



The Chartered Institute of Logistics and Transport Ireland

**Submission to the Dublin City Council for the Public  
Consultation on Dublin City Development Plan 2022-2028**

**Theme 6: Sustainable Movement and Transport**

February 2021

The Chartered Institute of Logistics and Transport (CILT) Ireland welcomes the Dublin City Council (DCC) commissioning of public consultation of Dublin City Development Plan 2022-2028. We complement the DCC on their achievements to date and support DCC with their continued good work and initiatives in promoting sustainable movement and transport.

The DCC sought views on promoting sustainable transport and active travel in Dublin. Five questions have been raised by the DCC. We address these questions in the following sections.

**1. How do we encourage more people to travel sustainably such as walk, cycle and use public transport?**

- First of all, the infrastructure planning and investment need to shift more attention on pedestrians and cyclists to promote active travel, with consideration of the full journey including walkable access routes. To avoid discontinuous standards of these facilities, planning properly funded route and network implementations are critical for modal shift.

- For public transport, increasing both quantity and quality of public transport, as well as improving multi-modal levels of integration effectively and efficiently is the key to promoting a shift to public transport. Public transport regional-wide integration requires ease of interconnections and equitable fares to increase ridership of all ages, abilities, and incomes. However, the chance of achieving a good long-term integration in a congested urban area diminishes greatly as the number of operators of transport increases. Many cities that have a degree of tendering continue to have a metropolitan operator who serves the central area almost exclusively for that reason. Transport integration of networks and operations only works effectively on the ground if the network is managed by a dedicated transport management company or if the operating company is part of the transport authority. Currently, the NTA as the regulator and policy maker in chief is working with many operators, and while this makes it harder from an integration perspective.
- Public transport operators should be the pioneer to upgrade to the cleaner Euro 6 engines and adopt eco-vehicles such as electric buses and compressed natural gas (CNG) buses.
- Land-use and transport planning is critical to achieving sustainable movement and transport in Dublin. Supporting the National Planning Framework in focusing mobility development in cities and moving away from national motorway connections is a key policy that will support DCC in reducing emissions and congestion in the city. Traffic demand management is also a key area and there are insufficient skill-levels and investments in Ireland.
- Create clear safety regulations for electric scooters and e-bikes, such as minimum age, training, and insurance. As in February 2021, the Government approves the next steps for e-scooter and e-bike legislation in the forthcoming Road Traffic (Miscellaneous Provisions) Bill<sup>1</sup>. This decision

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<sup>1</sup> Department of Transport (2021) 'Government approves next steps for e-scooter and e-bike legislation' <https://www.gov.ie/en/press-release/12185-government-approves-next-steps-for-escooter-and-ebike-legislation/>

will allow for the introduction of appropriate regulations for these types of vehicles. Once regulated properly, the need to integrate e-bikes and scooters seamlessly into the overall transport journey from door to door.

- Consider supporting mandatory training of cyclists and a minimum standard for the 16+ age group. Also, this should be considered with the sale of any bicycle electric or pedal. Training of all school-age children on safe cycling and responsible road use/safety from a young age.
- Continue with public awareness and communication campaigns, including those focused on specific segments for the transport industry and public regarding active travel and modal shift.

## **2. Is shared mobility the future for Dublin? Should we be making use of shared community cars and bicycles, rather than privately owning them?**

- Shared mobility is complementary to public transport and not its competitor. It is secondary to integrated land use and transport planning which should prioritise access to services by walking and cycling.
- For car sharing, the research study by Rabbitt and Ghosh<sup>2</sup> (2016) from Trinity College Dublin suggests that individuals in the Greater Dublin Area are more likely to join car-sharing schemes, however, outside Dublin city, there is a lack of high population density areas with suitable users. Therefore, shared mobility may not be suitable for all areas within DCC remit.
- Policy measures to promote shared mobility in Dublin should focus on infrastructure development, operation, and maintenance of cars or bicycles sharing service to support the roll-out of shared mobility in the Greater Dublin Area.

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<sup>2</sup> Rabbitt, N. and Ghosh, B., 2016. *Economic and environmental impacts of organised Car Sharing Services: A case study of Ireland*. Research in Transportation Economics, 57, pp.3-12.

### 3. Should the Dublin City Centre of the future be car free, with access only for public transport, accessible vehicles & service vehicles?

- An article in Irish Times<sup>3</sup> argued that more than 70 per cent of people who live in Dublin city centre rent, and a more walkable city with more wide footpaths, less on-street car parking and more trees are needed. This 'more walkable and car-free' approach is aligned with the DCC's compact city agenda<sup>4</sup>, which is to 'minimise wastage of scarce urban land and reduce urban sprawl'.
- However, it is also important to consider how to retain a healthy and balanced urban population in the next 10 and 20 years. More investment in transport-related issues and infrastructure investments and enforcement are needed.
- Servicing a metropolitan city like Dublin requires consideration on how freight and service vehicles can easily and safely access and operate (such as parking, cargo loading/unloading) in the Dublin city centre. (See additional note on urban freight transport attached).
- The "15-minute City" as a new concept in urban planning is receiving great traction in the media. Cities are attempting to give residents everything they need within a few minutes of their doorsteps. This concept shares ideas for making urban areas adapt to humans, not the other way around.

