



NCBI

Working for People with Sight Loss

The Secretary,
An Bord Pleanála,
64 Marlborough St.,
Dublin
DO1 V902

NCBI Services,
Whitworth Road,
Drumcondra, Dublin 9
01 830 7033
01 830 7787
info@ncbi.ie
www.ncbi.ie

AN BORD PLEANÁLA	
TIME 16.45	BY Hend
07 DEC 2017	
LTR DATED	FROM Sm
PL	

Thursday 7th December 2017

Dear Sir/Madam,

I enclose NCBI's submission with regard to the proposed pedestrianisation of College Green, which explains our concerns about the plans submitted to you by Dublin City Council. (DCC)

Our submission explains the grounds of our appeal against the granting of planning permission for the plans, as they now stand. It also gives the reasons, considerations and arguments on which our appeal is based.

Please find the following documentation in this envelope:

NCBI's May 2016 submission to DCC, which highlighted our concerns about the plans, and included a request for meaningful consultation.

The acknowledgment, by DCC, of NCBI's submission.

The fee of €50.

I will hand-deliver this submission, this evening, to your offices on Marlborough Street.

Best regards,

Fiona Kelty

Fiona Kelty
Access & Awareness Coordinator
Direct dial: 01 8821950

AN BORD PLEANÁLA	
Received:	7 th Dec 2017
Fee:	€50 - cash
Receipt No:	B141150

Subject of Submission:

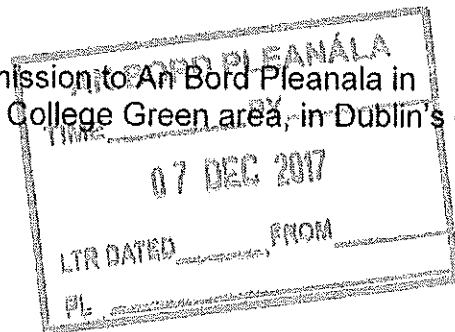
NCBI Objections to DCC's College Green Pedestrianisation Plans

Date: 5th December 2017

Introduction

NCBI, the national sight loss agency, is a not for profit charitable organisation in Ireland which provides support and services nationwide to people experiencing sight loss. We also provide a range of services to public and private organisations to enable them to make their services accessible to people who are blind and vision impaired.

NCBI welcomes this opportunity to make a submission to An Bord Pleanála in relation to the proposed pedestrianisation of the College Green area, in Dublin's city centre.



Facts and Figures:

"The Cost of Sight Loss: The Economic Impact of Vision Impairment and Blindness in the Republic of Ireland", [1] which was commissioned by NCBI and published in September 2011, established that the number of people with mild and moderate sight loss, as well as total blindness, is far greater than previously thought and is on the rise as our population ages.

In 2010, there were 224,832 people with impaired vision in Ireland. This figure is set to rise by 21% by 2020, when 5% of the population (or 271,996 people) will have a vision impairment. [2]

95% of people have mild or moderate sight loss, with 40% experiencing mild vision loss which will start when their level of vision no longer permits them to drive."

References:

[1] Deloitte Access Economics, 2011, The economic impact of vision impairment and blindness in the Republic of Ireland, Report for NCBI, Dublin.

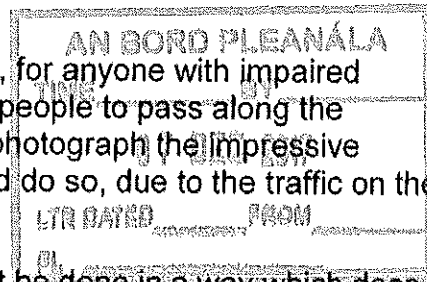
[2] (1) Jackson, AJ and O'Brien, C (2008) Eyes on the Future Ireland 2008 (www.ncbi.ie/about-ncbi/ncbi-publications/eyes-on-the-future-report)

General Idea of Pedestrianisation

NCBI appreciates the very good intention of DCC, and the College Green Design Team, to make this area a pleasant recreational and cultural area for pedestrians, and to make it accessible to all citizens and visitors.

