

Submission No.			311		
Organisation Name or Name of Submitter			Voice of Vision Impairment		
Item No.	Section Ref.	Page No.	Observation Statement	TII Response	
Letter Re: VVI Submission on Metrolink.					
1	1. Introduction	1	<p>We are Voice of Vision Impairment (VVI), which, as per the UN Convention on the Rights of People with Disabilities (CRPD), is Ireland's national representative organisation regarding issues and rights relating to visually impaired people. In Ireland, such representative organisations as VVI are also known as Disabled Persons Organisations (DPOs).</p> <p>Under Article 4 (3) of the CRPD, as clarified by General Comment No. 7, DPOs must be prioritised in consultations relating to disability, including as first port-of-call, as well as in terms of views and opinions.</p> <p>For more information, see: NDA Participation Matters (Sept. 2022) https://nda.ie/publications/participation-matters-guidelines-on-implementing-the-obligation-to-meaningfully-engage-with-disabled-people-in-public-decision-making</p> <p>21.7.27 Legal Opinion on what is a DPO, commissioned by VVI https://vvi.ie/legal-opinion-for-vvi-as-a-dpo-for-all-dpos/</p>	<p>TII held a bi-lateral meeting with VVI in December 2022, following a wider meeting with the Luas User Group and some members of VVI. The aim was to talk through the Railway Order material in detail and to allow an opportunity to discuss key concerns and recommendations on the project itself, as well as to examine improved communication on image-focused material. TII recognises the difficulties and limitations associated with communicating large volume material – comprising images, technical drawings, maps etc - to those who are blind and vision impaired but continue to take advice on best practice from VVI and to try to develop effective narrative processes to enable full participation and engagement. Please refer to response item (2) below in relation to engagement that has been undertaken with VVI and the Luas User Group.</p>	
2	2. TII's Disablist Non-Consultation	1,2	<p>Rather than TII 'closely consulting with and actively involving' DPOs such as VVI, as it is required to do under Article 4 (3) of the CRPD, meaningful consultation on this project (Metrolink) was totally absent.</p> <p>The Luas User Group was consulted in a tokenistic way, but this was even more meaningless for VVI's representative, since the MetroLink presentation were image focused, so it was impossible to get a handle on the internal layout of stations or entrances/exits from a streetscape perspective.</p> <p>In short, this plan cannot have been properly disability-proofed, since no effort was made to make sure it was disability-proofed.</p>	<p>TII has consulted extensively with the User Group on Metrolink and has held several presentations and engaged in fruitful discussion with the Group, enabling members to interrogate the project and to set out concerns and recommendations. Feedback has largely been taken on board in the design. However, for some issues, it is more appropriate that they be addressed at detailed design stage. Further to the ratification of the UNCRPD, TII reached out to registered Disabled Persons Organisations (DPOs), inviting expressions of interest to participate in stakeholder engagement on this and other projects. TII has held a series of meetings with VVI and continue to engage. TII has committed in these meetings to hold a series of in-depth, thematic workshop at detailed design stage, on the infrastructure design, on operational issues and on construction-related issues - topics broached at the User Group and VVI meetings but which require focused workshops at the appropriate stage, to ensure that the detail is right. TII is committed to a Universal Design approach and to co-creation where possible and where appropriate. Through discussion with VVI, TII are continuously working to develop effective communication, including improving communication on image-focused material for people who are blind or visually impaired.</p> <p>As outlined in EIAR Chapter 6 (MetroLink Operations and Maintenance) section 6.8.2 Access for All, the proposed Project has been designed on the principle of Access for All. The design has been developed to meet all legislative requirements relevant to accessibility including the Disability Act 2005 and in turn the Sectoral Plan for Accessible Transport under the Disability Act 2005 (DTTAS 2012).</p>	
3	3. The Non-Technical Summary	2	<p>While quantity is not indicative of quality, the paucity of accessibility-specific planning in both respects is shockingly low in the Non-Technical Summary Document you have just shared with the LUG. Below are the 191 words, out of 37,000.</p> <p>It is as if the TII is operating like the State had never ratified the CRPD.</p>	<p>The Non-Technical Summary is a presentation of the EIAR in a concise and engaging manner which allows the public and key stakeholders to understand the proposed Project and the key environmental issues associated with it. This document summarises in non-technical language the EIAR, and therefore is not prepared to the same level of detail as the EIAR. Therefore the contents of the Non-Technical Summary are not exhaustive. EIAR Chapter 6 MetroLink Operations and Maintenance and Section 6.8.2 Access for All detail the many design and operational features included in the proposed Project to ensure accessibility for all.</p> <p>The Universal Design Principles adopted to make the proposed Project accessible for everyone to use, regardless of their age, gender, physical capabilities or cultural background, are detailed in Chapter 4 Description of the MetroLink Project.</p> <p>Please refer to response item 4 and 5 below in relation to consultation that has been undertaken.</p>	
4	3. The Non-Technical Summary	2	<p>It is as if TII sees disability-proofing as a box-ticking exercise, with passing nods to requirements under statutory instruments and the odd EU Regulation, and nothing else.</p>	<p>TII is fully committed to Universal Design and to positive engagement with people with disabilities, including as set out in the United Nations Convention for the Rights of Persons with Disabilities. TII will continue to engage with VVI and to address all of the feedback recorded to date, as well as issues that arise via the proposed thematic workshops. EIAR Chapter 6 MetroLink Operations and Maintenance section 6.8.2 Access for All details the features included in the proposed Project to ensure accessibility for all.</p>	

