taxis should use contra flow bus lanes, and the problem of illegal taxi parking outside ranks.

2.6 Motorcycles

When the online survey was first published there was no option to select Motorcycles or Powered two wheelers as a mode of transport. The vast majority of comments (84%) concerning Motorcycles or Powered two wheelers were in relation to this. The online survey was amended on the 16th of July.

Other comments raised where that Powered two wheelers should be allowed in bus lane, will they be allowed through College Green and secure parking should be provided.

2.7 Other issues:

There were many other issues commented on in the online survey including:

- Access for deliveries
- Access for mobility impaired users
- Effect on businesses both positive and negative.
- Access to car parks
- Anti-social behaviour issues
- Trees at College Green
- The behaviour of various road users
- Park and Ride locations
- Interchange locations

3 Written and Email Submissions

217 submissions were received from Stakeholders and the Public with a number of major companies commissioning various reports from transport consultants and market research organisations. The breakdown of these is as follows:

Stakeholder Group	No. of Submissions
Hotel	8
Other Stakeholders	27
Parking	18
Political	7
Public	25
Cycling	3
Retail (excluding signatures)	24
Taxi (excluding signatures)	96
Transport	9

3.1 Retail Sector

Submissions were received from various retailers, including many of the major retailers in the city centre such as Arnotts, Marks and Spencer, Weir and Sons and Brown Thomas as well business and retail groups including Dublin Town, Dublin City Business Association, Dublin Chamber of Commerce Retail Ireland and IBEC.

Of particular note were the 795 submissions received from employees and franchisees in the retail sector, these fully supported their employer's concerns re the study and emphasised that they believed the study could adversely affect their jobs.

Major issues were raised by the retail sector regarding the following items in a number of submissions:-

- i) Study was flawed and did not integrate transport policies or respect the requirements of the development plan.
- ii) While it was agreed that new transportation solutions would need to be found and that these would result in reduced car dependency and enhanced public transport investment, many retailers did not agree that the proposed re-allocation of road space to Public Transport, pedestrians and cyclists should happen.
- iii) They did not agree that there was any requirement to close any areas to car traffic.
- iv) The study, by not differentiating between commuter and retail car traffic, was proposing restrictions on car traffic which would severely damage their economic activity.,

estimates of 17- 23% decline in turnover with a possibility of 5,000 jobs being lost in the city centre retail sector.

- v) The study was ideologically driven with the private car to be obstructed no matter what the consequences.
- vi) Lack of clarity on the statutory basis for which the proposals could be implemented.
- vii) The study fails to properly consider alternative means of reducing car use, such as a congestion charge which differentiates between commuter and shopper cars being proposed by retailers as an alternative strategy that should be investigated.
- viii) It is dangerous to assume that shoppers if they are prevented from travelling into the city centre will transfer to other modes, it is felt they will instead travel elsewhere to shop.
- ix) Difficulty in receiving deliveries in any new arrangement were also highlighted as a major concern.
- x) Some retailers did feel that there was attractive elements to the study but any restrictions on private car traffic would invariably lead to job losses and economic decline in the city centre.
- xi) The commuter traffic is also considerably increased by the number of Free civil and public service parking spaces in the city centre and that the failure to address this issue was resulting in commuter congestion.
- xii) The study did not undertake a business impact assessment to determine the likely effect of the changes proposed, this the retail sector believe is essential to be undertaken prior to any proposals being implemented.
- xiii) Issues were raised by specifically regarding sales of heavy goods to customers if car access was not allowed.

In summary the retail sector are extremely concerned that putting in place any restrictions which would make shopping by car in the city centre less convenient would have severe consequences for turnover and employment in the sector. A particular fear was that the car borne shopper would not transfer mode but instead would transfer to out of town shopping centres.

However there was support for the Transport Study proposals from some retailers, particularly the improvements to Public Transport and pedestrians and the proposals for the College Green area.

Retail Ireland also expressed this viewpoint and called for a formal commitment on behalf of DCC and the NTA to close engagement with city centre business operators and relevant representative bodies on all future aspects of the plans.

