Dublin City Development Plan – Strategic Issues Paper

22nd February 2021

Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. We have over 800 paying members and are a member of the Dublin City Council Traffic and Transport Strategic Policy Committee. We have a vision for Dublin that is a vibrant liveable city where people of all ages and abilities choose to cycle as part of their everyday life.

Our submission is mainly focused on the sustainable transport theme, however, we have a number of comments on other themes in this strategic issues paper.

Theme 1: Shaping the City

We welcome the drive towards a more compact 15-minute city model. Mixed-use development with nearby local services is one of the best ways to encourage people to choose active modes, like walking and cycling, for their journeys.

Providing higher-density developments with housing, workplaces, schools, local healthcare facilities, parks, community centres and retail within 15 minutes walk or cycle from every house within the Dublin City administrative area must be the goal of how the city is shaped into the future.

Theme 2: Climate Action

Dublin City Council's (DCC) corporate emissions only account for 5% of the emissions for the DCC area[1]. The greatest impact DCC can have is not just in reducing its own emissions but by helping the citizens of Dublin to reduce their emissions too.

Transport emissions within DCC's area accounts for 24.8% of total emissions within the DCC area[2]. The other two major contributors were residential emissions (34.7%) and the commercial sector emissions (32.3%).

While DCC policy can have some impact on reducing residential emissions, in particular for new or renovated housing stock, the majority of retrofitting or upgrading of residential energy usage will be by other government agencies. The same will be true for commercial emissions.

Dublin City Council is the government agency with the greatest potential for reducing emissions from transport in the DCC area. Reducing emissions from transport in Dublin will be through three main approaches:

1. Reducing the need for travel (remote working, 15-minute city, affordable housing within the city limits to reduce unsustainable long-distance commuting)
2. Modal shift towards walking, cycling and public transport
3. Electrification of the remaining, and smaller, motor traffic fleet

Reducing the need for travel

Dublin City Council objectives and policy in the development plan needs to focus on reducing the need for travel, in particular unsustainable long-distance travel (>10km) that is difficult to provide via public transport or active travel.

Providing affordable housing within the city limits will be key for reducing the need for many people, in particular young families, to migrate to the sprawling edges of the city far outside the DCC area.

Modal shift to sustainable transport modes

All of the research is clear. People will choose sustainable transport modes if they provide comparative advantages above other modes. While the major public transport

[1] Dublin City Council Climate Action Plan 2019 - page 5
[2] Dublin City Council Climate Action Plan 2019 - page 52

projects will be delivered by the National Transport Authority there is still lots of scope for Dublin City Council to act.

There are a huge number of areas within DCC's remit that will enable people to choose sustainable modes of transport or make the swap. This will enable the citizens of Dublin to reduce their transport emissions. These actions include: reallocating road space to walking, cycling and public transport, protecting cycle lanes, extending bus lanes and their hours, providing more cycle parking, providing more pedestrian crossings, reducing or eliminating unsuitable through traffic in residential areas or urban centres.

Theme 6: Sustainable Movement and Transport

There are a number of key questions raised in the strategic issues paper. We will address all of those in the following areas below.

6.1 Enabling, Encouraging and Promoting Modal Shift

As we mention under Theme 2, the research is clear. People swap to alternative transport modes – including walking, cycling and public transport – when they perceive those modes of transport to have a comparative advantage above other modes.

In Dublin Cycling Campaign's 2020 members survey, 62.1% of our members said they chose to cycle because it was the most convenient mode of transport. They found cycling quicker, with more reliable journey times and easy to find parking as the key reasons for why they chose to cycle for transport. 18.1% chose cycling for personal health benefits and 10.3% for environmental reasons.

The number one reason our members quit cycling in Dublin is that they feel unsafe, mostly because of road traffic danger from other road vehicles. The second biggest reason is that their cycle was stolen. One third of people in Dublin who have their cycle stolen do not replace it and quit cycling.

The NTA's Bike Life Report 2019 provides fantastic insight for why people say they don't cycle. Including concerned about safety (33%), poor weather (24%), not confident cycle (18%), not for people like me (15%), living too far away from destination (13%), children / passengers or too much to carry (9%), lack of storage for cycle (8%), cost of suitable cycle (5%) and too hilly here (4%).

All of the data above is why Dublin Cycling Campaign's philosophy for getting more people cycling is that first we need to enable people to cycle, then we need to encourage people to cycle and then we promote cycling.

Dublin City Council can play a huge role in enabling people of all ages and all abilities to cycle in Dublin. Dublin City Council can help reframe cycling away from the stereotype as a niche transport mode for the young and fit towards one suitable for everyone.

This will require cycle routes built to a standard that all users will want to use them including children, older people or those on non-standard cycles, like tricycles and cargo bikes.

