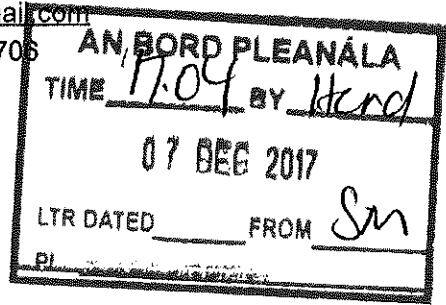


An Bord Pleanála Reference Number: 29S.JA0039

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December 2016 Observation on further information on College Green Project -
Environmental Impact Statement and Planning Submission

Dear Sir / Madam,

This observation is for the 'College Green Project - Environmental Impact Statement and
Planning Submission', following the display of further information as ordered by An Bord
Pleanála Reference, and further to my original submission on this project.

As the fee was paid with the original submission, and as per the advertisement stating it is
not due again, such is not enclosed. I trust that this is correct.

Policy background

Dublin City Council the City Development Plan 2016-2022:

*SC3: To develop a sustainable network of safe, clean, attractive pedestrian routes,
lanes and cycleways in order to make the city more coherent and navigable.*

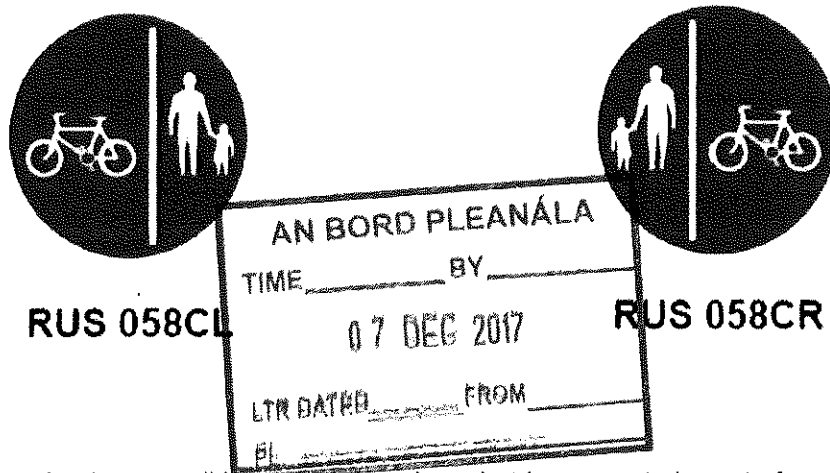
It states that the "The Proposed Project is comprehensively supported by relevant policies,"
but this is not the case, the cycle lanes proposed for Dame Street mixed with taxis and
buses exposing people cycling to unnecessary risk -- making them far from as safe as they
could be and far less attractive than they could be.

3.8.2.2 Pedestrian Priority Area and Cyclists

The council states:

The 3.5m wide cycle route across the plaza will be separated from the adjoining footpath to the south by a delineation paving strip. On the northern side the cycle route will be separated from the pedestrian zone of the plaza by a row of trees and various items of street furniture. The start of the cycle route will be indicated by signs RUS 058CL for the eastbound direction and sign RUS 058CR for the westbound direction as shown following.

In only having a delineation paving strip on one side



It is unclear why the council is using these signs, but it seems to be out of some kind of misguided understanding of these signs give a higher degree of pedestrian priority than a cycle track or cycleway sign.

Where the cycle route going from east to west, to the left and to the right of the cycle path will be pedestrian area (the old footpath on one side and the plaza on the other) -- these signs ignore the fact that plaza is also a pedestrian area and might give both the impression and legal backing for cyclists to cycle on the main plaza area.

