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c/o Neasa Hourigan TD  
Leinster House,  
Kildare Street  
Dublin 2

Dublin City Council,  
Civic Offices, Wood Quay  
Dublin D08 RF3F

Delivered by email to [citycentreprojects@dublincity.ie](mailto:citycentreprojects@dublincity.ie)

1st December 2023

Dear Sir/Madam,

We wish to comment on the Draft Dublin City Centre Transport Plan. We have included our observations below.

Kind Regards,

Is mise le meas,



Neasa Hourigan TD, Dublin Central



Cllr. Janet Horner, North Inner City



Feljin Jose, Area Rep., Cabra-Glasnevin

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## 1. Overview

We support the core aim of this plan to make Dublin's city centre low traffic with more of a focus on sustainable transport modes and with more efficient public transport.

Diverting traffic (especially through traffic) away from the city centre will improve the city centre for people who live in, work in and visit the city centre. The public realm improvements will be a welcome upgrade to the areas involved.

## 2. Accessibility

### Accessible Rights-Based Public Realm Design

Disabled people face greater barriers to travel than non-disabled people, taking 30% fewer walking trips. A key reason for this gap is that our streets are often inaccessible and unsafe for those with mobility impairments to navigate. One key way to ensure the Dublin Transport Plan delivers a city that is truly accessible for persons with disabilities is to fully enforce the prohibition on pavement parking which is rife across the city. Implementing red light camera fines would make street crossings safer for all and ensuring footpaths are consistently audited and maintained to the highest standards of accessibility should be a foundational principle.

For those with mobility impairment or additional challenges it is important that any city wide transport strategy makes a priority of legibility in the streetscape. All projects must make the public realm comprehensible at a human scale, using routeways, access points, focal points and landmarks as appropriate to help people find their way. While a focus must be put on clarity in information and signage it is also important that a clear principle is put in place to keep

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streets clear of clutter and to optimise the ease of movement, including stopping and resting in comfort and safety.

High quality design of green space, the inclusion of trees and planting wherever possible and thoughtfully designed street furniture that caters to all needs will help create a public realm that is easy to comprehend, welcoming and supports the life of the city.

While it may not be obvious the provision of adequate lighting in the public realm is hugely important to persons with disabilities (and as part of a feminist city as mentioned later in the document). We would ask that the development of projects outlined in the Dublin Transport Plan seek to provide innovative lighting strategies to the Dublin City area that are also respectful of the historic fabric and traditional lamps that still exist in some parts of the city. Providing the appropriate atmospheres from light and increased visibility in public spaces facilitates more crowds and regular use of the space. It also encourages engaged users who are more willing to care for the space and the people around it, fostering a naturally safer community.

Part of a rights-based approach to design is a recognition that children are growing up and attending school in the urban environment and that the public realm should also cater to their needs.

We would also like to draw your attention to the issue of air pollution as a rights based concern. Ireland has one of the highest levels of asthma in the world among both adults and children. The Dublin Transport Plan is a very important step in solidifying the goal of reducing car traffic into the city. This will also uphold the rights of those with health conditions impacted by air pollution and we would ask that this ambition is protected and optimised throughout the development of the plan.

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## Accessible. Rights-Based Public Realm Maintenance and Management

Ongoing maintenance of the public realm and infrastructure is a key component of creating a city that is accessible and safe for everyone. Too often public transport is unavailable to some when lifts break or whole streets become inaccessible as footpaths are cordoned off during the construction of inner city sites.

Maintaining an accessible space must be a priority for city managers not an afterthought and we would ask that, particularly during construction and development of new transport links and buildings, the needs of persons with disabilities in navigating the city be both respected and protected.

### Accessible Public Transport

#### Ease of Access

As the public transport system in Dublin developed in tandem with the public realm the Dublin Transport plan must focus on delivering multi-modal travel to those with mobility impairments that is obstruction free. Step free travel has been recognised in the design of both the LUAS and the current bus network but an all-city approach to this universal design principle would strengthen the document.

Access points, footpaths and corridors to and from public transport are the moment when transport networks meet the city and as such should be of particular concern in designing for persons with disabilities, for families with young children and for older people.

#### Alternative Accommodations

Where public transport is inaccessible to persons with disabilities due to lifts breaking down or stairs/escalators being out of use the operator should provide

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an alternative mode of transport free of charge to that patron to complete their journey.

### A Place to Rest

Any public transport operator should provide a seating area for those with disabilities to rest in close proximity to the mode of transport.

### Changing Places

We would ask that the Dublin Transport Plan explicitly commit to the provision of Changing Places WC services across the city and as part of the bus and rail network. This would be a core foundation of accessibility and inclusivity.

### Travel Mentoring on Public Transport Systems

A truly accessible city should support all people to use it though some users may need additional support to do so. We would ask that a scheme of free travel advice be put in place to assist people using public transport in and around Dublin to become more confident and independent travellers. This scheme should be focused on those who feel they have mobility challenges that could be supported through advice and additional information.

Options for this scheme could include; advice by telephone and email to help plan an accessible route; Provide an advisor to accompany people on the first few practice journeys to help learn how to travel the network independently; virtual assistance, using apps available on most smartphones.

### Accessible Information

All maps, live information and proposed planning documents should be fully accessible through e-readers and apps for persons with disability. We also suggest that specific communities such as the deaf community, those with visual impairments and those with autism be consulted on how to develop accessible information material to the general public.