DCC can remove restrictive barriers, like kissing gates that block many types of users, particularly those on non-standard cycles or those who are not able to lift their cycle past these barriers.

DCC has a large role to play in providing a diverse range of cycle parking for all types of users, which we discuss more below.

6.2 Building cycle network for all

Cycling can be an option for almost everyone if we design within everyone in mind. The biggest barrier to more people choosing to cycle is that they think cycling isn't a safe enough option for them. We need a network of connected cycle routes that are safe for people of all ages and abilities to cycle.

Lines of paint on the road isn't good enough for the vast majority of potential users. We need segregated cycle lanes, or low-volume and low-traffic roads. We need

junctions that are easy and safe for everyone to navigate and not just the most confident road users.

Cycle lanes need to be wide enough to cater for the volumes and variety of users. Many cycle lanes in Dublin are too narrow to accommodate a person with balance issues that uses a tricycle, or a parent cycling with their two kids in their cargo bike, or a parent guiding a novice child on their own bike.

Building a high-quality cycle network is not just about providing a safe space for people to cycle. It is about showing that the city is serious about cycling. It will enable a more diverse range of people to cycle. One of the biggest reasons why people start cycling is that they see people like them cycling.

6.3 Public cycle parking

Providing high-quality, secure and convenient public cycle parking is key to enabling and encouraging more people to cycle. There are a number of reasons for this:

1. Adequate cycle parking is needed so that cycling remains a convenient mode of transport in comparison to other modes
2. Secure cycle parking is necessary to enable people to choose to cycle and to reduce cycle theft. One third of people who have their cycle stolen quit cycling afterwards
3. Cycling parking, particularly when well used, is a great advertisement for cycling. It shows people who don't cycle that there are lots of people that cycle, which will help them think of it as an option too

6.3.1 On-Street Cycle Parking

We're delighted to see the continued roll-out of on-street cycle parking across the city. It's great to see a growing diversity of cycle parking including the cargo bike cycle parking locations. This is key for making cycling a convenient mode of transport.

6.3.2 Off-Street Cycle Parking

The Drury Street cycle parking is a major asset to the city. More facilities similar to this are needed across the city. This is particularly true for e-bike users. E-bikes are expensive and are a frequent target for theft. The added security of off-site cycle parking facilities, like Drury Street, are really important for e-bike users who are nervous about parking their expensive e-bikes at on-street cycle parking locations.

Outside of the city centre, where there is available space in multi-storey car parks to convert, there is also a need for local indoor off-street public cycle parking. The Dutch have examples of neighbourhood cycle parking facilities. Frequently it is just vacant shop units that are temporarily converted into indoor cycle parking with a small fee to cover the costs. These kinds of facilities would work well in Dublin's urban villages.

Public cycle parking in a vacant shop unit in Utrecht, Netherlands

6.4 Private cycle parking standards

The provision of cycle parking within major developments has definitely changed in the DCC area over the life of the current development plan. With the adoption of the Apartment Guidelines in 2018 we've seen the volume of cycle parking in private residential developments increase significantly. However, the quality has been lacking in many applications.

There are many aspects of the quality of cycle parking that isn't well provided for current planning applications. These include:

- Easy access to covered cycle parking. Frequently new developments require people to dismount, navigate multiple doorways with their bike, or cycle parking is hidden at the back of basement car parks
- Only one type of cycle parking is provided

There is a need for development standards in the next Dublin City Development plan to provide better guidance and requirements on new developments to provide high-quality and not just high-quantity cycle parking.

Example of a double-stacked bicycle parking rack

6.4.1 Exclusively double-stacked cycle parking

One of the major issues from our perspective is that many developments are proposing only one type of cycling parking: double-stacked cycle parking racks. These cycle parking racks are great at providing high-volume cycle parking in smaller spaces, which has advantages to developers. However, these double-stacked racks do not accommodate anything that isn't a standard bicycle. They do not accommodate cargo bikes, or tricycles, or even a standard bicycle with a child's seat attached to the back. Unless the cycle parking stand is gas-assisted it can also be extremely difficult for people to operate the upper tier of bike racks.