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5	3. The Non-Technical Summary	2	While the LUG in no way comes close to satisfying Article 4 (3) of the CRPD, there isn't even a nod to the LUG in terms of consultation, according to the NTS.	<p>The Non-Technical Summary is a presentation of the EIAR in a concise and engaging manner which allows the public and key stakeholders to understand the proposed Project and the key environmental issues associated with it. This document summarises in non-technical language the EIAR, and therefore is not prepared to the same level of detail as the EIAR. Therefore the contents of the Non-Technical Summary are not exhaustive. EIAR Chapter 6 MetroLink Operations and Maintenance and Section 6.8.2 Access for All details the many design and operational features included in the proposed Project to ensure accessibility for all.</p> <p>Appendix A8.18 (in relation to EIAR Chapter 8 Consultation), summarises the questions raised by stakeholders, including the National Disability Authority which requested 'Commitment in EIA Scoping Report that TII will have a sustained engagement process with a diverse set of users'. This led to the development of the Luas/MetroLink User Group, as identified in Appendix A8.18, with details of the impacts assessed in EIAR Chapter 10 (Human Health). Please refer to response item (2) above in relation to the engagement with the Luas User Group.</p>	
6	3. The Non-Technical Summary	2	TII arranged a bilateral meeting with VVI in December, and the chief architect went through some of the plans, but it was impossible for us to get a handle, since we still had no text description of the drawing plans.	<p>TII held a bi-lateral meeting with VVI in December 2022, following a wider meeting with the User Group and some members of VVI. The aim was to talk through the Railway Order material in detail and to allow an opportunity to discuss key concerns and recommendations on the project itself, as well as to examine improved communication on image-focused material. TII recognises the difficulties and limitations associated with communicating large volume material – comprising images, technical drawings, maps etc - to those who are blind and vision impaired but continue to take advice on best practice from VVI and to try to develop effective narrative processes to enable full participation and engagement.</p>	
7	3. The Non-Technical Summary	2	TII promised to send us a textual description of two planning drawings (two types of Metrolink station envisaged), but this never happened.	<p>TII remains committed to sending textual descriptions of the key planning drawings in advance of the Oral Hearing. TII has also committed to taking sample stations and honing the design in consultation with VVI - and other disability stakeholders - to ensure that universal design principles can be applied and embedded in the design.</p>	
8	4.1 Shared Space	2,3	We are concerned that vulnerable pedestrians will have to share space with two-wheeled vehicles (including bicycles, eScooters, electric bikes, etc. Such shared space would be reckless planning, and extremely dangerous to our visually impaired members.	<p>This is a valid concern and TII recognises that conflict can arise from poorly designed public space and that vulnerable walkers can be at risk from bikes, e-scooters and electric bikes etc. The Metrolink design seeks to make the layout its public spaces as intuitive as possible for all users, and to create identifiable and safe routes, through the use of landscape and differential paving and other devices. TII has committed to working with VVI and others on the detail of this, as part of the proposed thematic workshop process.</p>	
9	4.2 External Environment	3	We are worried about other shared space features, such as toucan crossings, and we are also concerned that raised/table crossings will be used, which can cause some of our members to lose balance when they veer off course.	<p>As detailed in Chapter 6 (MetroLink Operations and Maintenance) section 6.8.3 <i>Passenger Movement and Wayfinding</i>, the approaches to the station entrances are positioned to provide convenient access with minimal changes in level. Design features to facilitate safe access to the station entrance include signalised crossings, 'raised tables' within the roadway to reduce traffic speed at pedestrian crossings and dropped kerbs on pavements on both sides of the crossing to remove a trip hazard and aid wheelchair users or passengers with wheeled luggage. The detailed design of these crossings will be a feature of the proposed Thematic Workshops with VVI and the User Group, with the intention that a safe and effective solution can be found for all. TII have noted the concerns regarding raised tables and will engage with VVI and others on this particular design issue. Tactile paving surfaces will warn pedestrians with visual difficulties of the absence of a kerb and guide them in the direction of the crossing. Pedestrian routes will also be free of obstacles.</p>	
10	4.3 Finding the Stations	3	We are concerned that there will be no differential surfacing or sloping used so that a visually impaired person cannot independently locate a Metrolink station.	<p>The Metrolink design seeks to make the layout its public spaces as intuitive as possible for all users, and to create identifiable and safe routes, through the use of landscape, differential paving and other devices. TII has committed to working with VVI and others on the detail of this, as part of the proposed thematic workshop process. It is intended that the public spaces at the approaches to the stations will be clutter-free and clearly navigable for all users, allowing for safe and independent travel on Metrolink and adjacent public transport. Please refer to response Item 9 which details that differential surfacing (tactile paving) and dropped kerbs (sloping) will be used to assist with visually impaired persons, as detailed in Chapter 6 (MetroLink Operations and Maintenance) section 6.8.3.</p>	

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11	4.4. Plazas	3	We are worried that there will not be segregation of cyclists from vulnerable pedestrians in the plazas of stations and that there will not be proper and safe wayfinding for visually impaired pedestrians (e.g., raised beds or differential surfacing).	Please refer to response Items 8 and 10. TII has committed to working with VVI and others on the detailed design of station plazas, to avoid conflict between vulnerable pedestrians and cyclists.	
