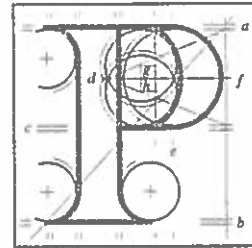


Our Ref: 29S.JA0039
P.A.Reg.Ref:

Your Ref:



**An
Bord
Pleanála**

Dolores Murphy & John Graham
Irish Wheelchair Association
Áras Chúchulainn
Blackheath Drive
Clontarf
Dublin 3

22nd February 2018

Re: Development of a new civic plaza and ancillary traffic management
measures at College Green,
Dublin 2.

Dear Sir/Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

pp 
Kieran Somers
Executive Officer
Direct Line: 01-8737107

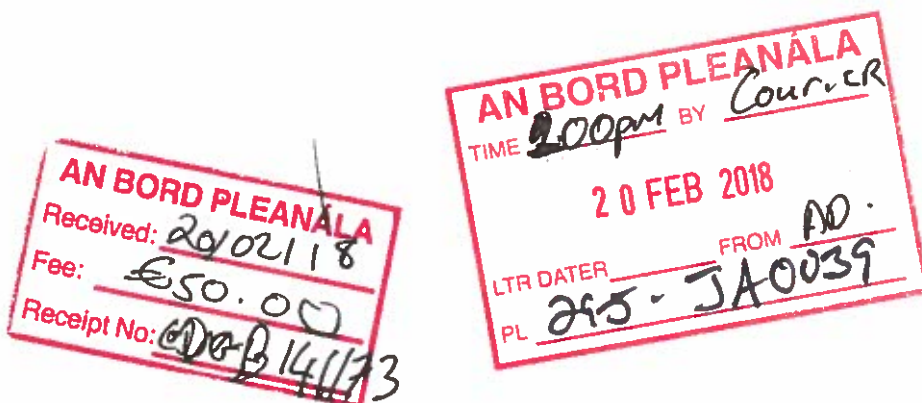
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Irish Wheelchair Association

Submission to An Bord Pleanála re College Green Plaza Design

February 2018



The Irish Wheelchair Association (IWA) Submission regarding the design of the planned College Green Plaza is underpinned by Government Policy and Strategy documents.

The following Government policy and strategy documents emphasise and support a Universal Design approach that accommodates all public access requirements and provides safe zones within public spaces to protect and give confidence to the users of those spaces.

1. Dublin City Council Public Realm Strategy 2012

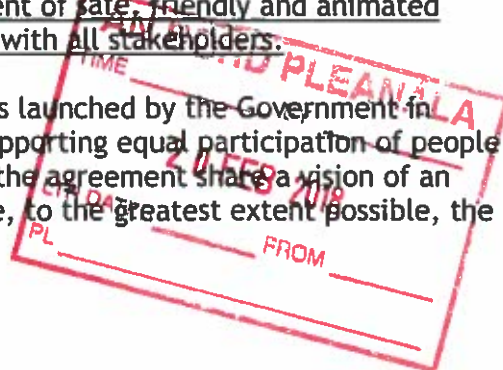
<http://www.dublincity.ie/sites/default/files/content/Planning/Documents/YDYVPublicRealmFinal.pdf>

The DCC Public Realm Strategy is underpinned by the 7 Principles of Universal Design which are seen to be at the core of the Strategy. The 7 principles of Universal Design for designing a product or an environment are as follows; Equitable Use, Flexibility in Use, Simple and Intuitive Use, Perceptible Information, Tolerance for Error, Low Physical Effort, Size and Space for Approach and Use. At the conclusion of the Public Realm document there are some guidelines as to how each Principle can apply to a design brief.

The DCC Public Realm Strategy makes them following points;

