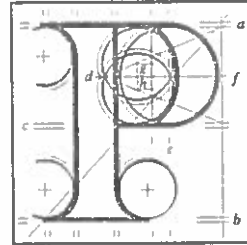


Our Ref: 29S.JA0039
P.A.Reg.Ref:

Your Ref:



An
Bord
Pleanála

Padraig Mallon
Irish Guide Dogs for The Blind
National Headquarters
Model Farm Road
Cork

22nd February 2018

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

Dear Sir,

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,

Kieran Somers
Executive Officer
Direct Line: 01-8737107

EI02



**Irish
Guide
Dogs**
for the blind

The Secretary
An Bord Pleanála
64 Malborough Street
Dublin

20 February 2018

Dear Sir/ Madam,

I enclose Irish Guide Dogs for the Blind submission on the proposed plans for College Green.

Our submission outlines our concerns and makes a number of recommendations in relation to these plans that we believe will ensure the College Green Plaza Plan will be safe and usable space for our clients who are blind and vision impaired and families with children with autism.

Best Regards,

Padraig Mallon

CEO

| | |
|-------------------------|----------|
| AN BORD PLEANÁLA | |
| Received: | 21/02/18 |
| Fee: | €50.00 |
| Receipt No: | B141174 |

| | |
|-------------------------|-----------|
| AN BORD PLEANÁLA | |
| TIME | 9.00 |
| BY | Reg |
| 21 FEB 2018 | |
| LTR DATED | FROM 11.0 |
| PL | |

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Model Farm Road, Cork, T12 WT4A

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Tel: 021 487 8200

Lo-Call: 1850 506 300

Email: info@guidedogs.ie

Established 1976

Co-founders: The Late Ms Mary Dunlop
Mr Jim Dennehy

Directors:

P. Burke (Chair), E. Murphy (Vice Chair), T. Aplin,
N. Palmer, D. Walsh, B. Clear, D. Lang, J. Browne,
C. Simpson, P. Cogan, T. Doyle, M. Gordon.

Registered in Ireland No: 55616 Charity No: CHY 6006
Charities Regulatory Authority Registered No: 20009977
Registered Office: Model Farm Road, Cork

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**Irish
Guide
Dogs**
for the blind

**Making Sense of Shared Space and Contemporary
Urban Street Design**

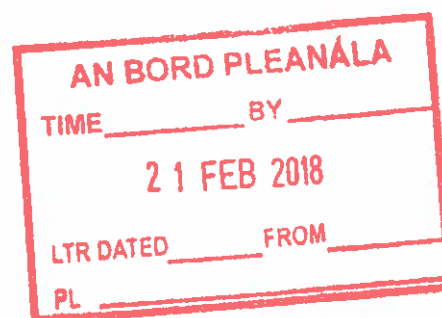
Submission to An Bord Pleanála specific to College Green Plaza
Design



Executive Summary:

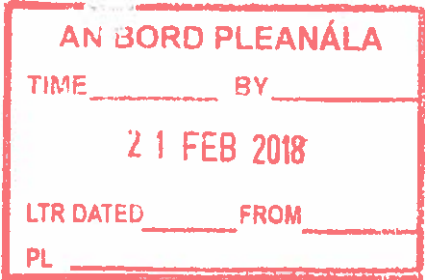
This submission to An Bord Pleanála on the planned redevelopment of College Green Plaza, Dublin City Centre is made by Irish Guide Dogs for the Blind on behalf of our Clients. This submission outlines the concerns Irish Guide Dogs for the Blind has for the safety of people who are blind or vision impaired within the plans submitted by Dublin City Council.

Our aim is to ensure that people who are blind or vision impaired or those who work with an Assistance Dog can use the College Green Plaza area safely.



Who we are:

Irish Guide Dogs for the Blind is the leading national charity who provides vital services to people who are blind or vision impaired and families of children with autism. Founded in 1976, we provide a range of mobility and independent living Skills training programmes, including mobility with a Guide Dog, Long cane or an Assistance Dog.



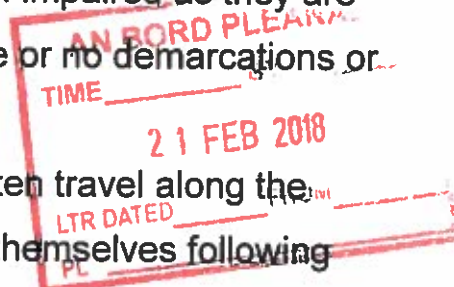
Recommendations on the College Green Plaza Plan:

1. **Non-Traditional Footways without Kerb Barrier:** Irish Guide dogs for the Blind is concerned about the proposed footway with no kerb barrier. Kerbs are traditionally used to delineate where the pathway meets the roadway. Research conveys there is no reason to remove the kerb at footways (1). In the proposed plans for College Green Plaza large sections of the footway, an example is the area immediately adjacent to Trinity College Gates, are delineated by tactile paving rather than the traditional standard height kerb.

Our recommendation is to incorporate the traditional kerb which is dished at pedestrian crossings to facilitate people who use wheelchairs and delineated with blistered paving to support people who are blind or vision impaired at all areas that intersect with non-pedestrian traffic (3).

2. **The plans also convey a non-traditional footway in that it is widened as another traffic calming measure.** Enlarging the pedestrian pavement ensures the roadway is narrowed as a traffic calming measure. However, excessively widened pathways can disorientate people who are blind or vision impaired as they are travelling through an open space with little or no demarcations or landmarks.