The council also states:

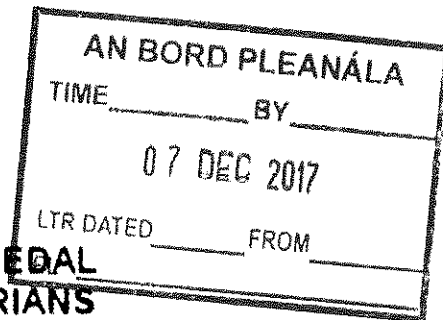
The two crossing points for the main north-south pedestrian route at the southeast corner of the plaza at Lower Grafton Street, and also near the corner of Church Lane, will be governed under Sign RUS 058 of the Traffic Regulations that will denote the space for pedestrian priority as indicated in the extract below from Chapter 5:

And includes the extract:

5 18.3 The sign for Pedal Cycles and Pedestrians, RUS 058, prohibits all vehicles except pedal cycles from using the identified track. The sign indicates that pedestrians, wheel chair users and cyclists share the track, and there is no physical or visual segregation between them. It should only be used in exceptional circumstances, where it is impracticable to provide segregated facilities and cyclists shall yield to pedestrians.



**RUS 058:
SHARED TRACK FOR PEDAL
CYCLES AND PEDESTRIANS**



Note how the Traffic Signs Manual states that this sign is for a shared track -- this is for cycle tracks with shared. While councils often use the sign for shared areas where footpaths and cycle track users mix before crossing a roadway, this sign is hardly appropriated or clear for a crossing of cycle route in a pedestrian area.

The council's contention that the shared track sign amounts to a "pedestrian priority" is unlikely to hold up in law. The Traffic Signs Manual states that "and cyclists should yield to pedestrians" -- however, the Traffic Signs Manual has limited legal strength and has to be read in the context of the wider Road Traffic Acts. Cyclists should of course be expected to yield to pedestrians but, where and when appropriate, pedestrians should also be expected to yield to cyclists as per the normal Road Traffic Acts and the Rules of the Road.

Alternatives, such as a wide and long zebra crossing, or pedestrian crossing signs, or yield signs directed to the cycle paths with information plates stating "to pedestrians" would make it clearer and more legally sound that there is a priority pedestrian crossing point.

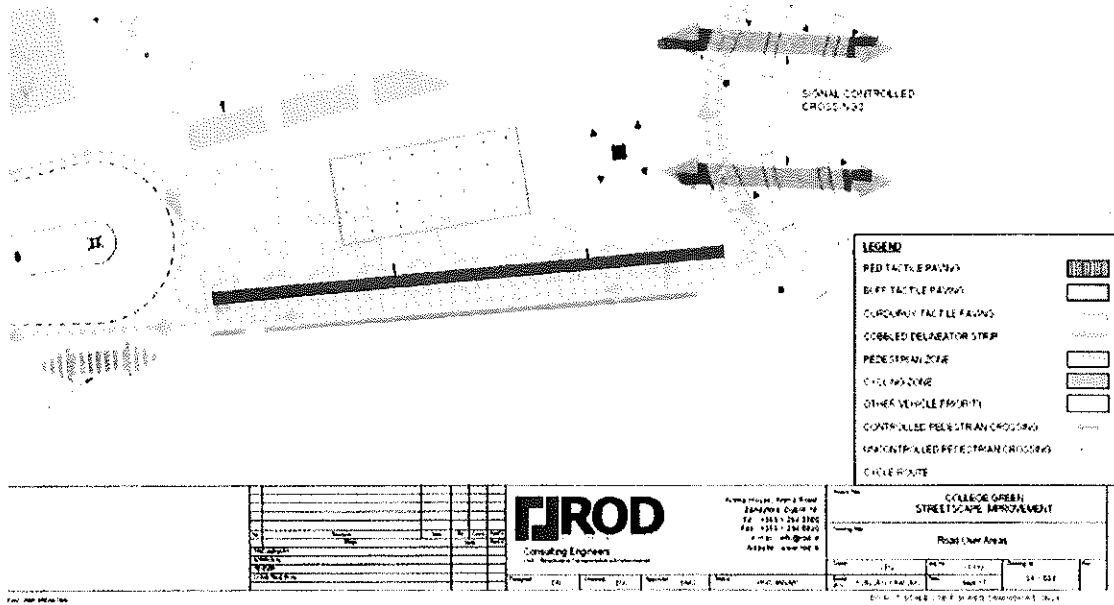
3.8.2.3 =Visually Impaired Pedestrians

The council states:

