



The DRAFT **Dublin City Development Plan 2016-22** is out for public consultation right now, giving each and every one of you the chance to have an input into the future of your City. The closing date for submissions is **this coming Friday 11th December** – check out <http://dublincitydevelopmentplan.ie/> This plan will shape the future of our capital city for at least the next 7 years and Beyond!

The Plan has a total of 16 chapters ranging from the Core Strategy, through Housing, Climate Change, Movement & Transport, Green Infrastructure and others. If you care about the future of your City check it out and make your voice heard now!

Here below is a copy of the second submission made by Dublin Cycling Campaign on the Development Plan. We made an initial submission at the pre-consultation stage on behalf of cyclists in Dublin earlier this year. Feel free to copy and paste from our submission below if you agree with any particular issues..... and Good Luck with your own submission!

1 Dublin Cycling Campaign is happy to contribute once again to the process of finalising the Dublin City Development Plan 2016-22. We acknowledge the incredible detail and complexity contained in this Plan, and commend the work of Dublin City Council officials, and of the elected members of the Council in reaching this stage. We hereby make the submission below, but we would welcome the opportunity to receive feedback on our submission. All areas of suggested change are highlighted in **BOLD** lettering, with specific changes also underlined.

2 Chapter 1 – We welcome the statement in Section 1.2 that the Plan is ‘based on the principles of sustainability and resilience on the social, economic, and environmental fronts’. But, we urge the following wording changes below to Elements B and E of ‘essential elements of a sustainable city’, to include the critical essence of a ‘Living City’ and the ‘Health & Wellbeing of its citizens’, as follows: - see underlined elements for proposed changes

B. Social/Residential – Developing Dublin City as a compact ‘Living’ city with a network of sustainable neighbourhoods which have a range of facilities and a choice of tenure and house types, promoting health and well-being, social inclusion and integration of all ethnic communities.

E. Movement – Helping to build an integrated transport network and encouraging the provision of greater choice of public transport and the promotion of active travel

Ensuring that these outlined principles underpin the overall Plan should help to ensure a realistic and practical blueprint for Dublin City.

In Section 1.5 we assume that there is a mistake in the inclusion of the word **land** in the following statement, and propose the removal of the word **land**, as it compartmentalises and lessens the broader essence of the statement:

Dublin City Council will actively engage with the relevant agencies and undertake an active land management role to progress and secure the implementation of the Plan.

3 Chapter 2 – Vision and Core Strategy –

- Section 2.1 The Vision for Dublin. We note the absence of the original visionary statement from the 2011-17 Plan as follows: **The vision for cycling is to make Dublin a city where people of all ages and abilities have the confidence, incentive and facilities to cycle so that by 2017, 25-30% of all new commutes within the city will be by bike** We are aware that the ambitious target is unlikely to be reached, but we wish to see a re-statement of that vision of a City where Active Travel is possible for all ages!
- Section 2.1 The Vision for Dublin. Under the first paragraph under ‘Vision for the City’ – take out the final sentence altogether, or remove the words ‘invest in’. If the sentence is to remain we suggest the following alternative: **‘the vision is for a capital city where people will seek to live, work, and socialise as a matter of choice’**.
- Section 2.2 Core Strategy. We propose the addition of a **new Policy CS – To promote the Health & Wellbeing of all Dublin’s citizens, to ensure the success of all the proposed measures outlined in this Plan.**
- Section 2.2 Core Strategy. We propose the addition of a **new Policy CS To explore and access all potential funding sources for City Development**
- Section 2.2 Core Strategy. We propose the addition of a **new Objective, CSO ‘to explore the viability of locating an EU liaison officer in Brussels for the specific purpose of researching and accessing any available funding.**
As a European example the city of Eindhoven (Pop approx. 220,000) has 2 full time officers working in Brussels with a brief to access EU funds for the city. This has been very beneficial for the City.
- Section 2.2.6 Public Transport. The GDA Transport Strategy reference needs to be updated to latest 2016-2035 DRAFT strategy
- Section 2.2.8.2 Monitoring Indicators. We welcome the broad commitments made in this section and in Chapter 13 on reporting of progress on a biennial basis and providing an annual sustainability progress report. While we note and agree with the stated proposal in Chapter 13 to measure objectives using the SMART Approach (Specific, Measurable, Achievable, Relevant and Timebound), this is not borne out by the monitoring ‘details’ outlined in Appendix 20, which are skimpy, very general and limited in their scope and application. The monitoring measures need to be totally reappraised to ensure they are SMART and comprehensive.
- Section 2.2.8.3 Engagement with Stakeholders. Active Consultation and Engagement is a critical cornerstone of a true citizen-influenced development process, and needs to be central to the **Core Strategy**. We would like to see a clear stated commitment to **active engagement** with the public, through innovative methodologies and various media channels, and to monitoring the effectiveness of this engagement. This section, while recognising and agreeing with the ethos of the engagement principle, needs to clearly outline the regular engagement channels with the people of Dublin via area committees, SPCs, Sub-committees etc, and to commit to explore other potential innovative means.
- Section 2.3.6 Movement & Transport. We welcome the broad thrust and specific objectives of this sub section
- Section 2.3.8 Green Infrastructure. The 2nd paragraph of this section refers to ‘health-related benefits’ of green infrastructure, but, as we have stated above, health and wellbeing benefits arise from virtually all other areas within this plan and need to be recognised.