People who travel with a long cane will often travel along the building line as it is the route to orientate themselves following shop doors and other landmarks. Nonetheless, when the pedestrian pavement is widened far beyond traditional widths the pedestrian pathway becomes unduly difficult or impossible, for



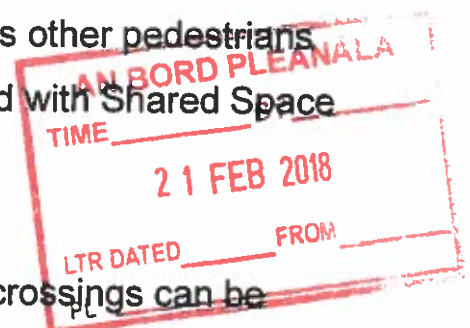
people who use a guide dog or a long cane to orientate themselves as it is increasingly difficult to find controlled pedestrian crossings and other relevant landmarks such as shop entrances.

We would recommend the use of tactile markings at appropriate settings within the open plan areas to provide a clear indicator for those who are blind or vision impaired to follow safely to crossings.

- 3. Extended Pedestrian Crossing Times:** The plans convey the pedestrian crossing at Trinity Gates will have dual way Luas tram lanes and cycle lanes and bus lanes. Other crossings in the plan have dual Luas tram and Cycle lanes. Irish Guide Dogs for the Blind is highly concerned pedestrians will not have sufficient time to cross the roadway safely. It is essential the audible bleep is activated for a suitable time period to allow pedestrians, in particular blind and vision impaired pedestrians, sufficient time to cross the roadway safely and comfortably.

It is also our understanding that pedestrians are expected to walk to Dame Street to access the one and only control pedestrian crossing. This puts pedestrians who are blind or vision impaired under undue stress and at a disadvantage as other pedestrians are availing of the courtesy crossings aligned with Shared Space principals.(1)(4)

- 4. Courtesy Crossings:** Courtesy pedestrian crossings can be problematic for people who are blind or vision impaired as they are unable to negotiate their right of way with other road users such as cyclists, in particular in streets with a high volume of traffic.



Raising the pedestrian crossing path so that it is flush with the pedestrian pathway of standard kerb width, and marking the dome edges on both sides of the crossing path can assist in encouraging motorists in slowing down on their approach to the crossing and stopping at the ramped edge to allow pedestrians to cross can be helpful.

Irish Guide Dogs for the Blind is asking that consideration is given to other options at these courtesy crossings to allow pedestrians the right of way to cross at these crossing points, bearing in mind the high volume of pedestrians vying with cyclists and extended Luas trams. It is of utmost importance that extra control tactile ground surface pedestrian crossings are implemented in the plans for College Green Plaza on all crossings.(2)(5)(6)

5. Uncontrolled Crossings over Luas Tram Lines: The implementation of uncontrolled pedestrian crossings across Luas tram lines across Dublin city is of great concern.

This is untenable for pedestrians who are blind or vision impaired as they have no control signal button to push to notify them when it is safe to cross the junction.

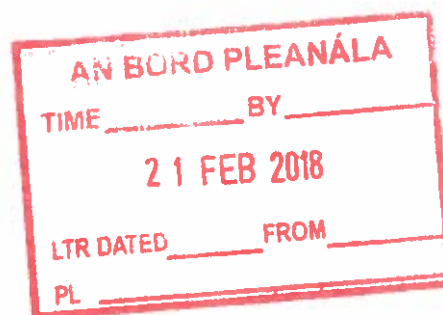
This becomes relevant to the College Green Plans, as they are currently, when pedestrians who are blind or vision impaired will be expected to walk up to Dames Street to access a tactile ground surface control crossing.

Irish Guide Dogs for the Blind recommend that controlled crossings to be utilised at all intersections within the design of College Green Plaza.

6. **Audible bleep signal:** Audible bleep signal at control pedestrian crossings must be audible at all times and a suitable volume to be heard over traffic in order for people who are blind or vision impaired to be able to locate the signal control push button. This will have particular impact at the crossing from Trinity Gates because of the size and length of the crossing coupled with the volume and variety of traffic utilising it.

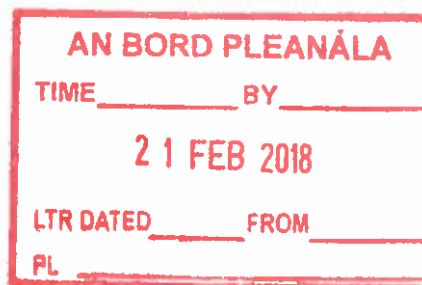
Irish Guide Dogs for the Blind believe it is important that the audible signal at control crossings in the newly developed College Green are bleeping at all times.

7. **Tactile Ground Surface Indicators:** Irish Guide Dogs for the Blind is requesting that the plans incorporate appropriate barriers for pedestrians along the cycle lanes. Research conveys it is impossible to select a type of tactile paving that meets the needs of all road users.(2)(3)(6) The most adequate barrier is the standard kerb.



Conclusion:

We are asking that our recommendations be considered as an opportunity to make improvements to the Plans as outlined. We believe these recommendations will support our Clients who are blind or vision impaired and families of children with autism who work with an Assistance Dog to fully enjoy the new College Green Plaza.



References:

1. Full Report on Shared Space, Shared Surfaces and Home Zones
Trinity College Dublin, commissioned by the Centre for Excellence
in Universal Design, and the National Disability Authority 2011
2. Guidance on Tactile Paving, UK Guidance Document
3. Research Study on Tactile Paving conducted by University Randell
and commissioned by Guide Dogs for the Blind Association, UK.
4. Focus group on Shared Space research by Guide Dogs for the
Blind Association, UK
5. Equality Tribunal decision
6. National Disability Authority Study Report, 2011
7. University of Randell, UK, Research Study on Tactile Paving
8. Department of transport, UK, guidelines on tactile paving

