



Decongesting Dublin 2003

The Dublin Chamber of Commerce Submission to
The Dublin Transportation Office
Travel Demand Management Study

May 2003

Issues

The Health of City Centre Retail

The City Centre's viability as Ireland's premier retail destination is under substantial threat primarily due to the lack of traffic infrastructure. The trend has been in progress for some years but has accelerated in recent times.

While the reduction in city centre congestion that demand management aims to bring would help facilitate a vibrant city centre retail sector, not all of the measures as proposed would be of benefit to retail economic activity. The impact of any new demand management measures on city centre retail must be continually assessed.

Travel Demand Management Measures

Congestion Charging

There is clear merit in using congestion charging to reduce city centre congestion through an incentivising of a switch to public transport. When considering the use of congestion charging all proposals should have regard to (a) its likely negative effects on city centre retailing (b) the absence of public transport options for many commuters and (c) the high cost of introducing a scheme.

While the introduction of congestion charging in London has seen a reduction of traffic in the charged zone by 20% and delays have been cut by nearly 30%, the scheme has had a negative impact on the retail and theatre sectors situated in the congestion zone. In the latest figures from London, three quarters of the retailers inside the congestion zone are reporting that year-on-year takings are down. A *London Evening Standard* poll indicated that 25 per cent of these retailers are planning to relocate outside of it.

When one considers that vacancy rates on Dublin city centre streets have been steadily increasing over the past decade, the potential negative impact of congestion charging on city centre retailing is clear.

With this in mind, the priority of congestion charging should be to change the travelling habits of those commuting into the city centre, not to disincentivise consumers from shopping in the city.

While public transport provision has without doubt increased dramatically in recent years, commuter demand still outstrips supply. If introduced and in order to be successful, congestion charging will further increase the number of commuters using public transport. It follows that the capacity of the public transport system will have to be significantly increased before the introduction of congestion charging could be realistically considered.

In a recent Chamber survey, over 60% of businesses said they wanted to see improved public transport before they would support the introduction of congestion charges, 26% said they would never support such charges and only 11% said they would support their introduction now.

When asked which public transport projects needed to be operational before congestion charging could be introduced, 58% said more QBCs and 56% said a mix of more QBCs, Luas and metro. Furthermore, when asked what would convince them to switch to public transport, 42% of businesses said better bus frequency, 38% chose integration of ticketing and services, over a quarter identified real-time information on the QBCs, while only 16% of businesses said that congestion charges would push them towards making the switch from private car to public transport.

Delivery Times

The Director of Traffic has restated his intention to introduce restrictions on commercial delivery vehicles on certain important routes in the city centre. The proposals limit the hours during which commercial vehicles can make deliveries outside of the existing commercial delivery bays on these key routes to 1900hrs-0700hrs and 1000hrs-1230hrs. The restrictions will be reviewed after 3-4 months to assess their suitability for the other key arterial routes in the city centre.

The Chamber strongly supports all measures that will reduce congestion in the city centre, but wants to minimise the potential negative effects of these proposals on

the cost of doing business in the city. To this end, it is vital that potential problems are addressed before the introduction of any new delivery rules and that the impact of the measures is comprehensively monitored, through a variety of measurements including traffic speeds, sales figures, customer levels. Any problems that subsequently arise must be addressed. We would recommend the introduction of a delivery code of practice that will be adhered to by both deliverers and premises receiving these goods.

Given that the first in-depth study of HGV movements in the Greater Dublin Area is currently underway, reporting to the DTO, we recommend that the findings of this report should inform the commercial delivery regulations.

Park and Ride

The volume of cars travelling into the city centre can be meaningfully cut through the introduction of park and ride initiatives. While the potential benefits of park and ride have been widely publicised, there has been disappointingly slow progress in developing such schemes.

While tax breaks have been introduced to promote the building of park and ride car parks, there would appear to be a case for subsidising public transport services that are specifically serving park and ride routes.