4 Chapter 3 – Climate Change

- Section 3.4 Strategic Approach. We welcome the commitment to update the ‘Climate Change Strategy for City’
- Section 3.5.4 Integrating Climate Change Policies into the Development Plan. We welcome the broad integration of climate change issues into all areas of the Plan

5 Chapter 4 – Shape & Structure of the City

- Section 4.5.7 Pedestrian Wayfinding System. This should be broadened to include a Cycling wayfinding system. It is critical for the future shape and use of city. We thus propose an update of **Policy SC22** as follows: **To consolidate and expand the Pedestrian Wayfinding System and develop a cycling wayfinding system in tandem, which will provide a basis for a more coherent system of signage for active travel.**

- Section 4.5.7 Pedestrian Wayfinding System. And we also propose an update of **ObjectiveSCO10** as follows: **To review the Pedestrian and Cycling Wayfinding System in consultation with the Department of Transport, Tourism & Sport, Dublin Tourism, national cultural institutions and other civic interests in order to ensure the provision of appropriate signage for the principal places of interest in the city**
- Section 4.5.9 Urban Form & Architecture. We note the inclusion here of a specific objective **SCO11** to access EU Funds. We propose that this specific objective be deleted, and replaced by the core Policy and Objective on funding proposed above in Section 3 (Chapter 2)

6 Chapter 6 – City Economy & Enterprise

- Section 6.4 Strategic Approach. We propose the addition of an extra critical bullet point as follows: **Reducing congestion in the City and enhancing mobility options for all**