Currently, it is a very uncomfortable area to negotiate, for anyone with impaired vision. Large queues at bus stops make it difficult for people to pass along the footpaths. Tourists (or locals) who wish to admire or photograph the impressive buildings and monuments have no space to stand and do so, due to the traffic on the road, and the congestion on the footpaths.

Pedestrianisation would be very beneficial, but it must be done in a way which does not put anyone at risk.



NCBI's Objections to the Plans for College Green

1. The proposed use of tactile paving as a boundary between pedestrians and traffic, instead of a kerb.

Bicycles and trams are very difficult to hear. Although there are a tiny minority of people with impaired vision who have extremely good hearing and excellent reflexes, most people experiencing sight loss are over the age of 65, have average or below average hearing, slow reflexes, and often have other disabilities, too. **Some do not notice changes in texture underfoot.**

People with impaired vision need a kerb between the pedestrianised area and the area where trams, cyclists and buses will operate. Currently, tram lines for the Luas Cross City run along the upper boundary of the area where the pedestrian plaza is planned, that is: from Nassau Street, passing the front gate of Trinity College, and onwards along Westmoreland Street. In the plans, it is proposed to also have a cycle track and bus lane following the same route. The plans propose that tactile paving

will be provided in place of a kerb, between this area where traffic will run, and the pedestrian plaza.

NCBI considers that this is just too dangerous for people with impaired vision.

The Centre for Excellence in Universal Design commissioned TrinityHaus to research the idea of Shared Space. One of their findings was that tactile paving is not as effective as a kerb, when providing Safe Space for vulnerable pedestrians, within Shared Space schemes. (See Appendix A.)

If a person with impaired vision does not detect the tactile paving, he or she will be at risk of being struck by fast cyclists on the cycle lane, or by a tram, or by a bus.

Nothing should take precedence over pedestrian safety.

Removal of a kerb at road crossing points, to facilitate people using wheelchairs, buggies etc., is of course acceptable. But to have no kerb edge between a pedestrian area and traffic, for a very long distance, is neither necessary nor safe.

2. The proposed plans for management of conflict between the requirements of cyclists and pedestrians.

NCBI has serious concerns about the admission of cyclists to the pedestrian plaza, and to the adjacent areas.

(a) DCC has stated that it intends to provide signalised crossings which will be for pedestrians and cyclists **only**, in areas of conflict between the two groups, where there is no vehicular traffic.

Based on the observation of current usual behaviour of both pedestrians and cyclists, this is extremely unlikely to be effective.

Traffic lights work well to control cars and other vehicles, which must display registration plates, and can therefore be identified if they disobey the lights. Drivers are also conscious that other road users are more vulnerable, and are usually aware that they could injure or kill someone, if they disobey traffic lights.

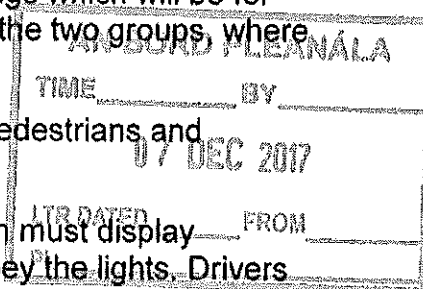
However, very many pedestrians frequently disobey the "red man" signal, if there are no vehicles coming. This is regarded as normal practice, and actually is not illegal.

Cyclists also very often disobey red lights at pedestrian signals. They are not at risk of being hit by a vehicle, at pedestrian crossings, as they would be at a junction. So they ignore the red light.

Pedestrians will cross, against the lights, even if they see a cyclist coming. They don't fear being hit by a cyclist as much as they fear being hit by a car.

Cyclists will go through pedestrian crossings, even if they see a pedestrian on the crossing, as they feel confident that they can avoid the pedestrian.

Planners need to base their plans on the reality of how people **actually** behave, not on ideals of how people **should** behave.



(b) Proposed "Pedestrian priority" shared cycle/pedestrian route along one side of the Pedestrian Plaza.