Dublin Town in their submission expressed the following key considerations:-

- *The plan lacks clarity of detail relating to many of the proposals and resultant potential impacts. Therefore DublinTown is forced to reserve consideration of same until further details are provided.*

- *The key considerations for the business community are: maintained access to car parks and hotels; clarity with regard to deliveries and the maintenance of disabled access.*
- *A business impact study, which will include a detailed assessment of likely changes to consumer behaviour, is essential.*
- *It is essential that we differentiate between peak period (predominantly commuter) traffic and off – peak (largely customer) traffic and make plans accordingly.*
- *Dublin’s public transport infrastructure gap must be filled without delay. Alternative funding streams must be considered to ensure that this happens. We cannot afford to fall further behind our competitor cities.*
- *Short term solutions such as BRT which do not meet current passenger demand let alone future demand should be abandoned. We need to focus on solutions which actually meet the needs of the people of Dublin.*
- *We have set out a number of questions in this submission that we feel must be answered to allay the serious and legitimate concerns of large sections of the business community in relation to the proposals.*
- *Dublin Town wishes to work with Dublin City Council and the NTA to explore how business concerns can be conclusively addressed.*

Dublin Chamber of Commerce in their submission raised the issues of lack of investment in transport and the risk that the proposals would adversely affect business that rely on private cars. The Chamber believes that the study provides a useful starting point but asks that further iteration of the report be prepared based on the submissions received and the issues raised. The Chamber believes that positive engagement with the business sector is achievable and welcome the commitment to date of DCC and the NTA.

Dublin City Business Association believed that parts of the vision presented in the study do represent a fresh and improved view of Dublin and that there is much to admire in the vision. However they raise the issue of the proposed taffies changes damaging business and potentially costing jobs, the DCBA would again wish to engage with DCC and the NTA in improving the city.

3.2 Car Parks and motoring organisations.

Submissions were received from many of the city centre car parks and operating companies including Q Park and Parkrite, while there was some support for a number of the initiatives in the study in general there was concern that if access to car parks was reduced and made too difficult that car users would move to other locations.

Q Park provided figures from their market research which indicate that as many as 6 in 10 of car users surveyed did not consider Public Transport as a realistic alternative to using their car.

Other market research raised concerns for the economic impact with a belief that not being able to easily access car parks will drive shoppers to out of town locations and that the Study has an anti-car bias.

Clear signage showing any new routes to car parks were identified as being necessary with additional suggestions for App based information and a clear route guidance system for car parks.

Concerns were raised regarding the impact the existing College Green Bus gate has had and the further impact of the proposed College Green arrangement , the Luas Green Line extension and future BRT and Metro North will have on people trying to access car parks.

Requests were made for Stakeholder consultation to go through any proposals in detail with affected car parks prior to any implementation of proposals.

A submission was received from the ILAC centre and Chartered Lands which raised concerns regarding the Study and the impact on BRT on the development of the area and requested that the study be withdrawn and dialogue entered into with the relevant stakeholders.

The Society of the Irish Motor industry (SIMI) in their detailed submission highlighted what they saw as a lack of provision in the study for people who were forced to use their cars for commuting as their homes were outside the reach of Public Transport. They also raised the issues of the Elderly and disabled being able to access the city centre and that improving the city should not be at the expense of young families.

They further stated that the study, while containing many excellent proposals and ideas, is unbalanced, lacking in detailed research data and disinterested in examining the underlying cause of Dublin's traffic problems.

The RIAC in their submission agreed that through traffic should be restricted but access to city centre must be maintained, they also highlighted the need to have low emission buses and the issues with taxi parking outside taxi ranks.

Toyota Ireland made a submission supporting the objective of introducing low emission zones and also of increased digital signage for parking availability and traffic conditions.

3.3 Hotels

Submissions were received from individual and groups of hotels and the Irish Hotels Federation. The Irish Hotel Federation (IHF) expressed significant concern regarding the impacts the study proposals may have on the city centre if car access is restricted. The IHF did welcome the principles and objectives of the study and the aim to remove through traffic from the city centre and ensure high quality public transport, they did also call for a business impact assessment to be undertaken.

Individual hotels had a number of concerns were raised relating to access to hotels for taxis, coaches and private cars, access to their car parks and access for deliveries. The proposed for removal of taxis from College Green changes raised objections with many hotels against the proposal and others calling for further details studies to be done.

There were also concerns about proposals on the Quays as well as in locations specific to individual hotels.

The Fitzwilliam hotel on Stephens Green raised issues with the proposal to pedestrianise Stephens Green North and requested that access to their hotel be maintained at all times.

3.4 Cycling

Submissions were received from Cycling groups /Campaigns and operators. One submission included a petition signed by almost 1,600 cyclists stating “We support a pedestrian and cycling space in Dublin City Centre as outlined in the Transport Study ” along with individual comments.

The Dublin Cycling campaign were very supportive of the study and its vision, they suggested that reducing the available car park spaces in the City centre would reduce traffic levels and that DCC should take a lead in this area. They suggested developing Park and ride sites and the implementation of a delivery management system. Other proposals were for Contra flow cycling on all one way streets, priority action to identify and remediate unsafe areas for cycling and the extension of the 30kph areas and also that the proposal for a cycling walking bridge over the Liffey at Winetavern Street should be advanced.

Other submissions included support for the study, commuter parking, cycle lanes and safety, concern was raised over access to College Green for moving and maintaining Coca-Cola Zero dublinbikes.