The plaza design follows best international practice for the management of the needs of the various street users in a hierarchical order that places pedestrians first, especially the visually and mobility impaired who will have full freedom of movement

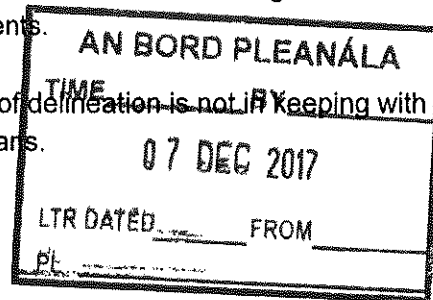
on two routes at the eastern and western edges of the plaza without need to worry about conflicts with cyclists and traffic at these crossing points.

The full version of the following map was included -- I have edited to include a red line where the council for some reason does not have any delineation:



It is unclear why the delineator strip or a tactical strip is missing from this line -- the only conclusion is that the council wants to keep the visual effect of the plaza across this section of the cycle route but this will only lead to confusion with those with full sight and will be both unfair and dangerous to those with visual impairments.

Like with the cycling provisions generally, the lack of delineation is not keeping with best international practice for visually impaired pedestrians.



3.8.2.4 Priority at Crossing Points

The council states:

It is a matter of numbers that should determine the allocation of priority where pedestrians and cyclists interact within the College Green Plaza. The May 2017 EIS notes that there are currently 75,000 pedestrian movements and 6,500 cyclist movements per day across College Green. Thus with a ratio of over 10 to 1 it is most appropriate to allocate priority to pedestrians, and to require cyclists to filter through the space slowly. This is also a safe arrangement by default.

This submission agrees that allocation of priority should be to pedestrians, but that for the reasons outlined in the rest of this submission, the council are not designing correctly for pedestrian priority.

3.8.2.5 Convenience for Cyclists

The council states:

It is acknowledged that the proposed cycle route across College Green is indirect, especially in the west to east direction. There are also some sharp turns that will require cyclists to travel very slowly. This is deliberate for safety reasons, so that the various interactions between cyclists and pedestrians will occur at slow speed, with cyclists required to give priority to pedestrians as they filter through the plaza.

It is a good aim to require cyclists to go slow in this area as the turn is too sharp and combined too closely with the crossing (surfaced by stone slabs) and with corduroy tactile paving which is a slip hazard when cyclists are even going straight on.

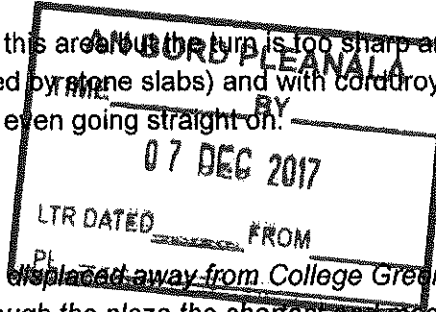
The council states:

Unlike other modes of traffic that will be displaced away from College Green, cyclists will benefit from being able to cross through the plaza the shortest and most direct route through this part of the city centre. This will provide considerable convenience as well as a greatly enhanced quality of service on streets that will have much reduced traffic volumes for better safety and comfort of cyclists. The pedestrian priority zone of the College Green Plaza is only 60m long from west to east. Even though cyclists will be required to travel slowly at about 10 km/h or less through this space, it will take only half a minute of journey time to get through from one side to the other.

The council states that this is a "pedestrian priority zone" when the Traffic Signs Manual states that the main signs to be used (RUS 058CL and RUS 058CR) are cycle track signs, with pedestrians in a space beside them (again: the signs are incorrectly used as they only allow for pedestrian space to one side, when the pedestrian space will be to both sides of the cycle route).