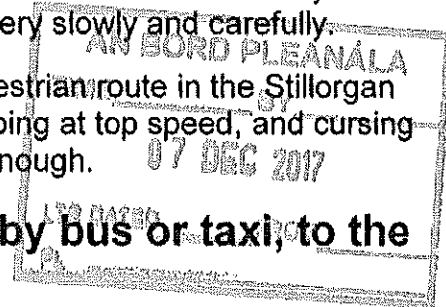
We are being asked to believe that cyclists will behave with courtesy and consideration towards pedestrians, and that the decreased visibility caused by the row of trees along the boundary of this shared pedestrian/cyclist zone will make cyclists slow down and be careful.

The idea that uncertainty slows drivers down has not been proven by proper scientific research. There have been some biased and short-term studies which support the idea, but even if this proves anything about driver behaviour, cyclists do not have the same attitudes, and do not behave in the same ways, as drivers do. It therefore does not make any sense to base an expectation of how cyclists will behave, on studies about how drivers behave.

Cyclists who wish to go through the pedestrian area should simply get off their bikes and walk. Of course many will disobey this rule, but they will know, as they do so, that they will be at fault in any collision, and are much more likely to go more slowly and carefully, than if their route is labelled as being for cyclists as well as pedestrians.

On Henry Street and Grafton Street, cyclists do indeed break the law and cycle through these pedestrianised areas, but they do so very slowly and carefully.

By contrast, on a clearly marked shared cycle & pedestrian route in the Stillorgan area (with pedestrian priority) cyclists can be seen going at top speed, and cursing pedestrians who do not get out of their way quickly enough.



3. The proposed very limited access by bus or taxi, to the College Green area.

Whenever bus stops are moved and bus routes are changed, it is very stressful for people with impaired vision, who have to learn new routes between bus stops, through unfamiliar areas, usually at very short notice, so that there is likely to be a waiting list for training.

Also, people with impaired vision coming from the Christchurch direction will have to walk a much longer distance, to get to Trinity College or other places in the vicinity, since their buses will not proceed to the very popular bus stop at the Central Bank, as they do at present.

Conclusion:

If changes are made to the plans, which will sufficiently address the concerns and objections raised above, then NCBI would be in support of the pedestrianisation of College Green. But as these plans stand, we must and do object to them, on behalf of people with impaired vision.

We have an ageing population. Not all, but very many older people are disabled in some way, with the same person often having several minor disabilities. Disabled people should therefore be regarded as a majority, not a minority, and their needs given priority, in plans for the public realm.

Supporting attached documentation:

(relevant sections only, of the documents listed.)

Appendix A: TrinityHaus Research on Shared Space, Home Zones etc.

Appendix B: The Equal Status Acts, 2000 – 2012

Appendix C: The Disability Act, 2005

Appendix D: Dublin City Council's Disability Act Implementation Plan

Further Information and Contact Details:

NCBI would welcome the opportunity to elaborate on the issues raised in this submission. Please feel free to contact:

Fiona Kelty
Access & Awareness Coordinator
NCBI, Whitworth Road, Drumcondra, Dublin 9
Direct dial: 01 8821950
Email: Fiona.Kelty@ncbi.ie

Web: www.ncbi.ie



Appendix A

Relevant sections extracted and highlighted from:

Shared Space, Shared Surfaces and Home Zones

from a Universal Design Approach for the Urban Environment in Ireland ©2012 TrinityHaus

Executive Summary, Page 10:

Conclusions

The research findings and key recommendations emphasise the current issues associated with shared space design in general and specific concerns expressed by key stakeholders in the Irish context. There is a belief held by many stakeholders that the standard of much urban design in Ireland to date was not of a sufficient quality, and this had some bearing on their opinion about the potential success of shared space design in Ireland.

While this report contains over sixty key research findings and twenty recommendations it is understood that these need to be prioritised and consideration given to shorter term achievements. Many stakeholders, particularly those representing end-users had little awareness of shared space design and those that did tended to represent people with visual difficulties. These groups were therefore more aware of the potential difficulties presented by certain existing features of shared space design.

However, all stakeholders were supportive of the core principles of shared space design which focus on increased pedestrian priority and the overall improvement of the street environment. The other reoccurring themes coming out of the stakeholder engagement process centred on the need for evidence based design guidelines specific to the Irish context, serious concerns about Shared Surfaces and the lack of delineation for certain vulnerable pedestrians and the necessity for in-depth stakeholder engagement in relation to both the preparations of guidelines and ongoing local consultation regarding any proposed shared space design schemes. The stakeholders agreed that the Universal Design approach would be critical in meeting end user needs.