7 Chapter 8 – Movement & Transport

- Section 8.3 Challenges. We agree with the challenges listed, but in particular we emphasise that the issue of **‘proactive engagement....with communities’** is a critical element among the challenges listed.
- Section 8.5.1 Integrated Land-use and Transportation. **The National Cycling Policy Framework (NCPF) and the National Cycle Manual** should be added to **MT1** for completeness
- Section 8.5.2 Promoting Modal Change. We agree with **MT2** but **NRA/RPA needs to be updated to TII** + we propose that a **new Objective MTO** be added as follows: **To actively promote cycling and walking in order to encourage mode change from private transport to active travel and public transport.**
This is a critical statement in the context of the broad policy and objectives of the Plan which has not been included elsewhere.
- Section 8.5.3 Public Transport. We agree with stated policy and objectives, but **do not support the present concept of the airport metro as shown on the map (Fig 9)**
- Section 8.5.4 Promoting Active Travel; Cycling & Walking. We propose additional wording in this short sub section to recognise the widespread benefits of lower speed limits in encouraging active travel, as follows: **The benefits of lower (30kph) speed limit zones in relation to active travel have been thoroughly documented and recognised, including:**
 - **encouraging active travel,**
 - **providing safer and easier mobility for all ages,**
 - **improving health including mental health,**
 - **accident reduction,**
 - **better air quality,**
 - **noise reduction,**
 - **economic advantages**
 - **more ‘liveable’ cities with greater social interaction**
- Section 8.5.4 Promoting Active Travel; Cycling & Walking. We propose slight wording change in Policy **MT8** to include Cycling Ireland as they are commissioned to produce the national cycle training standard. We propose change of wording as follows: **MT8: To work with initiatives by relevant agencies and stakeholders such as An Taisce’s ‘Green Schools’ initiative, Cycling Ireland, and the NTA’s ‘Smarter Travel’ unit, to promote active travel in schools and communities, recognising the health and social benefits of walking and cycling as well as the environmental benefits.**
- Section 8.5.4 Promoting Active Travel; Cycling & Walking. In line with above **Policy MT8** we propose the addition of a **new Objective MTO** as follows: **To actively promote the adoption of Green Schools travel flags by all schools in Dublin City.**
- Section 8.5.4 Promoting Active Travel; Cycling & Walking. We propose the editing of Policy **MT10** as follows: **To provide 30kph speed limits and traffic calmed areas throughout the city and in each of the neighbourhoods shown in map “A City Neighbourhoods” in chapter 12.**
- Section 8.5.4.1 Cycling. We note the discrepancy between the stated aim in this Section ‘to increase mode share associated with cycling to reach a minimum target of 25%’ with the stated challenge in the final bullet point of Section 8.3, ‘to raise cycling from 5% to 12%’. We propose that this stated aim be added as a **new Objective MTO** as follows: **To achieve a cycling mode share of 25% within the period of this Plan**

- Section 8.5.4.1 Cycling. The **DRAFT City Centre Cycle Parking Strategy** should be specifically referenced in **MTO7 & MTO13**.
- Section 8.5.4.1 Cycling. Under Objective **MTO8** we propose that the **priority cycling projects** that will hopefully come on line over the coming years are **listed**, as has been done in Section 8.5.7 MTO26 for Roads and Bridges
- Section 8.5.4.1 Cycling. In line with stated Policy MT7 on 'implementation of improvements to thoroughfares and junctions' that Objective **MTO9** be reworded as follows: **To improve existing cycleways and bicycle priority measures throughout the city in the short term, by implementing immediate improvements to thoroughfares and junctions, and to create guarded cycle lanes, where appropriate and feasible.**
- Section 8.5.4.1 Cycling. We propose that Objective **MTO10** be changed to the following: **To actively pursue the target of 30kph as the default urban speed limit for Dublin City, and that any higher speed limits, such as 50kph or greater, only be introduced after a full environmental and risk assessment.**
- Section 8.5.4.1 Cycling. We propose a new Objective MTO as follows: **To retrospectively remove inspection manhole covers from cycle lanes/tracks due to skid potential, and to ensure no new manholes are placed in cycle lanes/tracks.**
- Section 8.5.4.1 Cycling. We propose a new Objective MTO as follows: **To ensure quicker response and more enduring repairs to road openings so that surfaces remain safe for cycling.**
- Section 8.5.4.1 Cycling. We propose a new Objective MTO as follows: **To collate all data on cycling numbers available through numerous monitoring points in the City, and arrange to review and analyse annually, with a view to pinpointing trends throughout the City, and to feed into ongoing policies.**
- Section 8.5.4.2 Walking. We broadly agree with the Policies and Objectives set out here but propose a new Objective MTO be inserted as follows: **To improve existing junctions and pedestrian priority measures throughout the city in the short term, by implementing immediate improvements to thoroughfares and junctions, in particular by reducing pedestrian wait times at crossings, and narrowing crossings to make them safer and more pedestrian friendly.**
- Section 8.5.5 Mobility Management & Travel Planning. The Drimnagh Mobility project is rightly lauded in the text, but there is no Objective in there to develop further Area Mobility Plans, despite the success of this initiative. We propose 2 additional Objectives MTOs as follows: **To carry out further area mobility motivation and planning projects where feasible** and MTO - **To actively encourage a modal shift to cycling and walking, with a particular emphasis on schools.**
- Section 8.5.5 Mobility Management & Travel Planning. We propose a slight editing of MTO21 as follows: **To support the growth of Electric Vehicles and EBikes, with support facilities as an alternative to the use of fossil fuel-burning vehicles, through a roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations, and retrofitting of existing charging points to facilitate E-bikes.**
- Section 8.5.5 Mobility Management & Travel Planning. The map on page 64 Fig.11 'Strategic Pedestrian Routes & Related Connections' should coincide with map on page 26 Fig.3 'Making a Legible City - Key Spaces and Connections', showing key pedestrian routes, but does not. This should be rectified.
- Section 8.5.6 Car Parking. **REMOVE** Policy MT13 **minimise loss of on-street car parking**. This Policy should be removed as it runs contrary to the broad emphasis of the Plan to improve pedestrian and cycling mode share, as enunciated throughout the document.
- Section 8.5.6 Car Parking. We propose additional Objective MTO as follows: **Consider the feasibility of the introduction of a levy on private car parking spaces**
- Section 8.5.6 Car Parking. We propose additional Objective MTO as follows: **Review level of available private off street car parking in city centre, between canals, and consider the introduction of a private parking levy**
- Section 8.5.7 Road & Bridge Improvements. We note and welcome the prioritisation of cycling, pedestrians and Public Transport under Policy MT19, and in line with this Policy we propose a new Objective MTO as follows: **All projects initiated shall undergo a comprehensive safety audit, which shall be made publicly available**