The council states:

A formally designated cycle track with signal-controlled crossings would be less favourable as it would actually increase delay and reduce convenience for both cyclists and pedestrians, as well as being inherently less safe if a pedestrian were to stray onto the cycle track unexpectedly where cyclists would be travelling at higher speed.



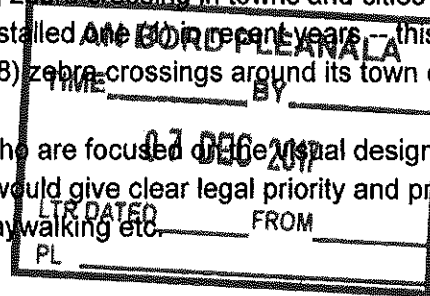
By using RUS 058CL and RUS 058CR the council is putting in a designated cycle track. The council seem to be trying to square a circle in the following regard:

- they are stating that they they don't want a designated cycle track but they want to keep the cyclists a 3.5m area,
- they are claiming that they are doing best practice for the visually impaired but won't make it clear where the plaza stops and where the 3.5m area of the cycle route starts.

Regarding a signal-controlled crossing, I am unaware of any cycling groups looking for signal-controlled crossing. It is possible other groups or individuals are looking for such -- this submission agrees with that council that a normal signalised pedestrian crossing would not work.

However, if An Bord Pleanála wants to mandate the use of a signal-controlled crossing, a zebra crossing might have a better change of working and removes the delay factor. While councils across Ireland have started using/reusing zebra crossing in towns and cities in the last 10 years or so, Dublin City Council has just installed one in recent years, this is compared to Ballina in Co Mayo which has eight (8) zebra crossings around its town centre.

A zebra crossing might be disliked by architects who are focused on the visual design and roads engineers who are not used to them, but it would give clear legal priority and practical clarity to daily users, would not result in delay or jaywalking etc.



3.8.2.6 Delineation of the Cycle Route

Figure 8.3 (Nantes), figure 8.5 (Stockholm), figure 8.6 (Linz, Austria) and figure 8.7 (Copenhagen) would all be an improvement on what the city council proposes -- which is to have the cycle route using the same pattern as the main plaza.

The proposed design is somewhat like Figure 8.4 of Exhibition Road, London -- a street which is noted by London based cycling campaigners as poor for cycling, noted as being poor for visually-impaired people and has a record of collisions -- including a recent collision which was mistaken for a terrorist attack. The Guardian headline reported "Crash at London's Natural History Museum not terror-related, say police" with the sub-headline: "Incident, in which car mounted pavement and left 11 injured, being treated as traffic accident."

3.8.2.7 Potential Conflict Points

The council states:

Buses, and other occasional vehicles permitted for access purposes, will travel around the inner part of the roundabout. Since almost all of these vehicles will be making a u-turn, there will be minimal crossing of the cycle route.

Is this a roundabout or a turning circle? If it is a roundabout it should comply with the Traffic Signs Manual on signs and National Cycle Manual designs on roundabouts.

If it is a turning circle for buses, there is little or no reason why cyclists are not being protected from buses by physical segregation.

3.8.2.8 Provisions for Cyclists on Dame Street

The council states:

The speed limit on Dame Street is 30 km/h as part of the City Centre zone, which provides a suitable and safe environment for cyclists on the street. In accordance with the National Cycle Manual (National Transport Authority, 2011) (Section 1.7.4 Guidance Graph, shown on Figure 8.9) on a street with a 30 km/h speed limit it is appropriate for shared use of the street without cycling facilities in the context of traffic flows of up to 10,000 AADT vehicles per day. Traffic flows on Dame Street are already far below this level, and will reduce further once the College Green Plaza is in place and most bus services and taxis are re-routed. Thus cycle lanes are not necessary in accordance with the relevant design standard.

Nevertheless, the Proposed Project includes provision of cycle lanes on Dame Street for guidance of cyclists to indicate that Primary Cycle Route 7 follows this street from the western part of the city through College Green, merging with Route 11 from Trinity Street / Church Lane, towards O'Connell Bridge.

