

NDA submission for the DART+ West Project

Introduction

The National Disability Authority (NDA), as the independent statutory body provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities. We have a role to assist the Minister for Children, Disability, Equality and Integration in the co-ordination of disability policy. We work through our Centre for Excellence in Universal Design (CEUD) to promote the universal design of the built environment, products, services and information and communication technologies, so that they can be easily accessed, understood and used by everyone, including persons with disabilities.

The NDA welcomes the opportunity to make a submission to An Bord Pleanála concerning the DART+ West project and railway order, which is being managed by Irish Rail.

The NDA has previously strongly advised Irish Rail that a Universal Design approach needs to be adopted and implemented to ensure the provision of services that are easy to access, easy to understand and easy to use by everyone regardless of age, size, ability or disability. Further details of what was previously submitted by NDA to Irish Rail with regards to universal design is available in **Appendix I**.

In 2021 it was brought to the NDA's attention that the newly opened train station at Pelletstown was highlighted by several Disabled Persons Organisations (DPOs) and other stakeholders as having poor accessibility.

The NDA therefore, notes with concern that a similar design has been put forward for the update to Ashtown station. The NDA is aware that Irish Rail are looking to remove the disruption caused by level crossings to pedestrians and cyclists and are building new stations and updating some stations to address this. We would like to stress, however, that the proposed design of the Ashtown station, as with the design of Pelletstown station, presents barriers- not only to persons with disabilities but also older people and people with bags/luggage/prams etc. and should be re-visited.

Delivering Universally Designed DART+ West transport services

The NDA has previously advised that the DART+ West project should consider planning approaches that ensure that each element regarding the development and delivery of this programme includes accessibility as a key component to support all users to access transport services so they can participate in mainstream society. This includes persons with disabilities, older people and families with young children.

The NDA has advised that Irish Rail adopt and implement a Universal Design approach for every aspect of the DART+ West project as set out in this submission. Previous advice given to Irish Rail on this matter is summarised in **Appendix I** that also has relevance for An Bord Pleanála itself on how to ensure its services and information are accessible.

User testing (piloting) was highlighted in previous submissions to Irish Rail as an important part of this sustained engagement process. This should be a key consideration for future design of stations looking to eliminate disruption caused by level crossings. As mentioned above, feedback from the Pelletstown station project should be taken on board as part of the user testing process. This can assist with future designs. Temporary infrastructure should be considered as well, for example as part of any shared spaces, to facilitate user testing and implementation of improvements.

Infrastructure Considerations – a universal design approach

- **Accessible services** are one of the key criteria in the provision of universally designed services. Every aspect of the service including: the design of DART stations; the location of DART stations; the design and location of the proposed pedestrian level crossings; the pedestrian pathways; interchanges; way finders; tactile surfaces; the built environment; the number of transfers a person may need to make in one journey; and the exterior and interior design of the trains, need to be easy to access, easy to understand and easy to use for everyone regardless of age, size, ability or disability.

Station Design

The NDA understands that Irish Rail is seeking to greatly reduce the amount of level crossing disruptions for pedestrians and cyclists and that this strategy around level crossings has informed their design for new or updated stations.

In 2021 it was brought to the NDA's attention that the newly opened train station at Pelletstown was highlighted by several Disabled Persons Organisations (DPOs) and other stakeholders as having poor accessibility. While ramps were installed at this stations, these ramps are very long due to the height of the pedestrian bridge over the platform and present barriers to accessibility for a lot of people, particularly wheelchair users, and people with health or mobility related issues which would make climbing steps or taking a long ramp difficult. A key issue highlighted was the absence of any lifts at the station. When this issue was raised with Irish Rail, the NDA was told that the ramps provided are in compliance with Part M of the building regulations and that there were no plans to install lifts in this station. However, TGD M and standards such as BS8300 and IS EN17210 all note that where the rise of a ramp is greater than 2000mm, an alternative means of access for wheelchair users (such as lifts) should be provided. Ramps beyond this height become too tiring for wheelchair users.

The NDA therefore, notes with concern that a similar design has been put forward for the update to Ashtown station, again with the provision of steps and ramps, but no provision of lifts.

The NDA recommends that this current design is re-visited and that DPOs and persons with disabilities are consulted at all design phases when determining an alternative design. The NDA and CEUD are happy to provide further information and advice as required. The NDA wishes to point out requirements under the Disability Act (separate to building regulations) which should be considered in designing transport infrastructure;

- Section 25 of the Disability Act, 2005 states that public bodies should ensure that public buildings are, as far as practicable, accessible to persons with disabilities. And,
- Section 26 of the Act states that integrated access be provided to services provided by public bodies by persons with and without disabilities.¹

¹ "service" means a service or facility of any kind provided by a public body which is available to or accessible by the public generally or a section of the public and, without prejudice to the generality of the foregoing, includes— (a) the use of any place or amenity owned, managed or controlled by a public body, (b) the provision of information or an information resource or a

Appendix I

Previous Information and Advice

Information considerations

- **Accessible information** is one of the key criteria for universally designed services that should be incorporated into the proposed audit tool and for existing and future Irish Rail projects. All information (written, spoken, signed and digital) delivered by a public transport services provider (which includes consultation information), should be universally designed. The NDA suggests that Irish Rail should use the **Customer Communications Toolkit for the Public Service - A Universal Design Approach** which will help to produce universally designed written, verbal and digital communications that can be easily accessed, understood and used by everyone. Websites must comply with the accessibility criteria laid out in the **EU Directive on Web Accessibility 2016/2102**. Accessible information also includes audio visual announcements on public transport, information received from self-service terminals, processes for requesting information and making complaints.