In the short term, if there is still a genuine absence of a reliable alternative to the traditional kerb as a delineator of comfort zones, any shared space design that proceeds should maintain a kerb to act in this capacity. When evidence exists that demonstrates the

successful application of an alternative delineator such as a wide tactile strip or similar, then Shared Surfaces may be considered, in consultation with local stakeholders and end-users.

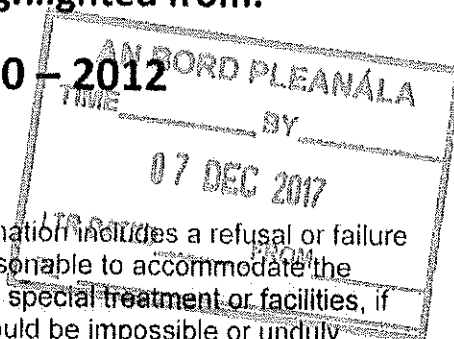
Full report is available online at this address:

<http://universaldesign.ie/Built-Environment/Shared-Space/>

Appendix B

Relevant sections extracted and highlighted from:

The Equal Status Acts, 2000 – 2012



Discrimination on ground of disability.

4.—(1) For the purposes of this Act discrimination includes a refusal or failure by the provider of a service to do all that is reasonable to accommodate the needs of a person with a disability by providing special treatment or facilities, if without such special treatment or facilities it would be impossible or unduly difficult for the person to avail himself or herself of the service.

The Design Team are providing a service to Dublin City Council, by planning an area in the city, for the Council, which will make the area more accessible and pleasant to use, for all pedestrians. The “special treatment”, which was requested by NCBI on behalf of people with impaired vision, in May 2016, was the opportunity to speak to the Design Team before they drew up and submitted their plans. This would have given us an opportunity to explain the particular needs of people with impaired vision, and would have enabled the Design Team to ensure that the plans which they submitted to An Bord Pleanála in 2017 would be acceptable to people with impaired vision.

The “special facility” in question is the provision of a kerb edge, between the area used by cyclists, buses and trams, and the proposed pedestrianised area. Not really a “special” facility, as kerbs are standard throughout all urban areas, but in this case it seems to be regarded by the designers as unacceptable.

The legislation can be viewed in full at this address:

Appendix C

Relevant sections extracted and highlighted from:



The Disability Act, 2005

AN ACT TO ENABLE PROVISION TO BE MADE FOR THE ASSESSMENT OF HEALTH AND EDUCATION NEEDS OCCASIONED TO PERSONS WITH DISABILITIES BY THEIR DISABILITIES, TO ENABLE MINISTERS OF THE GOVERNMENT TO MAKE PROVISION, CONSISTENT WITH THE RESOURCES AVAILABLE TO THEM AND THEIR OBLIGATIONS IN RELATION TO THEIR ALLOCATION, FOR SERVICES TO MEET THOSE NEEDS, TO PROVIDE FOR THE PREPARATION OF PLANS BY THE APPROPRIATE MINISTERS OF THE GOVERNMENT IN RELATION TO THE PROVISION OF CERTAIN OF THOSE, AND CERTAIN OTHER SERVICES, TO PROVIDE FOR APPEALS BY THOSE PERSONS IN RELATION TO THE NON-PROVISION OF THOSE SERVICES, TO MAKE FURTHER AND BETTER PROVISION IN RESPECT OF THE USE BY THOSE PERSONS OF PUBLIC BUILDINGS AND THEIR EMPLOYMENT IN THE PUBLIC SERVICE AND THEREBY TO FACILITATE GENERALLY ACCESS BY SUCH PERSONS TO CERTAIN SUCH SERVICES AND EMPLOYMENT AND TO PROMOTE EQUALITY AND SOCIAL INCLUSION AND TO PROVIDE FOR RELATED MATTERS.