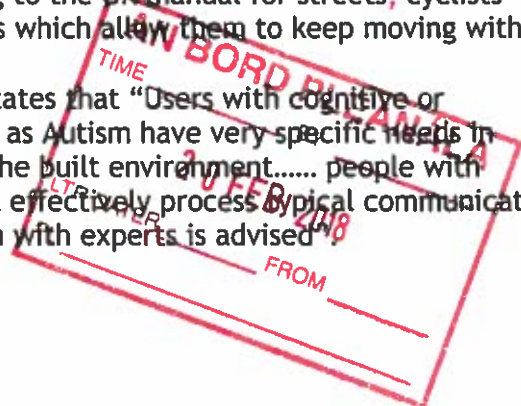
- “People don’t like spaces where they don’t feel safe. The design and use of the public realm affects how safe and secure people feel”
- “Public spaces must be welcoming and accessible to all people in society irrespective of their age, gender or ability. How public spaces meet the needs of those with access difficulties as well as their attractiveness to groups such as children or the elderly has to be considered and developed.”
- “Dublin City Council’s vision for a public realm; is the ease by which people of all ages or abilities can utilise a specific space. Universal Design Principles will be used to design create and deliver spaces that are safe, easy to navigate and can easily facilitate daily life and business.”
- “Because the public realm is so essential to the everyday experience of the city, how it is planned, designed and managed is very important.”
- “The aims of the Public Realm Strategy are: “to detail the importance, character and current issues affecting Dublin’s public realm; and to develop an agreed vision that is shared by those who use it, design it, build it and manage it. The Public Realm Co-ordination Group advocates the use of Universal Design Principals as a standard for planning and design. Using these will deliver public space that is safe and easy to navigate, thus increasing Dublin’s attractiveness to business and as a place to live.” The Strategy emphasises the development of safe, friendly and animated environments through consultation with all stakeholders.

3. The National Disability Strategy (NDS) was launched by the Government in September 2004 with the overall aim of supporting equal participation of people with disabilities in society. The parties to the agreement share a vision of an Ireland where people with disabilities have, to the greatest extent possible, the



opportunity to live a full life with their families as part of the local community free from discrimination.”

4. **National Disability Inclusion 2017-2021.** A consultation process identified priority themes to be addressed by Government including a commitment to developing actions at community level to build and sustain for disability-competent and welcoming communities that are based on the principles of Universal Design.
5. **National Disability Authority & Trinity Haus “Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland” 2012,** research report document at <http://universaldesign.ie/Built-Environment/Shared-Space/Shared-Space-Full-Report.pdf> The proposal for College Green that pedestrians and cyclist occupy the same space brings the College Green Plaza into the concept of a Shared Space design. The NDA and Trinity Haus document, while not specifically giving direction re pedestrians and cyclists sharing the same space, makes the following points;
 - Within the Irish context there is very little or no awareness of shared space design and use.
 - “There needs to be a debate about what constitutes a *people friendly environment* as it cannot be taken for granted that there is currently a shared consensus on what defines a high quality people friendly built environment”. (12.1.1 pg 128).
 - Universal design is an approach that ensures the design and composition of an environment which creates a space that can be accessed, understood and used to the greatest possible extent by all people regardless of their age size ability or disability.
 - A Key Finding (12.4.6 pg 140) states that the needs of various users and providers often conflict. The urban environment is used by the widest variety of stakeholders and it is paramount that this environment enables all users to live healthy lives and to participate fully in society.
 - A Key Research Finding (12.6.10 pg. 158) states that “The Road Safety Authority uses a model that calculates that the cost to the State for the average road fatality is approx. €2.5 m when one considers a range of issues including emergency services, medical treatment, burial costs, insurance and loss of tax to the state and other hidden costs”.
 - Regarding cyclists the report states, 8.2.8 pg 103) “Cyclists are also considered to be vulnerable road users who tend to try to avoid heavy traffic flows; however increased pedestrian traffic can also pose a collision hazard for cyclists..... According to the UK manual for streets, cyclists prefer direct barrier free routes which allow them to keep moving without having to stop”.
 - A Key Finding (12.4.5 pg 140) states that “Users with cognitive or developmental difficulties such as Autism have very specific needs in relation to navigating through the built environment..... people with developmental disorders do not effectively process typical communication signals & therefore consultation with experts is advised”



Irish Wheelchair Association;

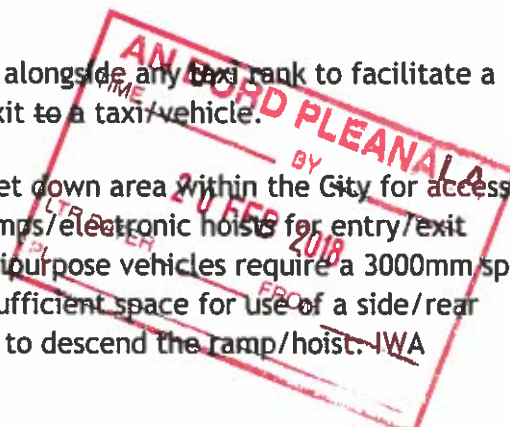
Recognising the unparalleled Public Policy support as outlined above and to support the development of inclusive communities and civic spaces that are designed to be responsive to the varying needs and requirements of users, Irish Wheelchair Association makes the following recommendations listed below to be considered by the planners regarding the design of the College Green Plaza.