Some movement has been seen in cities in Europe. For example:

*"Paris is far from alone in attempting this sort of transformation. London's new "Mini-Hollands" import Dutch planning ideas that seek to reduce or block car access to neighborhood shopping hubs. Barcelona has been turning 400-by-400-meter chunks of road in areas dominated by apartment towers into mostly car-free "superblocks." Madrid has*

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<sup>3</sup> Sylvia Thompson (2016) *Time to take a fresh look at city living* in Irish Times, <https://www.irishtimes.com/life-and-style/homes-and-property/time-to-take-a-fresh-look-at-city-living-1.2782503>

<sup>4</sup> <https://www.dublincity.ie/dublin-city-development-plan-2016-2022/4-shape-and-structure-city/45-policies-and-objectives/453-making-more-compact-sustainable-city/4531-urban>

*declared plans to copy that approach, in keeping with its goal to be a “city of 15 minutes” as it recovers from the pandemic. Milan has said the same, with hopes to turn Covid-19 bike lanes and sidewalks permanent as its economy restabilizes. But turning the 15-minute city into a truly global movement will require a big battle over a core urban tension: the primacy of the car.” (<https://www.bloomberg.com/news/features/2020-11-12/paris-s-15-minute-city-could-be-coming-to-an-urban-area-near-you>)*

**4. 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?**

- A proper bicycle network design in urban areas is required in Dublin to ensure road safety in the city.
- This includes comprehensive, region-wide integrated networks of paths and lanes for cyclists, including special provisions at intersections (traffic signals, advanced stop lines); extensive bike parking on sidewalks, on-street bike-corrals, and at public transport stations (Buehler and Pucher,2016)<sup>5</sup>.
- Level of Service criteria such as in Fruim (1971), could be used to assess which pedestrian areas may be suitable to incorporate cyclists and which should not. If cyclists are permitted, it is suggested that clear signage is provided indicating to cyclists that they are entering a pedestrian priority zone. If cyclists are not permitted, signage should be clearly displayed. In addition, directional signage should be provided guiding cyclists along an alternative route. Consideration into surfacing either texture and/or colour to clearly indicate pedestrian only zone could be made. Regarding speed limits, the uses of proper engineering design and visual interest

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<sup>5</sup> Buehler, R. and Pucher, J. (2016) Sustainable Transport in Vienna.

has the potential induce a suitable speed limit for cyclists. See Crow's "Design Manual for Bicycle Traffic" for guidance on design speed for bicycle infrastructure.

**5. 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 provision of electric vehicle charging points should not come before the proper consideration for land-use and transport planning in the city. As per Design Manual for Roads and Streets, the hierarchy of mobility is walking, cycling, public transport, and car. Therefore, only after exploiting these improvements should cars (including electric vehicles and charging points) be considered.
- The provision of car charging points could be considered in strategic areas identified by DCC to encourage residential living, especially family living in the city.
- An electric vehicle charging point network should be developed by DCC in conjunction with the ESB to identify suitable locations for such services.
- This point, Point 5, should not conflict with Point 3, "*Should the Dublin City Centre of the future be car free, with access only for public transport, accessible vehicles & service vehicles*".

**Additional Note on Urban Freight Transport**

The Dublin City Council (DCC)'s background report on Sustainable Movement and Transport, however, focused more on the passenger transport side. CILT would like to raise the importance of the freight transport sector.

Road transport is the dominant mode of moving freight in Ireland. Dublin, as the capital city of Ireland, is also served as a port city with critical roles in the post-Brexit era. Increasing urban freight distribution and road-intensive logistics activities in the city have led to a series of environmental and social issues in urban areas, such as increasing greenhouse gas emissions, noise, air pollution, traffic congestion, infrastructure deterioration, historical urban area preservation, the quality and safety of residents in urban areas.

Sustainable freight transport in the city will make a positive impact on the environmental, social, and economic sustainability of the communities they serve. However, the freight transport in the Greater Dublin Area requires more supportive policies and initiatives to increase the industry awareness and readiness towards sustainable operation and low-carbon transition.

We acknowledge that innovative urban freight trials have been carried out by DCC through the Smart Dublin project, such as urban eco-hubs, cargo bikes, and biofuel vehicles. These measures could eliminate delivery vehicles dispatched to the city centre. However, limited parking bays and loading/unloading times, and expensive operating costs are also facing logistics service providers in the city to maintain a high level of service.

A few points we would like to raise the attention to the Dublin City Development Plan 2022-2028.

- We would seek the inclusion of an Urban Freight chapter to be included in the Development Plan to reflect the importance of servicing a metropolitan city whose policies include “encouraging global HQs to locate in Dublin” and to “facilitate tourism” which has been identified as

“key economic driver”. We would see synergies with the City Economy and Enterprise chapter and the Movement and Transport chapter.

