Executive Summary

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.

Introduction

Dublin City Business Improvement District trading as *Dublin Town*, is pleased to make this submission on the Dublin City Centre Transport Study (June 2015). *Dublin Town* is fully supportive of investment in an improved public transport infrastructure for Dublin. It is noted however that the current study lacks clarity of detail relating to key aspects of the proposals and resultant potential impacts. The study proposes radical changes to movement in the city, and represents an investment of €150m from NTA in addition to the €368m already committed to other projects such as Luas Cross City. This is a significant investment which has the potential to fundamentally change how people access the city and move within it. It is therefore imperative that we get it right.

It is recognised that demand for road space in Dublin will exceed supply at peak times of the day. Therefore, there is a need to establish priorities as to how that road space is used. There is a cogent argument to prefer sustainable transport options as well as those that yield the greatest social and economic benefit. It is also recognised that transport choices are changing internationally and that

Dublin is likely to follow suit. In this context, it is likely to be of benefit to study comparable international models to establish how other cities have managed competing transport demands successfully.

Dublin has aspirations to be a major European capital city. We have the potential to develop a city that competes on the international stage as a key destination and economic hub. If we are to realise Dublin's potential we must develop a transport infrastructure that meets the needs of the 21st century. We must be ambitious and not fall into the trap of short term thinking and sticky plaster solutions when in fact we need a holistic and developed view of what is required for the long term, and an implementation plan that meets that ambition.

Whilst many of the proposals, and the underlying objective of sustainable movement, are welcomed in principle, the lack of detail provided in the study, and indeed the short consultation period allowed (albeit it is acknowledged that this is non-statutory consultation) does not do justice to the proposals, and does not enable detailed assessment and consideration. The traffic modelling that underpins the plan was not available to us and this has given rise to significant concern amongst the business community. In this regard DublinTown is forced to reserve consideration of same until further details are provided at which point we hope the legitimate concerns of the business community can be allayed.

Business Priorities

The key priorities for Dublin Town in assessing the proposals are to ensure that:

i) Reasonable and efficient access is maintained to car parks in the city's commercial core. In this regard it is important that customers can travel to their car park of choice so for example north side shoppers can access south side car parks and south side shoppers can access north side car parks.

ii) Access is maintained to hotels for coaches, taxis and private cars. In this regard it is important that long and potentially expensive detours by taxi through the city from important access points such as the airport and Dublin port are avoided. It is therefore worth reconsidering the prohibition of taxis from College Green. While the removal of the taxi rank from College Green may be required, taxis should be able to pass through on the way to the district's hotels, stores, restaurants and bars as well as entertainment outlets.

iii) A workable system for deliveries is developed and implemented. As part of this process it is likely to be beneficial to consider waste removal also. The proposals suggest a second HGV zone, however, there are insufficient details provided as to where this will apply and how it would be implemented.

iv) Disability access is maintained in the city.

Business Impact Study

A business impact study is essential. The BID area of the city centre alone provides over 50,000 jobs as well as the generation of an estimated €1bn in taxation revenues per annum. A modest deviation from expected behaviours and reductions in employment could be very significant in the context of the overall national economy. DublinTown concurs with the Dublin Chamber analysis that car borne shoppers are the source of 31% of total revenues in the city centre. Even if one-third of this revenue was lost, currently viable businesses would find themselves struggling to survive. In assessing the impacts on total economic activity we need to consider shopping psychologies. Shoppers will want to be dropped off, or park their car within 400m of where they wish to shop and/or socialise. This will necessitate cross city movements to their car park of choice. Larger retailers note that 30% of the spend in their stores is attributable to customers who reside on the opposite side of the city. We need full and detailed consumer surveys including focus groups and detailed analysis to assess the manner in which the current proposals will impact on customer behaviour. Will customers move to alternative transport modes? Will they simply drive to other unrestricted destinations? Or will they shift to on-line shopping – in which case the majority of spend will transfer overseas along with any attendant employment and tax revenue. It would be important that the business community be fully involved in the planning, design and consideration of such a business impact study.