- Section 8.5.9 Environmental and Road Safety Impacts of Traffic. We suggest minor edit of **MTO 37** as follows: Replace ‘**appropriate**’ with ‘**inappropriate**’ in 1st bullet, and add ‘**including electric bikes**’ at end of final bullet.
- Section 8.5.11 Accessibility for All. We propose an **additional MTO** as follows: **To review cycle times and pedestrian crossing times at all signal controlled crossings to take account of children, people with disabilities, and older people**
- **MISSING SUB-SECTION!?** We note what we consider a critical omission in this chapter on Movement & Transport, with reference to retail and business deliveries and parking. Recently Dublin Cycling Campaign has highlighted the widespread practice of parking in cycle lanes and bus lanes during active periods (Twitter Campaign #freethecyclelanes). But, retail and business deliveries are critical for the success of the local economy! In light of the above we propose the introduction of a new subsection **8.5.6.1 Business Parking and Deliveries** with the following Policy and Objectives:
 - New Section 8.5.6.1 Business Parking and Deliveries. **New Policy MT – To ensure as far as possible that business parking and deliveries are carried out at low traffic periods and at times of non-active bus and cycle lanes.**
 - New Section 8.5.6.1 Business Parking and Deliveries. **New Policy MT – To develop alternative sustainable methods of retail and business deliveries, such as are recommended in the European Cycle Logistics website <http://www.ecf.com/projects/cyclelogistics-2/>**
 - New Section 8.5.6.1 Business Parking and Deliveries. **New Policy MT – To explore the development of a city centre ‘delivery hub’, possibly as part of the ‘City Markets Project’.**
 - New Section 8.5.6.1 Business Parking and Deliveries. **New Objective MTO – To initiate a discussion process with city businesses in order to improve delivery processes and time periods.**
 - New Section 8.5.6.1 Business Parking and Deliveries. **New Objective MTO – To actively implement parking laws with a view to discouraging illegal parking in cycle and bus lanes during operational periods.**
 - New Section 8.5.6.1 Business Parking and Deliveries. **New Objective MTO – To develop new lay-bys and delivery areas where possible.**

8 Chapter 9 Sustainable Environmental Infrastructure

- Section 9.5.6 Air Quality. We propose an **additional Objective SIO** as follows: **To promote the greater use of low carbon fuels, particularly in Public Transport, but also in delivery vehicles and private cars.**
- Section 9.5.6 Air Quality. We propose an **additional Objective SIO** as follows: **To install air quality monitoring stations at further city locations, and to publish the recorded data.**