- Servicing a metropolitan city like Dublin requires consideration on how freight can easily access and egress Dublin Port. Dublin Port Masterplan, 2018 revised anticipates between 2020 and 2029 year on the year growth rate of 5.0%. “A 2011 origin and destination study carried out for Dublin Port Company determined that 21% of all goods going through Dublin Port are within the M50 area.”<sup>6</sup> Therefore DCC should consider that Dublin city remains accessible to key servicing requirements from Dublin Port and the M50. (See additional note on urban freight transport, attached).
- Road safety in urban areas could be a strong focus for Dublin in the next 10 years. Urban logistics operations could have a great impact on vulnerable road users. Safety standards should be developed for the logistics and construction sectors through the HGV safety standard permit into the city.

For example, London has safety standards that targeted the logistics and construction sectors through the HGV Safety Standard Permit Scheme. From 2020, a safety permit to enter or operate in the city is mandatory for heavy goods vehicles of more than 12 tonnes. The permit classifies the safety of an HGV based on how much the driver can see through their windows. Additional vehicle safety technologies will be required from 2024. London also adopted the Fleet Operator Recognition Scheme (FORS) accreditation for all heavy vehicles contracted in public procurements. FORS is a voluntary accreditation scheme that promotes best practices for commercial vehicles. By 2024, all operators must be certified by the higher FORS accreditation, which includes vehicle safety

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<sup>6</sup> [https://www.dublinport.ie/wp-content/uploads/2018/07/DPC\\_Masterplan\\_2040\\_Reviewed\\_2018.pdf](https://www.dublinport.ie/wp-content/uploads/2018/07/DPC_Masterplan_2040_Reviewed_2018.pdf)



equipment. TfL is also investing in the training of drivers and in communication campaigns for the industry (OECD/ITF, 2020<sup>7</sup>).

- Cargo bike for urban delivery requires a proper bikeway network design in urban areas to ensure road safety in cities.
- Infrastructure improvements for PSV & HGV, development of segregated bus lanes and cycle paths similar to the Netherlands.

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<sup>7</sup> ITF (2020), “Best Practice for Urban Road Safety: Case Studies”, International Transport Forum Policy Papers, No. 76, OECD Publishing, Paris. Available at <https://www.itf-oecd.org/sites/default/files/docs/best-practice-urban-road-safety.pdf>

## **About CILT Ireland**

The Chartered Institute of Logistics and Transport in Ireland (CILT) is the independent professional body for people engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. CILT is a member of the wider CILT International family which has offices in over 30 countries and 33,000 members worldwide. CILT has a number of specialist forums, a nationwide structure of locally-based groups and a Policy Committee which considers the broad canvass of transport policy. The policy committee is formed of industry experts whose insights and inputs will bring together a conscious discussion on the subject in hand. As a professional body, CILT does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

## **CILT Policy Research Agenda in 2021**

Increasing demands for emissions reductions and mitigation will put greater pressure on transport activities for the movement of people and freight. The transport sector in Ireland will have to rethink on climate change and adapt to this new climate reality. In 2021, CILT will continue the research that analyses climate change implications for Ireland with particular reference to the European Green Deal and the Climate Action Bill to achieve carbon neutral by 2050.

## About the Authors

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Eoin is Associate Professor of Logistics and Supply Chain Management at Edinburgh Napier University. He previously led the National Institute for Transport and Logistics (NITL) at Technological University Dublin. He previously worked with a number of UK universities including the University of South Wales. Eoin has carried out research and published peer-reviewed journal articles on sustainable supply chains, collaboration, and urban logistics.

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Sabrina is a Ph.D. candidate at Technological University Dublin in Ireland. Her current doctoral research focuses on sustainable urban logistics. She holds an MSc degree in logistics and supply chain management from Cranfield University in the UK. Sabrina previously worked as a research assistant at the Asian Institute of Supply Chains and Logistics at the Chinese University of Hong Kong.

### Rachel Ivers, Policy Committee Deputy Chair

Rachel is a Public Transport Analyst in the National Transport Authority. She previously worked in engineering consultancies in Ireland and the Netherlands. She gained her BSc. in Spatial Planning from DIT and MSc in Transport, Infrastructure and Logistics from Delft University of Technology, the Netherlands. She is also a committee member of the Irish branch of the Transport Planning Society.

### Tim Hayes, Education and Training Committee Chair

Tim is a member of the Institute's Council, Policy Committee, and is Chair of its Education and Training Committee. Former CEO of Bus Eireann and CILT in Ireland. Over forty-five years has held a range of senior management positions in transport and tourism and has lectured at third level. He holds BE, M.Eng.Sc. and MBA degrees and is a Fellow of the Institute.

### John Henry, Membership Committee Chair

John is a Chartered Engineer, and Director and Chief Executive of the Dublin Transportation Office (which integrated into the establishment of the National Transport Authority in 2009). John has had a wide-ranging career in the area of transportation in both the public and private sectors in Ireland and abroad.

### Mick Curran, CEO of CILT Ireland

Mick has for the last three years been the CEO of the Chartered Institute of Logistics and Transport (CILT). Additionally, prior to joining CILT, Mick spent 24 years as a member of the Defence Forces serving in a variety of roles both at home and overseas.