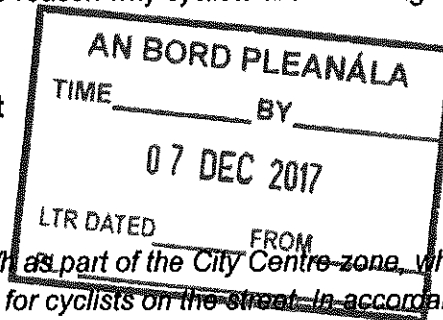
This is a use of the National Cycle Manual to try to justify cycle route designs below that in policy.

The Dublin City Development Plan 2016-2022 (referred to hereafter as the Development Plan) states:

"With regard to the city centre, in particular, ease of access to persons of all ages and abilities is a significant indicator as to how inclusive Dublin is as a city."

The Council's 'Your City – Your Space, Dublin City's Public Realm Strategy' (2012), states:

"Dublin City Council's vision is for a public realm that... Is easy people of all ages or abilities to use. 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."

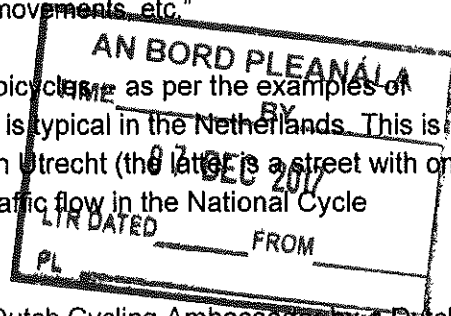


However, despite the above and the Development Plan looking for "facilities that are relevant and accessible to people of all ages and abilities", the Council is planning non-segregated and non-continuous cycle lanes on Dame Street of a type where loading and unloading of goods vehicles is allowed under law, and a cycle route exposed to buses doing U-turns at the western edge of the proposed plaza -- these are hardly design elements suitable for all ages and abilities.

The Development Plan policy and other policy documents needs to be respected above and beyond guidance in the National Cycle Manual.

The National Cycle Manual does not state anything close to never use segregation once there's a 30km/h zone. It states: "Along a cycle route, there may be different options chosen for different links. Junctions are primarily designed as integrated facilities unless there are special circumstances, e.g. specific left hand turn issues, HGV movements etc."

Best international practice is to segregate buses and bicycles as per the examples of Utrecht, a Dutch city which relies on buses more than is typical in the Netherlands. This is what happens on Sint Jacobsstraat and Vredenburg in Utrecht (the latter is a street with only about 3,000 buses per day -- well below the 10,000 traffic flow in the National Cycle Manual).



The author of BicycleDutch, who is was appointed a Dutch Cycling Ambassador by a Dutch governmental / industry body, writes the following on an article about Vredenburg:

Cycleways in a 30km/h zone are not common; with such low speeds mixed traffic is the rule. But in this particular street there are so many buses that the protected cycle tracks were seen as necessary. All side streets got raised entrances that are interrupted by the cycleways to make sure that it is clear that cycling has priority over turning motor vehicles. (Source: <https://bicycledutch.wordpress.com/2015/08/25/the-redesign-of-the-utrecht-sint-jacob-sstraat/>)

The city council should be following best practice and policy, not using guidance manuals as excuses not to use the best design for users in terms of safety and attractiveness.

3.2.4 Response to FI Request No. 2 - Impact on Cyclists

The following issue was not directly in the response under the above header but should be followed to allow for compliance the the Development Plan (which looks for cycling contra-flow on roads / streets with one-way motor traffic) and the GDA Cycle Network.

Church Lane

Contra-flow on Church Lane -- by way of a cycle track or just entry treatment an mixing on the street -- would give access to Suffolk Street / Grafton Street (as locations -- not all cyclists can walk far) and access to the existing contra-flow lane on Andrew Street towards

South William Street, and to Nassau St while minimizing the distance of Luas tracks people need to cycle along while sharing with trams and buses.