- Reliance on the Cordon Count

Many of the assumptions for the plan are based on the cordon count which is conducted between 7.00 am and 10.00 am twice a year. Cars passing through this cordon at that time are generally commuter cars. Cars driven by customers tend to come in to the city later in the day. It therefore appears that plans, which will impact on customer traffic, are being devised on a 24/7 basis based on commuter traffic at peak travel periods during which customer traffic is absent. It is important that in assessing traffic congestion that we differentiate between peak periods where traffic is predominantly commuter based and non-peak when there is a higher proportion of customers.

There are 10,000 public car parking spaces available in Dublin. This is the same number as Bristol which has a catchment of 430,000 while Leicester with a catchment of 330,000 has 8,000 car parking spaces. Given the relatively low number of public car parking spaces that are available in the city, it is difficult to see how these spaces are the cause of traffic congestion, particularly as they are in most use at weekends and during off peak periods. We are concerned that the plan references potential relocation of car parks. We require specific details in relation to proposals in this regard. In this context it is also worth considering that there are an estimated 13,000 car parking spaces provided to public servants at their place of work and other car parking spaces provided to private sector employees in Dublin city. These cars enter and exit at peak periods and therefore do contribute to traffic congestion. Other cities, such as Nottingham charge a levy on such car parking spaces reducing their use and adding considerably to the alleviation of traffic congestion. In the case of Nottingham, the funds generated from this levy are ring fenced and used to fund improvements in the public transport system. If similar levies were applied throughout the Dublin transport area, including out of town centres; then a significant source of funding towards the upgrading of the public transport system

could be found. It must be stated that an over-restriction of vehicle movements in the city that makes access to car parks impractical may not take cars off the road, it is likely that it will merely encourage them to travel in a different direction and towards out of town centres.

The study is confined to the city centre only, however, it would be important that the implications of proposals outside of this study area also be considered.

Investment in public transport

Dublin has experienced underinvestment in its public transport system for years. We are playing catch up, yet the levels of expenditure required to allow Dublin develop an appropriate, efficient and affordable public transport system are not included in the report. This is a concern.

It is important that we develop an integrated vision for Dublin's transport system for the 21st century and that we progress with a clearly considered workable plan for its implementation. We should not rely on temporary proposals such as Bus Rapid Transit (BRT) which is already obsolete in the planning phase. Instead we should concentrate and fund solutions which will work for the city in the longer term.

We would also advocate the additional use of technology such as apps to guide customers to their car park of choice. Such apps should also guide through traffic away from the core city centre and towards the North & South Circular Roads and the East Link Bridge which should be made toll free.

Given the current position of historically low rates of interest and the fact that the LUAS system operates without subsidy, there is considerable scope for attracting private sector finance through PPP's for the necessary developments in the public transport network.

Availability of car parking in the economic context

The Association of Town & City Management in the UK note in their document *Re-Think! Parking on the High Street Guidance on Parking Provision in Town and City Centres* that "there is a clear relationship between the quantity of car parking and footfall. Towns with higher footfall (and therefore a higher spend and better quality of offer) have more parking spaces. Indeed the report goes onto note that in fact, "they (out of town shopping centres) have used the car as a point of competitive advantage over town centres, providing cheaper bulk buying for the convenience of consumers. And if that is still too inconvenient for the 21st Century consumer, they have the choice of staying at home and shopping online. " The Dublin Development plan appears to acknowledge the importance of access, movement within the city and parking provision where it notes the intention to make it easier to access the city centre retail core as an important element of the strategy. It further proposes to develop linkages between the north and south retail cores, via the new bridges over the Liffey and via Westmoreland Street. Consistent with this objective the plan refers to car parking at section 5.1.4.7 stating that Dublin City Council will continue to implement a policy on car parking in the city that seeks to manage and provide car parking as part of the overall sustainable transport needs of the city. The Development Plan distinguishes between commuter/peak-hour parking and short term parking necessary for shopping and business. The current proposals would appear to be at variance with the Development Plan in this regard.