Recommendations made and guidance given within this Submission are taken from *Irish Wheelchair Association Best Practice Access Guidelines* edition 3 2014 (BPAG 3 2014) available to download at <https://www.iwa.ie/downloads/about/iwa-access-guidelines.pdf> Irish Wheelchair Association is referenced as “IWA”.

Irish Wheelchair Association makes the following recommendations;

Arrival to the Plaza:

1. **Cycle Lane;** a Key Finding of the NDA Shared research study (12.4.6 pg. 140) states that the needs of various users and providers often conflict. The urban environment is used by the widest variety of stakeholders and it is paramount that this environment enables all users to live healthy lives and to participate fully and safely within their community. Within the College Green Plaza IWA can anticipate that cyclists coming into that space are on a journey, moving from one place to another, possibly at speed, whereas the intent of a public plaza is that people will linger, spend time.... thus creating a conflict of intent and potential danger to vulnerable plaza users if the public space is shared without clear division with any mode of transportation. IWA recommends that cyclists should not be allowed cycle through the public plaza and instead be required to dis-mount.
2. **Accessible Parking Bays;** IWA queries the number and design of the accessible parking bays that will be provided adjacent to College Green? At present accessible parking adjacent to College Green is provided on unsuitable cobble paving. Arrival to the Plaza for persons with restricted mobility poses significant difficulty. While the LUAS is very accessible, local buses can only transport one passenger who is a wheelchair user, in addition ramps on buses regularly malfunction making a journey by bus unpredictable and restricted to one person at a time. IWA recommends a minimum of six accessible parking bays adjacent to the College Green Plaza that are designed as outlined in IWA BPAG 3 2014 Figure 5 on page 24.
3. **Taxi stands;** provide a dropped kerb alongside any taxi rank to facilitate a person using a wheelchair to entry/exit to a taxi/vehicle.
4. **Taxi/vehicle set-down;** there is no set down area within the City for accessible taxis/multi-purpose vehicles using ramps/electronic hoists for entry/exit purposes; these accessible taxis/multi-purpose vehicles require a 3000mm space to one side and to the rear to allow sufficient space for use of a side/rear access ramp/hoist and for the person to descend the ramp/hoist. IWA



recommends that an accessible set-down area is provided adjacent to the College Green Plaza. See IWA BPAG 3 2014 Figure 5 on page 24.

5. **Accessible bus stops;** require all bus stops that are in the vicinity of the College Green Plaza to be accessible bus stops with the higher kerb in situ.
6. **Safe Spaces;** Provide clear separation along with designated crossing points between pedestrian areas and any mode of transportation operating within the College Green Plaza. Clear signage should be provided at these specific points. Do not allow a situation where any mode of transportation is sharing circulation space with pedestrians/users of the Plaza i.e. vehicles accessing the Bank of Ireland or a cycle lane, though the recommendation is to require cyclists to dismount and not to provide a cycle lane.

Moving through and about the Plaza:

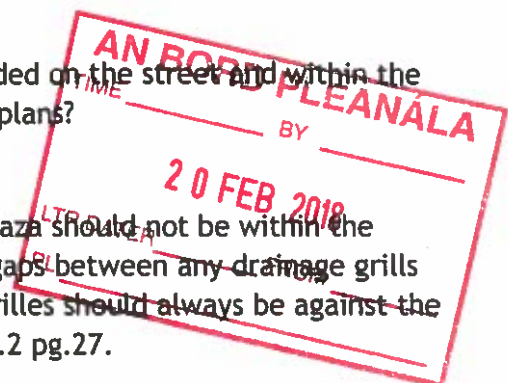
7. **Paving:** the new granite paved surface to be provided on College Green should have non-slip properties. There should be a colour differential and clear division between the pavement and any carriageway i.e. at the Bank of Ireland where we understand vehicular traffic will continue to access the bank premises.
8. **Raised Pavements:** Should raised pavements be provided at any location i.e. to create a clear division between pedestrians and any mode of transportation within the Plaza then dished crossings, level with the carriageway, on opposing sides must be provided at these locations. Kerb dishings to have gradients no steeper than 1:12. Tactile paving should also be appropriately provided. Do not use metal tactile paving which is hard underfoot and difficult to navigate for wheelchair users, slippery, when wet and difficult to identify within the granite paving. At any location a minimum clear pavement width of 2m free from street furniture, planting, refuse bins etc. is required. See IWA BPAG 3 2014 4.2 pg. 27.
9. **Information and Signposting:** Provide clear sign posting to all crossings, amenities and transportation within the surrounding areas.