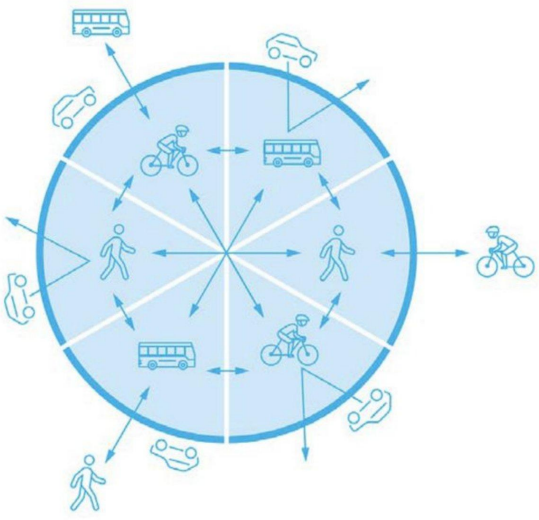
Without providing a diverse range of cycling parking options, we cannot make cycling a realistic option to diverse groups of people with diverse needs. Here are a number of example developments in the DCC where the vast majority of the proposed cycle parking was double-stacked racks suitable only for standard bicycles:

- Mixed-use development in Dolphins Barn, DCC ref: 3618/15, granted, 12 cycle parking spaces, 100% in double-stacked racks
- Offices at Shaw Street, DCC ref: 2062/21, granted, 200 cycle parking spaces, 100% double-stacked
- Re-development of TUD Kevin Street, DCC ref: 2682/20, granted, 1,302 cycle parking spaces (1,250 at basement level), 100% in of basement spots in double-stacked racks
- Connolly Quarter SHD, ABP-305676-19, granted by ABP – quashed by High Court, 766 cycle parking spaces, 100% in double-stacked racks
- Castleforbes Street SHD, ABP-308827-20, pending decision, 1010 in double-stacked tracks and 30 cargo bike cycle. Only 2% are non-standard cycle parking. This doesn't leave much room for parents with child seats on bicycles etc.
- KPMG building redevelopment Stephen's Green, DCC ref: 2062/21, pending decision, 600 cycle parking spots, 100% double-stacked

Good example of a development that provide a mix of cycle parking is:

- 105 apartments Station Road Raheny SHD, ABP-308552-20, pending decision, a mix of double-stacked racks and standard Sheffield stands. 65% in double-stacked racks. This development could be improved by adding specific cargo cycle parking spots.

6.5 Traffic circulation plan for core city centre and urban centres



There are inappropriate levels of through-motor-traffic in the core city centre. Our definition of core city centre is the area roughly between Winetavern Street to Westland Row, and Cuffe Street to Parnell Street.

This through-traffic is hungry for space in the locations where space is at a premium. Through-traffic on a street means people cycling

need dedicated cycle lanes and that public transport needs dedicated bus lanes in order to work effectively. All of this adds more pressure on the limited space available in the city centre.

Dublin needs a traffic circulation plan that will remove through-traffic from the core city centre, while still allowing local access. This will free up significant amounts of space for wider footpaths, cycle lanes and faster public transport. Groningen in the Netherlands, and Ghent in Belgium, have seen significant success in implementing traffic circulation plans that limit through-traffic in the core city centre. Private traffic can enter the core city centre for access but the vehicles must leave in roughly the same direction that they entered.

6.6 Low traffic neighbourhoods

Low traffic neighbourhoods (LTN) have been taking off in the UK in the past few years. They are residential areas where through-traffic is prevented using modal filters or traffic cameras.

Essentially LTNs, are filtering permeability like Grangegorman, Walsh Road or Pigeon House Road, but done on an area wide basis. The area wide basis is key because it means closing off one rat-run does not cause a new rat-run to be created.

LTNs in London have been designed to reduce noise and air pollution, and road danger in residential streets. Research from Dr. Rachael Aldred, shows that LTN do lead to modal shift towards walking and cycling. Low traffic neighbourhoods have been key to some outer London areas seeing modal shift.

Dublin has had significant success reducing private motor traffic within the canal cordon. However, in the inner and outer suburbs the private car is still the dominant mode of transport. LTNs offer one potential approach to enabling modal shift in these areas.

6.7 Walking and cycling zones

The strategic issues paper raises the question:

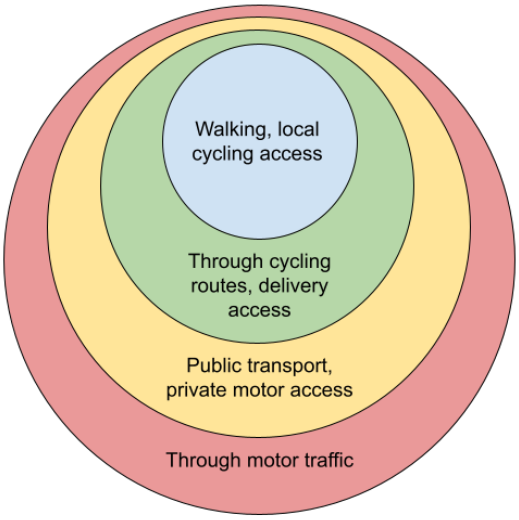
> *Should cycling be permitted through pedestrianised zones or areas where most people are on foot? If so, what measures could be put in place to make this happen for example use of signage, introducing of speed limits?*

There isn't a one size fits all answer to this question and the context depends dramatically. In principle, people walking and people cycling can mix comfortably under the right circumstances. It depends on the volume of people walking or cycling, the space available and the speed at which people are cycling.