3.5 Taxis

1,658 submissions were received from Taxi Drivers and users these raised four main issues :-

1. Access to College Green should not be altered for Taxis.
2. Right Turn to Cathal Brugha Street Should be maintained.
3. Right Turn to Eden Quay from O'Connell Bridge should be retained
4. Issue of Rickshaws in the city centre.

There is opposition to the ban on taxis through College Green due to the diversions that taxis will have to take and the additional time and cost for customers. The proposals will particularly affect business customers, tourists and the elderly and mobility impaired users. They have queried why there would be restrictions for 24 hours and that allowing taxis through the areas once public transport reduces or ceases which would provide a certain amount of passive safety.

A number of submissions requested that the ban on taxis in College Green should not apply outside Public Transport operational hours.

Taxis operators also highlight that they should be considered part of the public transport system.

3.6 Other Stakeholders

Twenty-seven submissions were received from other interested Stakeholders. Many stated their support for some or all of the measures of the Study including the proposed interchange at Connolly Station.

Concerns raised included access for deliveries to premises around the College green area, access for private cars to car parks and to different areas of the city, and comments on Foster's Place, St Stephen's Green North and Suffolk Street. Most submissions had comments relating specifically to their organisation.

Trinity College in their submission welcomed the study, supported the College Green plaza provided access to the college could be maintained. They also welcomed the bus and rail proposals and proposed that the taxi rank in Fosters Place be removed.

UPS in their submission regarding deliveries in the city centre proposed having a mobile delivery point in the city centre from which UPS would deliver and collect packages on foot and by bicycle. This is currently operating in Hamburg and they would like to work with DCC on implementing it in Dublin.

AnTaisce made a submission broadly supporting the proposals in the study.

The Temple Bar Company in their submission requested access to the Fleet Street car park be maintained and that taxis be relocated from Fosters Place, as well as extension of the pedestrian areas of Temple Bar.

Bank of Ireland made a submission supported the development of pedestrian areas within the City Centre and wishes to work with Dublin City Council and other stakeholders to ensure the experience for those who live, work and visit the area is a positive one.

The Bank of Ireland's view is that College Green and Foster Place should be considered as a single entity and the current use of Fosters Place by Taxis should be changed and the area pedestrianised. They also believed the proposed Plaza area should be on the South side of College Green.

The bank drew attention to their for vehicular access to the bank premises both for their customers as well as for cash in transit deliveries. They emphasised their belief that a space in the City Centre devoid of safe and viable commercial activity cannot be the desired outcome.

Dublin Friends of the Earth also made a submission the main points of which are:-

- Welcome for the proposed measures to enhance public transport, make walking and cycling safer, restrict private car use and improve the public realm.
- Criticism of the extraordinary omission in the Transport Study of the climate change context for all transport planning and development.
- Concern at the aspirational nature of many proposals in the Study.
- Advocacy of additional and stronger proposals to promote public transport and to deter private car use; and comments on cycling and bus fleet issues.
- Need for public awareness campaign on how transport improvements can improve health and wellbeing in Dublin and help to reduce dangerous carbon emissions.

3.7 Members of the Public and resident associations.

Twenty-three written and email submissions were received from members of the public before the closing date, three after the closing date. Some of the submissions were in support on the Study although others raised concerns over access for mobility impaired users; access for private cars and the effect on business; parking; a need to widen pavements; improvements to cycle facilities and public transport.

3.8 Elected Representatives

Seven submissions were received from Elected Representatives (Councillors, TDs and Senators), some on behalf of political parties. There was support for some elements of the Plan, and some objections. The concerns that were raised include the restrictions on private cars on the Quays and College Green; access to the city centre and parking; inadequate public transport alternatives; need for improved cycle facilities and parking; access for residents; arrangements

for travelling to city centre schools and the economic impact of implementation of the plan and requests for further studies to be undertaken

3.9 Public Transport and Ferry Operators

Submissions were received from public transport operators and bodies. There was support for elements of the Plan with broad support for the objectives and principles. The proposed restrictions to College Green were supported as it should improve journey times and reliability for bus passengers.

Both private and public operators raised areas of concern regarding coach parking in the city centre; bus stop capacity and locations, impacts of cycling provision on public transport and the desire to ensure that there was a good public transport service which serves the city centre and delivers passengers to where they wish to go.

A number of Ferry operators made submissions regarding the potential impact which changes to the North and South Quays would have for their passengers and in particular that restrictions should only apply at the peak periods and not 24 hours.

4 Submissions

The report does not set out the details on all of the submissions received. It is intended to highlight some of the main issues. All the submissions are being examined in detail so that all the relevant issues can be extracted in order to better inform the next steps.

Dublin City Council and the National Transport Authority wishes to acknowledge the high level of interest shown in this study by so many people.