One method of promoting park and ride would be through using/further developing the car parks, that are based along well-serviced public transport routes, of facilities that are not used during the day (Churches, sports clubs).

Car-parking Spaces

Through the careful management of car parking spaces in the city centre, a great deal can be done to reduce unnecessary car trips and improve city centre traffic flows. There are a number of initiatives that could be progressed.

An innovative approach would be to limit the number of car parking spaces being created in new developments, especially office developments and those developments served by high quality transport corridors.

There should be a comprehensive study carried out into the more effective utilisation of public sector carparking spaces. At many peak periods of the year, and on weekends, a vast reserve of city centre car parking exists in the form of public sector car parks remains underutilised.

Imposition of taxes or making the parking spaces more costly to employees e.g. BIK on spaces given to employees, will not act as a disincentive to drivers who have already paid significant amounts of money for their car and insurance. Instead it will merely increase the cost demands on hard pressed business. It is better to create the legislation to control the uses and tariff structures of car parking facilities.

A proven way to encourage car-pooling is for firms to give favourable treatment to cars that are used for car-pooling. Notwithstanding the problems of policing the scheme, for companies with a limited number of car parking spaces, a generous number of spaces should be allocated to car-pooling employees. Where larger carparking facilities exist, car parking space located in prime positions, such as beside the entrance, should be allocated to car-pooling employees's cars.

It is vital to the continued health of city centre retailing that demand management measures must not discriminate against shoppers' cars travelling to the City Centre as opposed to suburban centres. While city dwellers have public transport options, some feel that car ownership should be restricted by way of a substantial increase in the local authority motor tax for all cars in the city, which is unrelated to engine capacity. Any such monies, which are raised, should be re-invested in the necessary road traffic infrastructure to ensure access to the City Centre. It is accepted that the provision of new enhanced services such as a City Centre Express way could be tolled to help finance the capital investments.

Many apartments in city centre rent out their car-parking space to commuters. This is not why apartments were given car-parking spaces. All such spaces should be put

into the city council pool. Thus facilitating ongoing essential development while limiting the number of commuters which can come into the City.

Facilitation of City Centre Living

Encouragement of higher densities in city centre residential developments

With a view to promoting both mobility and the move back into the city centre, we support the abolition or reduction of stamp duty on second hand homes.

Encouragement of Families to live in the City Centre. There are no suitable high density housing for families of various socio-economic groupings. Apartment planning permissions should insist that a certain number of family type high density housing units be built of adequate size

Car-Pooling

Undoubtedly car-pooling would bring benefits in the form of a reduction in the number of cars being used to commute to work. However, the potential impact and attractiveness would appear to be limited. In a recent Chamber survey only 18% of businesses said that car-pooling had a large role to play in reducing congestion, while 56% said such initiatives would have a very small impact. One of the main drawbacks of such a scheme is that many businesses use their car during their working day to travel to meetings. Only one member of a car-pool can use the vehicle for such purposes during the working day.

There is merit on carrying out a cost-benefit study on the opening up of bus lanes to the multiple occupancy vehicles.

Supply-side Initiatives

Public Transport Operational Hours

While patterns of work have changed with an increasing number of employees coming into work from 7am on and a similar number leaving after the traditional end-work hours of 5-6, there is a growing demand for frequent public transport services outside of the rush hour periods of 0730hrs-0900hrs and 1630hrs-1800hrs. If this growing demographic is to be persuaded to leave their car at home and opt for public transport, then the hours of operation of "quality" services, most importantly meaning frequent vehicles, must be extended.

School-based Initiatives

Given that roughly 20% of peak hour traffic is accounted for by parents dropping their children to school, if these trips could be moved to a time outside of the 8-9am peak, congestion would be reduced. The Chamber would recommend that a study of the benefits of changing school opening hours to either 8am or 10am, or a similar off-peak time, should be undertaken.

An alternative scheme would see the size of the existing school bus service increased. The current school bus services keep many cars off the road by providing a safe means for children to get to school. A feasibility study for the expansion of this service should be carried out.