For example, Grafton Street is full of people walking. It wouldn't be possible to accommodate people cycling. However, South King Street is wider, has lower numbers of people walking and potentially has space to allow for people cycling.

If we are to talk about car-free zones like the proposed College Green plaza where a dedicated two-way cycle track is proposed then the context is significantly different.

The context of a street can change over time as more people use a street walking or cycling or the types of users change. Wagenstraat, in the Hague, is a shared walking and cycling shopping street. It has also become a main cycle route to one of the main train stations. There are growing conflicts between through-cyclists rushing to the station to catch a train and people accessing the street for shopping. It is important to consider how this street fits into the wider transport network and who are the types of users who will use it.



Dublin Cycling Campaign finds it useful to think about the level of access that should be provided to an area using the diagram on the left.

The network for walking should be tight. The block sizes should be small. The cycling network should be less fine grained than the walking network but more fine-grained than the public transport network.

A useful example is the Grafton Street area. There is the core pedestrianised zone, without cycling. Around that core should be streets accessible to local access cycling. For example, York Street, South William Street and Suffolk Street. The public transport network is outside of that running on Dawson Street, Cuffee Street and George's Street. The through motor traffic network is outside of that again, relying mostly on Patrick Street, and Merrion Square and not cutting through the inner zones.

6.8 Shared mobility

Shared mobility should be encouraged and promoted by Dublin City Council. It has a significant role to play in the future of transport in Dublin. From our perspective shared cycling schemes can play a number of roles:

- Provide access to cycles for those who can't afford or store one
- Provide last-mile cycles for people interconnecting with public transport
- Provide an easy and low commitment way for new people to try cycling
- Reduce the need for storage space of private cycles, particularly in the core city centre

6.9 Electric vehicle charging points

The issues paper asked "Should electric vehicle charging points be provided on public streets and in areas where residential permits and pay and display schemes are in operation?"

The answer is yes. Electrifying the fleet is a key part of reducing transport emissions and transport pollution in Dublin. However, these chargers should not be installed in a

way that narrows footpaths, or blocks any potential parking protected cycle route. We are a fan of the electric charging point model used on the FitzWilliam Cycle Route project

Theme 7: Green Infrastructure, Open Space, Recreation and Natural Heritage

In general less space needs to be allocated to transport in Dublin. Movement and storage of vehicles is only one use for the public space between buildings. We're not just talking about reducing space allocated for private cars, but all modes of transport including cycling and public transport.

More public space needs to be allocated to public seating, street trees, greenery, and children's play areas in our city. This will make Dublin a more liveable city. More public seating is needed so that people can socialise or rest. More trees are needed to provide shade, slow rain water run off, and clean our air.

The space between buildings is limited and we can't allocate all of it to transport. Reducing through-traffic is key to providing high-quality cycling and public transport routes without the need to allocate space for dedicated cycle or bus lanes. The traffic circulation plans, mentioned above in section 6.5, are key to achieving this.

These kinds of area based transport strategies can free up much needed public space for public realm and placemaking, which will make Dublin a more liveable city.

Theme 10: Sustainable Environmental Infrastructure and Flood Risk

Future flood protection schemes should look at protecting cycle routes as critical transport infrastructure. For example, early designs of the coastal flood protection at Clontarf had the cycle route in an area unprotected from coastal flooding. In order to make cycling a realistic option for people it must be an option year-round. The majority of cycle routes need to be protected from flooding, unless there is a clear alternative cycle route.

Recommended Policies and Objectives

We recommend a number of policies and objectives be included in the draft development plan.

Policies:

- All new cycle routes should be built to be suitable for people of all ages and all abilities

Objectives:

- To remove all barriers, including kissing gates, that make greenways, laneways or parks inaccessible to people on non-standard cycles, wheelchairs or buggies
- To adopt a traffic circulation plan to reduce inappropriate through-traffic in the core city centre
- To adopt 30km/h speed limits on all local streets in Dublin
- To eliminate inappropriate through-traffic from residential neighbourhoods and streets
- To reduce the amount of public space allocated to movement and the storage of all types of vehicles in order to provide more space for public seating, trees, greenery and children's play space

Development standards:

- Larger-scale private cycle parking should cater for a wide range of different cycles including: bicycles, tricycles, cargo bikes and recumbent cycles
- Indoor cycle parking should be fast and convenient to access. It should avoid the need for people to dismount or negotiate multiple doors to access the cycle parking

Kevin Baker
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