Access to services, etc. 26.—(1) Where a service is provided by a public body, the head of the body shall—

- (a) where practicable and appropriate, ensure that the provision of access to the service by persons with and persons without disabilities is integrated,
- (b) where practicable and appropriate, provide for

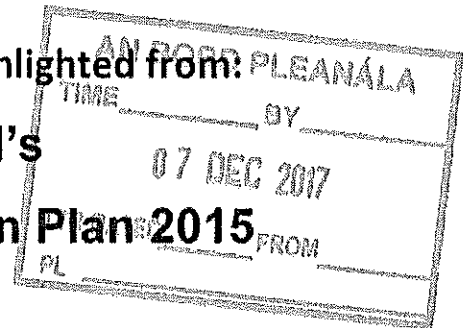
assistance, if requested, to persons with disabilities in accessing the service if the head is satisfied that such provision is necessary in order to ensure compliance with *paragraph (a)*, and

- (c) where appropriate, ensure the availability of persons with appropriate expertise and skills to give advice to the body about the means of ensuring that the service provided by the body is accessible to persons with disabilities.

Appendix D

Relevant sections extracted and highlighted from:

Dublin City Council's Disability Act Implementation Plan 2015



Page 5:

2.0 Background to Framework Implementation Plan.

Under part 3 of the Disability Act 2005 and the Sectoral Plan of the Dept. of Environment, Culture and Local Government all local authorities are required to develop Implementation Plans setting out how they will improve accessibility for all citizens using public parks, buildings, roads, streets, pavements and pedestrian crossings. The National Disability Strategy committed the state to provide a multi-annual financial package for work to be carried out by local authorities to meet the requirements of the Disability Act 2005 and the Sectoral Plan

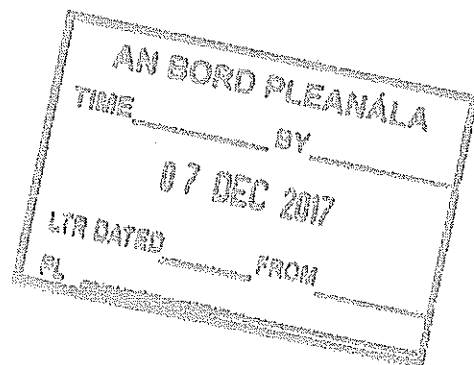
Local Authorities have a responsibility to ensure that the function of our built environment is to enable. A more inclusive approach is to think in terms of the Universal right of access and to seek to improve accessibility and usability for everyone. The principle of universal access ensures that people who have a disability can participate fully in society. The local authority has an immensely important role, both as a building control authority and in its development and maintenance of the external environment.

2.1 The Barcelona Declaration (1995) facilitates local authorities in dealing with disability in a structured and integrated manner. In fulfilling the Declaration's agreements each local authority undertakes to raise disability awareness and to engage in a consultative process with disabled people in implementing plans and actions. In March of 1995 a European Congress "The City and the Disabled" was hosted in Barcelona. The outcome of the Congress was a manifesto known as the Barcelona Declaration signed by delegates representing many cities and towns in Europe. The Declaration advocates the right of disabled people to equal opportunities and recognises their contribution to the society and the environment they live in. In essence, the Declaration promotes the fact that "Every person has a value and the right to be treated with dignity." On a practical level, this translates into the facilitation of structures at local government level that remove disabling barriers preventing people with disabilities from functioning and participating in society.

2.2 The Dublin Declaration for Age Friendly Cities In 2011 the Lord Mayor of Dublin hosted and signed the Dublin Declaration for Age Friendly Cities. The Dublin Declaration signing was held in association with the 1st International Conference on Age-Friendly Cities which was also held in Dublin, September 2011. The conference was co-hosted by the Ageing Well Network Ireland and the International Federation on Ageing. The Dublin Declaration commits cities and counties to be more age friendly.

The full document may be viewed at this address:

<http://www.dublincity.ie/sites/default/files/content/YourCouncil/AbouttheCouncil/CouncilDepartments/Documents/FINAL%202015%20Implementation%20Plan3.pdf>



Sent: Mon 16/05/2016 11:33

From: traffic@dublincity.ie
To: Fiona Kelty <Fiona.Kelty@ncbi.ie>
Subject: RE: College Green.

