#

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

Date: 7th January 2022

### Summary

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

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

## General points:

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

## Trinity’s Feedback on the Strategy

### Chapter 8: Planning for Sustainable Transport

* **8.1 Introduction:** The consequences of our overly car-dependent city-region include: air pollution *and associated ill-health*poor and *dangerous* walking and cycling environments. All of the consequences listed act as disincentives to active travel and public transport use, and exacerbate car dependence - a statement to this effect would be welcome.
* **8.2 Emerging concepts in transport:** Trinity welcomes the NTA focus on 15 minute cities and 10 minute neighbourhoods.
* **8.3 Sustainable Delivery of Housing:** Trinity thanks the NTA for their focus on transport planning with housing, and supports the NTA’s prioritisation of walking, cycling and public transport. This is of particular importance to Trinity students who need affordable housing, in liveable areas. We would welcome the allocation of space to walking, cycling and public transport over cars in particular where students live. Cycling infrastructure should be protected from traffic.

**Measure Plan1** “SDZ Planning Schemes, Local Area Plans and large planning applications should be accompanied by appropriate Transport Plans or Transport Assessments setting out how the plan or development minimises the need to travel and how public transport, walking and cycling together can cater for the majority of travel demand.”

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

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

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

* **8.4 Consolidation of Development:** Trinity welcomes the NTA’s position on out of town retail development. Trinity has 1% car use. For many students and staff, cars are not an affordable or accessible means of transport. Climate change is of huge concern to Trinity students and staff. We thank the NTA for taking leadership on this issue.
* **8.5 Transit Oriented Development:** The Biodiversity and Climate Crisis is also of major concern to Trinity students and staff. Trinity asks that wherever possible, transport infrastructure supports biodiversity.
* **8.6 and 8.7:** Trinity welcomes the NTA’s focus on mixed use development and filtered permeability
* **8.9 Urban design and placemaking:** The inclusion of placemaking is welcome. Trinity would particularly like to see a focus on placemaking on College Green and on [our priority routes](https://www.tcd.ie/healthytrinity/travel/KeyRoutes.php) from Trinity Hall to College Green, on Pearse Street, on Nassau Street and from College Green to St. James’s Hospital. Other routes of importance to Trinity include the College Green to Santry and College Green to Iveagh Grounds. Trinity notes that the NTA has highlighted the importance of biodiversity. Trinity would like to see as much greening of the GDA as possible to respond to the biodiversity crisis. Plans to reduce car speeds to facilitate placemaking is fine but removing private cars from people centred places would be ideal.
* Dublin has no major public plaza in comparison to other capitals in the EU. We have remarkably little public green space as one approaches An Lár. With Trinity trying to restore biodiversity on its College Green campus, the NTA could compliment these efforts by supporting a public plaza on College Green. College Green has to be as green as possible and not a traffic sewer, even for buses/coaches.
* **8.11 The Road User Hierarchy:** Trinity is delighted to see the NTA’s continued support of the road user hierarchy. Trinity particularly welcomes the statement: “A high priority must also be given to cyclists, because trips by this mode have a great potential to replace trips by private car, most specifically for short to medium distance trips, but increasingly for longer trips as e-bikes extend the range of this mode.” Thank you. Trinity is concerned however that the following Action Measure dilutes this: **MEASURE PLAN16 – The Road User Hierarchy** The NTA, in the decision-making process around the design, planning and funding of transport schemes in the
GDA, *will be guided* by the priority afforded to each mode in the Road User Hierarchy as set out in the Transport Strategy. Trinity feels “will be guided” is not strong enough. Guidance can be easily ignored.

## Background

**About Trinity:** Trinity is the largest trip attractor in Dublin City Centre. The majority of our 16,000 students and 4,000 staff, study or work on our College Green Campus. Whilst the central work of the university is education and research, Trinity also has 661 on campus student beds on College Green/Pearse Street, approximately 1 million visitors per year to the Book of Kells exhibition and multiple cafes and gift shops open to the public. Our conference, private dining and banqueting services are busy year-round and from mid-May to mid-August we operate as the largest accommodation provider in Dublin with over 1,500 beds a night across our College Green and Trinity Hall campuses[[1]](#footnote-2).

**Trinity’s partnership with the NTA:** Trinity has partnered with the National Transport Authority as a Smarter Travel Campus since 2011. Through that partnership, data capture with the National Transport Authority has identified Trinity as a global leader in sustainable transport use with only 1% of our students and staff commuting by private car[[2]](#footnote-3). Trinity has participated in the National Transport Authority’s annual walking and cycling challenges with participation of greater than 100 people every year. In 2019, Trinity participated in the National Transport Authority’s Smarter Travel awards with one group of our students and one of our lecturers winning an award. Partnering with the National Transport Authority on the Smarter Travel Campus initiative has been a very positive and enjoyable experience and we look forward to continuing to do so.

**How Trinity is supporting #LiveableDublin:** In 2019, Trinity, PPI Ignite (a research project in Trinity) and BYCS Amsterdam (a Dutch not for profit organisation that promotes cycling) worked with the support of Dublin City Council to facilitate a city-wide debate on how Dublin can become more liveable. During the LiveableDublin events, participants defined and explored the question, “How can we speed up change in Dublin to make it more liveable?”[[3]](#footnote-4). Trinity made a submission to Dublin City Council on travel during COVID-19 restrictions calling for wider footpaths and safer cycling[[4]](#footnote-5). We were ranked as the top ‘Green’ University in 2020[[5]](#footnote-6). Trinity believes this work demonstrates that we are committed to working for and with the city to make Dublin more sustainable and liveable. During COP26, Trinity signed this letter urging governments to boost cycling levels. <https://cop26cycling.com/>

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

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

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

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

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

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

### Contact Details

For questions/comments on this submission please contact:

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1. <https://www.tcd.ie/corporate-services/assets/pdf/annual-report-2018-2019.pdf> [↑](#footnote-ref-2)
2. <https://www.tcd.ie/healthytrinity/travel/Stats.php> [↑](#footnote-ref-3)
3. <https://www.tcd.ie/healthytrinity/liveabledublin/> [↑](#footnote-ref-4)
4. <https://www.tcd.ie/healthytrinity/assets/documents/Covid-19/TCD%20DCC%20Covid%2019%20Submission%20Final.pdf> [↑](#footnote-ref-5)
5. <https://www.tcd.ie/news_events/articles/trinity-wins-best-green-campus-award-2020/> [↑](#footnote-ref-6)