9 Chapter 10 Green Infrastructure

- We welcome the commitments to enhancing Dublin’s green infrastructure, as this is a critical element in building a truly ‘Living City’. We do however note that **Fig.13 ‘Strategic Green Network’** omits the strategic partly built **S2S coastal path/green corridor!?**
- Section 10.5.1 Green Infrastructure. We note Policy GI5 ‘*To promote permeability through our green infrastructure for pedestrians and cyclists*’, and concomitant Objective GIO5, but we propose an **additional specific GIO** as follows: **Review cycle access to all existing parks with a view to improving access gates and removal of rogue ‘No Cycling’ signs.**

10 Chapter 12 Sustainable Communities And Neighbourhoods

- Section 12.5.3 Neighbourhoods and Supporting Infrastructure. We propose additional **new Policy SN** as follows: **The design of roadways in all new residential developments must be in line with DMURS and facilitate self-enforcing lower traffic speeds, below 30 kph without the need to resort to the use of remedial measures such as speed ramps**

11 Chapter 13 Monitoring, Implementation and Development Management

- Section 13.2.4 City Performance Indicators. It is suggested that progress on Objectives will be measured using the SMART Approach (Specific, Measurable, Achievable, Relevant and Timebound). This is not borne out by the **monitoring ‘details’ outlined in Appendix 20, which are skimpy, very general and limited in their scope and application.** The monitoring measures

need to be totally reappraised to ensure they are SMART and comprehensive. See separate proposals re **Appendix 20** below

12 Chapter 14 Land Use Zoning

- Section 14.8.4 District Centres – Zone Z4. **Amend bullet 3** under ‘general development principles’ to add ‘cyclist’ as follows: ***Transport: Ensure provision is made for quality public transport systems. Provide improved access to these systems and incorporate travel plans, which prioritise the primacy of pedestrian and cyclist movement and address the issue of parking facilities and parking overflow.***

13 Chapter 15 Strategic Development and Regeneration Areas.

- **We note the omission of strategic permeability/walkability/cycleability from many of the SDRAs plans** outlined in this Chapter, and urge a revision of those LAPs within these SDRAs to ensure that these items are specifically addressed

14 Chapter 16 Development Standards

- Section 16.9 Roads & Services. In 1st paragraph add **cycle paths and lanes**. They appear to have been inadvertently omitted. Specific reference should also be made to the **National Cycle Manual** as a design document.
- Section 16.10.1 Residential Standards – Apartments. We particularly welcome the inclusion of specific cycle parking guidelines, but a **similar guideline** should also be included in **16.10.2 Residential Quality Standards – Houses** and **16.10.7 Guidelines for Student Accommodation**

15 APPENDIX 4 Transport Assessments, Mobility Management and Travel Plans

- Section 4.2.2 What type and scale of development will require submission of a Travel Plan? We propose a slight edit of the wording in this section to ensure ALL large developments, such as schools, colleges etc, are considered, as well as commercial developments. We propose the following wording: **As a general guideline, Dublin City Council may request a Travel Plan if an existing or proposed commercial development has the potential to employ over 100 workers generate over 100 user trips.**

APPENDIX 20 City Performance Indicators

Overall this Section is very weak, and we seek a thorough review of monitoring methods and standards. However we specifically propose the following additions under Section 20.4 Movement & Transport:

D. Collect and publish annually the incidence (geo-located on GIS mapping) of serious injuries (admission to hospital bed) and fatalities on the City’s road from HSE data set. Associate the accidents/incidents with vehicles, Dublin Bikes or private bikes, to establish trends in public bike safety, and potential danger spots.

E. Detect, and publish annually, data for the numbers of bicycles moving around the City’s roads over and above the annual single day canal-cordon counts, through analysis of permanent monitoring station data.

F. Publish annual data on number of HGV permits issued and the number of HGVs detected that did not have a valid permit;

G. Set up a monitoring programme for assessment of the effectiveness of Mobility/Travel Management Plans and publish the findings;

H. Monitor the provision of safe/secure bike-parking facilities across the City in line with the Draft City Centre Bike Parking Strategy

H. Publish data on incidence of bike-theft as it becomes available.

J. Publish annual progress reports on project progress and budget spending against budget allocations

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