12	4.5 In-Station Wayfinding	3	We are concerned that the location of help-buttons will not be consistent in the stations, or that the operation of lifts will be accessible.	<p>It is intended that the layout of the station platforms will be as uniform as possible and that Help Points and other necessary equipment and accessibility features will be consistent and easy to locate for those who are blind or vision impaired. It is intended that Help Points will also be provided at other locations throughout the station, such as at the entrance concourse and at mezzanine level or elsewhere as agreed with the User Group. As outlined in Chapter 6 (MetroLink Operations and Maintenance) all platforms incorporate lifts for access purposes. All platforms will also feature help points, which incorporate induction loops for people with hearing impairments.</p> <p>All passengers will be able to pass easily through the station entrance and via stairs, escalators or lifts and walkways to the platforms. These features have been designed sufficiently wide to be accessible for wheelchair users as well as accommodate other design parameters, such as emergency evacuation. This is detailed in section 6.8.3.2 of Chapter 6 (MetroLink Operations and Maintenance).</p> <p>Passenger lifts will be located as close as possible to the stairs and escalators. Audio and Braille guides will be available, as well as a tactile map of the system to ensure visually impaired users are able to locate these. The lifts are designed to carry either 13 or 33 passengers depending on lift size. Additional specifications for the lift design include features such as tactile floor numbers for those who are visually impaired, the position of the lift controls for easy reach and signalling and illumination levels. Passenger lifts will provide access to all levels within the station and to both the northbound and southbound platforms from street level. Hazard warning surfaces will also be present at this bottom of stairs for visually impaired users, as set out in section 6.8.3.2 Wayfinding within the Stations (Chapter 6 MetroLink Operations and Maintenance). As detailed in section 6.4 of EIAR Chapter 6, information will be communicated effectively to the passenger regardless of ambient conditions or the passenger's sensory abilities (via different modes including pictorial, verbal and tactile).</p>	
13	4.5 In-Station Wayfinding	3	We are concerned that underfoot wayfinding for visually impaired people will not be intuitive.	Metrolink Station layouts have been designed to be as intuitive as possible, with uncomplicated pedestrian routes from street level to platform, avoiding dead-end or circuitous corridors. TII has committed to working with VVI and other users on the judicious use of tactile where appropriate. Please refer to response Item 9 which details that differential surfacing (tactile paving) and dropped kerbs (sloping) will be used to assist with visually impaired persons, as detailed in Chapter 6 (MetroLink Operations and Maintenance) section 6.8.3.	
14	5.1 Dangerous Doors	3	We are concerned that our members are liable to be pinched or caught in the closing of metro doors if they are not fully on the metro in time. We have been assured that the mechanisms will be ok, but with no detail given	As detailed in Chapter 6 (MetroLink Operations and Maintenance), whilst the starting and stopping of trains, the operation of train doors, and handling of emergencies will all be fully automated and not require staff, staff will still be present for other activities, including assisting passengers. In case an obstruction is detected, the design of the front edge of the sliding door will prevent the doors from closing completely, avoiding entrapments. The system shall be designed in a way that prevents wheel chairs, elderly, vulnerable or child passengers from getting trapped (hands, feet) during operation. This system is widely used on similar metros throughout the world.	
15	5.2 Emergencies, and Stopping a Metro	4	We have not been given the delay time between stops and if this can be extended if there are any problems (since the Metro is driverless).	<p>Dwell Time at Stations is the amount of time that a train stays in the station platforms so travellers can board and alight the train. The principal factors that influence the dwell time are: Doors opening and closing time, considering communication processes (activation for opening or closing, checking doors state, leaving order of the train, etc); number of travellers in each station and the time they require to enter or leave the train (also considering passengers of reduced mobility); trains features (seating arrangement, aisle width, space near doors, number and width of doors, etc.); stations design (location of platform accesses, platform width, position of the train stop, etc.); and the established operation intervals. All these factors considered, dwell time provides enough comfort for the service efficiency, quality and reliability.</p> <p>As detailed in section 6.6.3 of EIAR Chapter 6 (MetroLink Operations and Maintenance), passenger help points and emergency help points will be located in public areas for use by passengers to communicate with the Operational Control Centre through the MetroLink telephone system. This system will be linked with the CCTV system so that operators at the Operational Control Centre can view the scene, for example, if a person of reduced mobility or a visually impaired user requires additional time to board and alight the service.</p>	