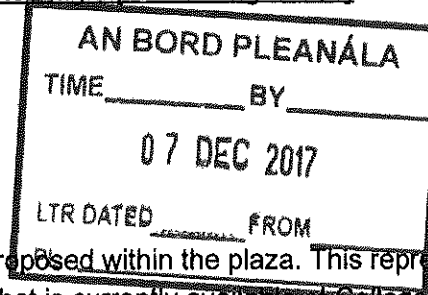
MTO13 of the Development Plan states:

In accordance with cycle routes identified in the National Transport Authority's Greater Dublin Area Cycle Network Plan It is an Objective of Dublin City Council: (i) To improve permeability for cyclists by reducing speed limits to 30kph and allowing contraflow cycling on all single lane one way streets, and to provide a segregated contraflow cycle lane on all one way streets with two or more lanes, except where engineering report demonstrates risk is too high. [underlining added]

Other issues: Cycle parking

The city council states:

"Some 32 bicycle parking spaces are proposed within the plaza. This represents an increase of 6 spaces over and above what is currently available at College Green. In considering a) the potential for additional cycle parking in close proximity to College Green and b) the objective of the design team to avoid visual clutter in an area of Historic importance, c) College Green's role as a venue for hosting mass events such as the New Year's Eve Festival requires that the provision of stands be minimised, it was considered that the provision of 32 bicycle parking spaces in College Green is sufficient to meet the needs of the Proposed Project."



The idea that "32 bicycle parking spaces in College Green is sufficient to meet the needs of the Proposed Project", just 6 more than current, will meet demand is a very strange claim -- the council must think that the plaza and its planned cycle routes (such as the nearby Liffey Cycle Route) will not attract people or that cyclists will not want to stop near the plaza.

The alternative to not providing extra parking is for bicycles in the suggested areas (out of the flow of people and traffic) is for them to be parked in less suited locations to traffic polls, trees etc.

The council further states that there are future plans for high density cycle parking locations and outlines the parking planned to be provided in different areas. The Dublin City Centre Cycle Parking Strategy Report states that on-street parking will be needed regardless of density cycle parking parking units and these units are not funded and most far away from College Green. This is like a housing or office developer telling a planning authority that there will be parking provided somewhere else, maybe a half an hour walk away or more.

The issue of clutter does not make sense as the stand locations previously suggested to double the number of stands were mostly within tree lines and in locations such as between the cycle track and the area buses will use (ie areas with pedestrian crossing near by and not an area where pedestrians should generally be accessing).

Any issue with extra stands for the hosting of mass events such as the New Year's Eve Festival would exist with current stands -- the solution to both would be removal stands.

An alternative is to locate the parking away from the plaza -- the city is looking at taxis, loading etc but is not addressing the urgent need for extra bicycle parking.

Conditions

I would strongly urge that An Bord Pleanála add the following conditions to the permission for the project:

1. That there be a delineation paving strip on both sides of the cycle route throughout the plaza. REASON: for pedestrian and cyclist safety and for the independence and safe movement of pedestrian with visual impairments.
2. That there be clear difference in colours and patterns between the cycle route surface and the pedestrian spaces. REASON: for pedestrian and cyclist safety and for the independence and safe movement of pedestrian with visual impairments.
3. That there be clear difference in colours and patterns between the areas which the cycle route and pedestrian flows cross each other and all other surfaces. REASON: for pedestrian and cyclist safety and to highlight the conflict point.
4. (A) The council must upgrade the cycle lanes on Dame Street to be segregated from buses, trucks and taxis using the street. REASON: For cyclist safety and attractiveness. OR (B) The council must upgrade the cycle lanes on Dame Street to at least use solid white lines rather than the dashed lines in the current plans. REASON: For cyclist safety and compliance with the National Cycle Manual.
5. That there be at least a doubling of the number of bicycle parking stands provided as part of the project. REASON: meeting demand, pedestrian safety, convenience, not impacting on traffic flows.
6. Provision for contra-flow cycling on Church Lane. REASON: Compliance with the Development Plan and the GDA Cycle Network.

Regards,

Cian Ginty