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## **Diversity and Gender in the Public Realm**

A recent OECD study found that half of those who identify as female do not feel safe walking alone at night. As mentioned previously, lighting in darkness has a significant role to play in this issue. Traditional lighting standards focus predominantly on numbers – the evenness (uniformity) and intensity (lux) of light landing on the ground. We would ask that the Dublin Transport Plan include principles on the provision of gender and diversity proofed lighting that would deliver urban environments that do not create pools of darkness, are not overlit to create light pollution and that recognises the use of streets for the night time economy in the city as distinct from the day usage of the public realm.

A focus on design and development with women's safety and the safety of all who frequent Dublin must be at the heart of decision making and should be prioritised alongside other areas of inclusivity, and sustainability, as a key aspect of building back better. In order to achieve this it is important that the team of designers of each project is diverse and representative, and that those views are heard from the beginning not just during stakeholder consultations.

## **3. Clarity around space use**

There are a number of areas in the plans where cycle and pedestrian traffic will exist in largely the same space.

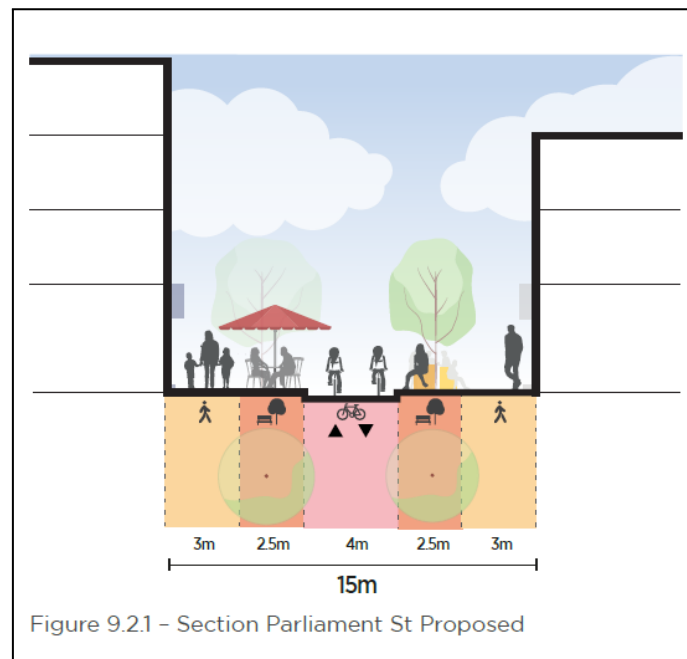
Our preference would be that all cycle lanes are clearly segregated from pedestrians where possible. Even with clear segregation there will be points at which cycle and pedestrian spaces intersect.

Pedestrians as the more vulnerable user should be given priority at these intersections. There should also be clarity around what kinds of cycles/scooters can use these spaces i.e. speed limits in line with national guidelines.

## 4. Making space for pedestrians

A number of points in the plan have areas marked “Flexible Zone for Activities and Street Furniture” or “Pedestrian Improvement Zone”

We ask that where space is allocated to commercial street furniture that adequate space remains for pedestrians (especially pedestrians with buggies or mobility aids). The proposal for Parliament Street seems to strike a good balance - we hope that at other points in the scheme pedestrian space is sufficiently prioritised.



We would also ask that where commercial space is allocated to restaurants, bars and cafés that these spaces not be fenced off in the manner that seems to be the norm in Dublin rather they be left more “open” as seems to be the norm in other European cities.



Temple Bar Square



More “open” commercial spaces



## **5. Re-routing**

We recognise that the intent of the plan is to reroute/eliminate traffic that is currently traversing the city centre. We ask that great caution is taken to ensure that traffic is not inadvertently routed through residential or other streets unsuitable for high volumes of traffic (e.g. school streets). Contact should be made with the main automated navigation providers (e.g. Google Maps) to facilitate this. Where streets are expected to incur a higher volume of traffic as a result of this plan additional measures should be implemented to slow traffic down and provide extra walking and cycling protection where appropriate.

## **6. Enforcement**

We ask that enforcement of restrictions (bus lanes, pedestrian zones, street furniture, etc.) required by the plan is given adequate focus. We appreciate that some of this will be outside the Dublin City Council's remit so the plan should commit to working with the relevant enforcement body. Where possible enforcement should be automated.

## **7. Monitoring**

We welcome the increased monitoring proposed in the plan. We suggest that an effort be made to communicate the consolidated set of measures (traffic, noise, air quality, etc.) to the public on an annual basis to demonstrate progress against the plan.

## 8. Gardiner Street

We welcome the two way cycle the length of the proposed. However, it is not clear:

- How the this lane will interface with the roads at either end
- How cyclists turning east from the scheme will be accommodated
- What trees will be selected to ensure the land is not unduly impacted by leaf fall
- How the scheme will interface with the historically important Mountjoy Square.

We hope that these will be addressed in detailed planning.

Mountjoy Square is an ACA and one of the few squares of its kind on the north side of the city. We are aware that there have been differing views on the future of the square. It would be beneficial to make a decision on the future for the square alongside the traffic changes on Gardiner Street.

## 9. Dorset Street

It is disappointing that Dorset Street has not been addressed as part of this plan. The street has much potential and an active community that have proposed plans for the area. We ask that Dorset Street be prioritised for inclusion in the next round of transport related planning.

## 10. Parnell Square North

We note the omission of any changes to Parnell Square North. Work has already been done on a proposal to pedestrianise this space so it seems strange that it was not included in the Dublin City Transport Plan. An accessible civic space in this area of the city would be a welcome addition. We ask that the Parnell Square North be prioritised for inclusion in the next round of transport related planning.