Information and consultation

- The NDA recommended developing and publishing a strategy on the DART+ West website detailing how Irish Rail will ensure that any future impact assessments for this proposed project will **examine the potential effects this project could have on persons with disabilities and older people**. This strategy should also have a clear commitment from Irish Rail that it will ensure that every element of the proposed DART+ West project will meet the needs of persons with disabilities and older people
- Having a clear commitment in the DART+ West project that Irish Rail will **have a sustained engagement process with a diverse range of users**. This sustained engagement process could be achieved by establishing and consulting with an advisory committee that includes, persons with a range of disabilities, older people, architects, urban planners, IT professionals,

scheme or an allowance or other benefit administered by a public body, (c) any cultural or heritage services provided by such a body, and (d) any service provided by a court or other tribunal.

representatives from the local authorities and the NDA. This diverse level of expertise will help Irish Rail to address the different impacts that the proposed DART+ West project will have on the lived experience of all users of the built environment, public spaces, other transport services such as the bus and rail services, etc. To assist with consistent and meaningful engagement, the NDA would suggest consultation with our newly published guidelines [Participation Matters: Guidelines on implementing the obligation to meaningfully engage with disabled people in public decision making](#) which provides context on the requirements for engaging with Disabled Persons Organisations (DPOs), the importance of engagement with DPOs and how to gain meaningful engagement and input from engagement with DPOs and persons with disabilities.

- The NDA also suggested that the DART+ West project should contain an action and key deliverables for a **cross departmental approach** between Irish Rail, the NTA, the NDA, the public transport service providers, relevant Government Departments and related agencies to ensure the effective development and implementation of the proposed DART+ West project so that it will provide integrated universally designed public transport services
- It is also worth noting that under the **European Accessibility Act** electronic ticketing machines, check in machines and information terminals must comply with accessibility requirements set out in this Act. Member states are obliged to transpose the European Accessibility Act into national legislation by 28th June 2022 with implementation commencing from June 2025.

It is also worth noting that under the **European Accessibility Act** electronic ticketing machines, check in machines and information terminals must comply with accessibility requirements set out in this Act.

User Testing

- Impact assessments for this project should have user testing as a key criterion to facilitate the development and progression of this project. The NDA suggests a proposed action that could be included in the Preliminary Options Selection Report that Irish Rail and the proposed advisory committee could develop and pilot an audit tool to assess the capacity of the proposed project to provide integrated universally designed public transport services that are easy to access, easy to understand and easy to use by everyone regardless of age, size ability and disability. The NDA has previously stated that we are happy to advise Irish Rail on developing and piloting this audit tool so that all steps in the design and delivery of this project are inclusive and are compliant

with current and future proof for upcoming accessibility requirements in the new European Accessibility Act (EAA).

Monitoring and reporting

- The NDA's **Code of Practice on the Accessibility of Public Services and Information provided by Public Bodies** outlines the statutory obligations public bodies have in providing accessible services and information under section 26, 27 and 28 of the **Disability Act 2005**. These sections of the Disability Act 2005, incorporate the core elements of an integrated universally designed public transport service as mentioned previously. The NDA recommends that the DART+ West project use this Code of Practice to deliver an integrated universally designed public transport service. The NDA, has a statutory role to **monitor the implementation of this Code of Practice** and report our findings to the Minister.

Accessible Services

- All personnel involved in the planning and design of this project and all staff who will be providing public transport services on DART+ West should be trained to provide services and supports to persons with different disabilities and older people.
- The NDA recommends that all personnel involved in the planning and design of this project and all staff who will be providing public transport services on DART+ North should be trained to provide services and supports to persons with different disabilities and older people.
- The design and procurement of certain products and services must comply with **EU Directive 2019/882 on the accessibility requirements for products and services**. This Directive came into force in April 2019 but has not yet been transposed in Ireland. We also recommend that you implement the **European standard I.S. EN 17161:2019 'Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users'** when designing and procuring products, goods and services. This standard enables an organisation to apply a Universal Design approach for accessibility and meet its statutory and regulatory requirements in terms of accessibility of its products, goods and services.

Route considerations

- The NDA suggests that as part the DART+ West project that Irish Rail and the proposed advisory committee could commit to **reviewing the catchment areas** for the proposed route to determine if these areas have the capacity to provide integrated universally designed public transport services in enabling all local residents to be able to access and use the new stations
- The NDA notes that what is meant by 'accessibility' should be clearly defined. At times with regards to transport projects 'accessibility' denotes the proximity of transport infrastructure (stations, bus stops, etc.) to the public. As part of the sustained engagement process the NDA recommends that Irish Rail uses **a definition of accessibility** that details how every element of the proposed DART+ West project will be universally designed so that it is easy to access, easy to understand and easy to use by everyone regardless of age, size ability and disability. This definition of accessibility should also be applied to future assessments that will be carried out for the proposed DART+ West project and for Irish Rail's existing and future projects