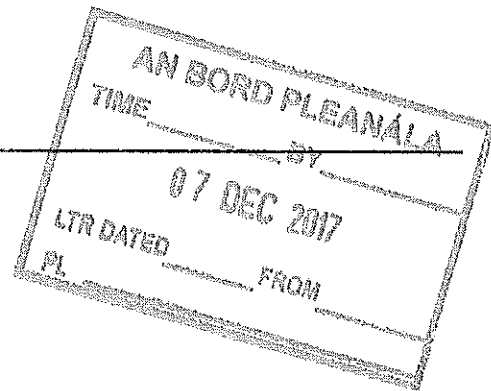
Dear Ms. Kelty

I wish to acknowledge your email regarding your submission.

Kind Regards

Karen O'Flaherty

From: Fiona Kelty [Fiona.Kelty@ncbi.ie]
Sent: 16 May 2016 11:03
To: traffic@dublincity.ie
Subject: College Green.



Dear Sir/Madam,

Please find attached NCBI's submission regarding the proposed changes to the College Green area.

Regards,

Fiona Kelty
Access & Awareness Coordinator
NCBI – Working for People with Sight Loss.

Follow us on Facebook: <https://www.facebook.com/ncbisightloss>
Follow us on Twitter: http://www.twitter.com/ncbi_sightloss

Check-out NCBI's Mícheál Ó Muircheartaigh appeal on the following link. <http://youtu.be/25P2tiuCI0U>

NCBI Group - CRO No 26293 CHY 20902
NCBI Services - CRO No 527862 CHY 4626
NCBI Retail - CRO No 527863 CHY 20619
NCBI Charitable Foundation - CRO No 527864 CHY 12673

Information in this email (including attachments) is confidential. It is intended for receipt and consideration only by the intended recipient. If you are not an addressee or intended recipient, any use, dissemination, distribution, disclosure, publication or copying of information contained in this email is strictly prohibited. Opinions expressed in this email may be personal to the author and are not necessarily the opinions of NCBI.

If this email has been received by you in error we would be grateful if you could immediately notify the IT Service Desk by telephone at +353 1 8821911 or by email to service.desk@ncbi.ie and thereafter delete this e-mail from your system.

NCBI Submission

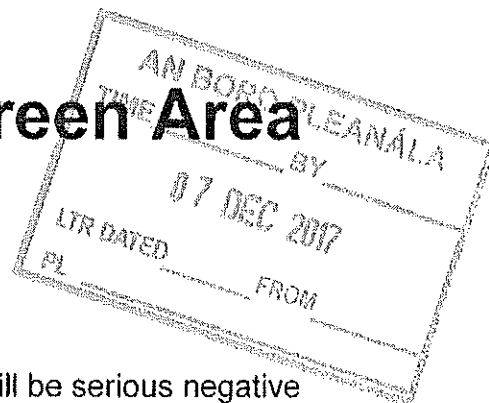
To:

Dublin Bus and Dublin City Council

Re:

Plans for the College Green Area

16 May 2016.



NCBI is concerned that, if the current plans go ahead, there will be serious negative impacts on people with impaired vision.

The majority of people on the Blind Register are elderly, and have other disabilities besides sight loss. When buses are no longer able to stop in the College Green area, people may find it difficult or impossible to walk the increased distances between the nearest bus stops and their destinations.

People with impaired vision, who have been using the same bus stops for years, may well find it confusing and disorientating to have to change bus stop, and learn a new route through a greatly changed environment.

Depending on details of the design, it may also be unsafe for people with sight loss to use this area independently – for instance, if they are expected to share space with trams and cyclists.

NCBI would welcome an opportunity to discuss details of the plans with a member of the design/planning team, to ensure that this part of the city will be **more** rather than less accessible for all pedestrians, in future.

Please contact:

Fiona Kelty,
Access & Awareness Coordinator,
NCBI – Working for People with Sight Loss,
45 Whitworth Road,
Drumcondra,
Dublin 9.

Direct dial: 01 8821950. **Email:** Fiona.Kelty@ncbi.ie.