Questions that remain to be answered in order for a better understanding of the proposals

Amongst the questions that require to be answered are:

a) Will consumers be able to access parking facilities of their choice and travel between them without significant detours?
b) What data has been considered in the justification of proposals?
c) Have additional datasets such as pedestrian footfall and traffic counts on city centre bridges been considered?
d) Has any analysis of customer travel behaviour been taken into account in formulating proposals?
e) Will further research examining customer travel behaviour be undertaken prior to the implementation of proposals?
f) What are the key aspects attracting consumers to the city centre and have these been accounted for in the development of proposals?
g) What additional infrastructure is proposed to enable the proposed orbital routes cater for the additional traffic loading?
h) What environmental impacts are associated with the additional traffic levels on alternative routes?
i) Have alternatives such as removing the toll on the East Link Bridge been considered and included in the traffic model?
j) What are the expected traffic levels on key routes within the study area as a result of the proposals?
k) How is traffic in the wider Dublin area impacted by the proposals?
l) Which, if any, car parks may be required to relocate?
m) What alternative access arrangements will be put in place to facilitate movements from potentially relocated car parks to the city centre's retail core?
n) What access arrangements are proposed for all existing car parks?
o) What alternative access arrangements will be put in place to facilitate movements from potentially relocated car parks to the city centre's retail core?
p) What are the timeframes for the implementation of proposed freight management measures?
q) Will there be any costs to operators associated with compliance with these measures?
r) What improvements will be made to ITS and signage to help guide traffic to access the city centre?
s) If College Green is fully closed off to private cars, what alternative routes/measures are available?
t) If Burgh Quay or Bachelors Walk is closed off to private cars, what alternative routes/measures are available?
u) How will the arterial routes cope with the increase in demand when specific streets are closed off?
v) What measures have been put in place for deliveries and access for shops and businesses at the above locations as well as Stephen's Green North and Suffolk Street?
w) What are the expected traffic levels on key routes both within and outside the study area as a result of the proposals?
x) Which car parks in the city centre may be utilised as taxi ranks or cycle parking?

y) Will any car parks in the city centre have restricted access and what proposals are there for overcoming these restrictions? The report indicates that the "proposed revisions to the road network will ensure that the city remains accessible by private vehicles, particularly in relation to access to car parking in the vicinity of the north side and south side retail centres." But how will this be carried out? There are significant concerns amongst the business community that the opposite will occur?
z) What is a "second HGV zone" and how would this achieve a "reduction in commercial deliveries"?
aa) What levels of segregation is proposed for the BRT and how will this affect other transport modes?
bb) Have any of the other transport proposals in the Fingal North Dublin Transport Study been considered to meet the long term demand.
cc) If private vehicle restrictions are in place 24/7 will public transport improvements be evident 24/7.
dd) What are the timeframes for the implementation of proposed freight management measures?
ee) What is meant by the "lifetime" or "period" of the Study?
ff) Will there be any costs to operators associated with compliance with the delivery management measures?
gg) Have non-infrastructure measures to help improve the transport network such as apps, incentives etc. been considered in the Transport Study.
hh) How is the proposed €150m funding to be allocated?
ii) Where will the new locations for bus layovers and terminations be?
jj) Will a business impact study be undertaken to consider how the plans may impact on employment, tax revenue and the city's overall vibrancy and vitality?

Previous consultation

We note that Greater Dublin Area and the Fingal/North Dublin Transport plans are not integral to the current proposals. We have made detailed submissions on both of these plans and believe that the contents of both are relevant to the current proposals particularly as they relate to the necessary investment in the transport infrastructure and the inadequacy of the BRT proposals to meet Dublin's short and long term requirements.

Conclusions

It is clear that there are commendable aspects in the Dublin Transport Study. However, the report is vague in relation to some critically important elements. This gives rise to very significant concerns amongst the business community. Answers to questions regarding the key priorities for the business community namely, access to public car parks, access to hotels and greater details regarding deliveries would go a long way towards allaying the business community's concerns. We wish to work with Dublin City Council and the NTA to explore how business concerns can be conclusively addressed. We do not see this submission as our

definitive response to the proposals and intend engaging in additional consumer research to better assess the likely impacts of the proposals on the current city customer base.