Spending time within the Plaza:

10. **Seating;** seating provided should be no lower than 450mm from ground level with a minimum of 450mm seat depth and with a heel space of 100mm to allow for easier rising from the seat; arm rests should be provided as they assist a person to sit into and to rise from the seat. Avoid square sharp edges. Consider perch type seating that is slightly angled forward. A clear space of 1400mm in depth and 900mm in width is recommended adjacent to the seating to allow a person using a wheelchair to position alongside. See IWA BPAG 3 2014 4.2.2.7 pg.28 Shelter; provide open style shelter in conjunction with seating perhaps

on the style of a wishing well that is open and divided into sections that contain individual seating areas.

11. **Picnic Style Tables;** If it is the intention to provide picnic style tables and seating then the height of any picnic table provided should be between 750mm-800mm and include a section of the table that has no seat with clear knee space of 700mm beneath. Cantilevered ends on picnic tables facilitate wheelchair users. The seat height should be within 460-480mm from the ground and minimum depth of the seat should be 450mm. The back support of the seat should be a minimum 455mm in height. See IWA BPAG 3 2014 Figure 31 pg.98.
12. **Pathway width/street furniture;** the location of any seating should not compromise the path width required for wheelchair users to easily pass alongside the seating. IWA recommends a minimum path width of 2000mm to allow two wheelchair users to pass each other going in opposite directions. A minimum clear path width of 1500mm accommodates a wheelchair user and a person walking alongside. See IWA BPAG 3 2014. 4.2.2.7 pg. 28 and 4.2.2 pg. 27. The recommended clear path width is always a minimum of 2000mm; street/café furniture ought not to encroach into this width.
13. **Kerb or no kerb;** The plans indicate that there will be no kerbs within the College Green Plaza. Should the plans change and kerbing be introduced, then crossing points, with dished access that is level with the carriageway and appropriate tactile paving always on opposing sides to facilitate people using wheelchairs and other mobility aids.
14. **Bollards;** if bollards are used at any location they should be a minimum of 1000mm in height, 250mm in width and contrast with the background in colour and tone. Adjacent bollards should not be linked with a chain or rope of any type. See IWA BPAG 3 2014 4.2.2.8 page 29.
15. **Crossing points;** provide safe designated crossing points within and to the Plaza and at any intersections where transportation modes and pedestrian traffic might meet.
16. **Lighting;** query what lighting will be provided on the street and within the Plaza, there is no lighting indicated in the plans?
17. **Drainage;** any shores located within the Plaza should not be within the direction of travel or within any crossing; gaps between any drainage grilles should be no wider than 10mm. Draining grilles should always be against the direction of travel. See IWA BPAG 3 2014 4.2 pg.27.



18. **Bins**; bins provided on the street should be easy to use by all and ought to be located outside of the travel route and should not reduce the path width
19. **Tree planters**; should be located/recessed so as not to reduce the width of the pathway; a rounded planter profile is recommended rather than a square type.
20. **Accessible WCs**; provide accessible WC facilities including a Changing Places WC adjacent to the Plaza. Such facility could be provided by DCC in partnership with a local business that is open throughout the day/evening. See <http://www.inclusionireland.ie/changing-places-ireland>
21. **Businesses**; IWA recommends approaching any business that is currently operating on the street where there is no level access available into their premises to use the Plaza upgrade as an opportunity to create an accessible entrance.
22. **Management**; of the Plaza should ensure that businesses do not locate tables/chairs on the pathway which would impede the use of the pathway by a person using a wheelchair or other mobility aid.

Dolores Murphy & John Graham
Irish Wheelchair Association February 2018

