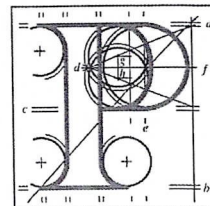


Our Case Number: ABP-314724-22



**An
Bord
Pleanála**

Voice of Vision Impairment
c/o Dr. Robert Sinnott
6 Riverrun
36-9 James's Street
Dublin 8
D08 NX85

Date: 19 January 2023

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to
Charlemont, Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the relevant County/City Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

RA05

Tel	Tel	(01) 858 8100
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

VVI Submission On Metrolink.

Details of Person Submitting:

Dr. Robert Sinnott,
#6 Riverrun, 36-9 James's Street, Dublin 8,
Aircode: D08 NX85
T: 086-3989365

1. Introduction.

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).

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.

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>

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/>

2. TII's Disablist Non-Consultation.

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.

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.

In short, this plan cannot have been properly disability-proofed, since no effort was made to make sure it was disability-proofed.

3. The Non-Technical Summary.

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.

It is as if the TII is operating like the State had never ratified the CRPD.

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.

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.

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.

TII promised to send us a textual description of two planning drawings (two types of metrolink station envisaged), but this never happened.

4. Practical Concerns.

4.1. Shared Space.

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.

4.2. External Environment.

We are worried about other shared space features, such as two can 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.

4.3. Finding the Stations.

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.

4.4. Plazas.

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).

4.5. In-Station Wayfinding.

- * 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.

- * we are concerned that underfoot wayfinding for visually impaired people will not be intuitive.

5. Boarding a Metro.

5.1. Dangerous Doors.

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.

5.2. Emergencies, and Stopping a Metro.

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).