

NDA submission to next round of consultation on BusConnects

13 December 2019

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 Justice and Equality in the co-ordination of disability policy. We work through our Centre for Excellence in Universal Design 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 works closely with the Department of Transport Tourism and Sport, the National Transport Authority (NTA) and related agencies to provide them with guidance and advice on developing and implementing integrated universally designed public transport services that are easy to access, easy to understand and easy to use for everyone, regardless of age, size, ability or disability. In the Disability Act 2005, Universal Design is defined as follows:

“Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people, regardless of their age, size or disability. This includes public places in the built environment such as buildings, streets or spaces that the public have access to; products and services provided in those places; and systems that are available including information and communications technology (ICT).”
(Disability Act, 2005)

In this context, the NDA therefore welcomes the opportunity to make a submission to the NTA’s consultation on the revised BusConnects Proposal. This submission incorporates advice we have previously given the NTA regarding different aspects of the BusConnects project.

The **Revised BusConnects Proposal for the Dublin Area Bus Network Redesign (2019)** states that Dublin city can only grow and prosper if the increasing traffic congestion in the city is resolved. According to the 2016 National Travel Survey 59% of people in Dublin City travel by car compared to 13% that use public transport.

The primary objectives of the Revised BusConnects Proposal are:

- To reduce traffic congestion by encouraging more people to use public transport such as bus
- To encourage more people to use public transport by redesigning the physical infrastructure of the bus network to enable people to get to more places sooner

The Revised BusConnects Proposal states that the current bus network consists of radial corridors served by a number of overlapping routes that connect neighbourhoods and suburbs to the City Centre. The radial corridors provide direct services between many places, but many individual routes are not very frequent, so wait times can be long.

The main features of the proposed redesign will consist of:

- A single line or **spine** being placed on each radial corridor to facilitate frequent services that will come every 3 to 8 minutes. It is proposed that most of the bus routes that flow into the centre of Dublin will be reorganised into eight spines and they will operate across the city. Spines would be designated by the letters A to H.
- Each spine would consist of a combination of two to five bus routes known as **spine branches** that operate with staggered timetables to provide high frequency on the “spine” segment. Branches leading to and from the same spine share a letter (e.g. “A”) but have different numbers (e.g. “A1”, “A2”, “A3”, “A4”) It is proposed that most **spine branches** will have all day services running every 10 to 15 minutes. It is proposed that no interchange will be required where the branches merge to form the spine.

The Revised BusConnects Proposal states that an increased number of interchanges or transfers from one bus service to another bus service/ rail is acceptable if it leads to improved travel time.

Encouraging more people to use public transport and reduce the level of car ownership is the key objective of an international trend called Mobility As A Service (MAAS), where transport is perceived as a “service” that enables mobility for everyone regardless of age, size, ability or disability. Supporting more people to shift from using their cars to using public transport is also a key objective of the Department of Transport, Tourism and Sport’s **A New Vision for**

Sustainable Mobility. A Review of Ireland's public transport and active travel policy (2019). This review aims to link people and places throughout Ireland in a sustainable way.

However, the concept of Mobility As A Service and A **New Vision for Sustainable Mobility** also examine how transport can be developed into an integrated universally designed service that is easy to access, easy to understand and easy to use for everyone regardless of age, size, ability or disability.

The NDA notes with concern that the Revised BusConnects Proposal does not include a number of key points that we had previously advised regarding the different elements of the proposed BusConnects project. The NDA strongly advises that the NTA addresses the following key points in the Revised BusConnects Proposal:

- How will the proposed redesign of the bus network enable more persons with disabilities and older people to use public transport and how will this cohort of people then be able to get to more places in less time given the specific challenges involved for them as outlined in this submission?
- There is no reference to persons with disabilities regarding the proposed redesign of the bus network. The Revised BusConnects Proposal does state that 95% of areas that have no interchange/transfers on their services into the City Centre will be kept in the proposed bus network redesign to minimise the impact on vulnerable populations. However, NDA advises that this description of particular populations as 'vulnerable' is not suitable in this context. The NDA suggests that a more suitable term to use in this Proposal could be persons with disabilities and persons with reduced mobility. The NDA also suggests that Revised BusConnects Proposal should include a clear definition of persons with disabilities and persons with reduced mobility to ensure that the proposed bus networks meets the travel needs of persons with different capacities and support needs. The NDA advises that the following definition of persons with disabilities and persons with reduced mobility should be included in the Revised BusConnects Proposal:
 - Persons with physical disability (wheelchair user, mobility-impaired, difficulty in standing, gripping or holding)
 - Sensory disability (blind, visually impaired, deaf, audibly impaired)
 - Persons with speech impairments
 - Persons with orientation difficulties
 - Persons with small stature; large people
 - Persons with psychosocial disabilities or mental ill-health issues

- Persons with cognitive disabilities that include persons with intellectual disabilities and persons with autism spectrum disorders^{1 2}

The Revised BusConnects Proposal could also consider using the following definition of persons with disabilities as detailed in **International Organisation for Standardization’s (ISO) and the International Electrotechnical Commission’s (IEC) Guide 71: 2014 (E), a Guide for addressing accessibility in standards**. This definition is as follows: “people from a population with the widest range of characteristics and capabilities” incorporates “people regardless of age, size, ability and disability.” **Guide 71: 2014 (E)**, explains and describes the characteristics, capabilities and preferences of persons with different disabilities^{3 4 5}.

- Access is defined in terms of “where people could get to in a given amount of time.” The NDA advises that term “access” should be refined in the Proposal, in the context of providing transport services that are accessible to everyone. The NDA has previously advised that the NTA should define access to transport services or the accessibility of transport services using the definition of accessibility as detailed in **International Organisation for Standardization’s (ISO) and the International Electrotechnical Commission’s (IEC) Guide 71: 2014 (E), a Guide for addressing accessibility in standards which is** “the extent to which products, systems, services, environments and facilities can be used by people from a population with the widest range of characteristics and capabilities to achieve a specified goal in a specified context of use”^{6 7 8}

¹ European Transport Commission’s Report on the Accessibility of Urban Public Transport to People with reduced mobility (2003)

² European Parliament's Committee on Transport and Tourism (TRAN)’s study on Transport and tourism for persons with disabilities and persons with reduced mobility (2018)

³ ISO 26800, Ergonomics — General approach, principles and concepts

⁴ ISO/TR 9241-100, Ergonomics of human-system interaction — Part 100: Introduction to standards related to software ergonomics

⁵ ISO/TR 22411, Ergonomics data and guidelines for the application of ISO/IEC Guide 71 to products and services to address the needs of older persons and persons with disabilities

⁶ ISO 26800, Ergonomics — General approach, principles and concepts

⁷ISO/TR 9241-100, Ergonomics of human-system interaction — Part 100: Introduction to standards related to software ergonomics

⁸ ISO/TR 22411, Ergonomics data and guidelines for the application of ISO/IEC Guide 71 to products and services to address the needs of older persons and persons with disabilities

- According to the 2016 Census, persons with disabilities make up 13.5% of Ireland's population and the number of people aged 66 has increased to 637,567 people (13.4% of the population) . It is estimated that by 2026, persons with disabilities would account for roughly 16% of the population . If this cohort of Irish society cannot access public transport via the proposed bus network, then it will be difficult to achieve the objective of getting more people to more places in less time. In this context the NDA also suggests that the Revised BusConnects Proposal may wish to review proposed times it may take for people to walk to and from a bus stop, or to transfer from one service to another. The time will differ from person to person depending on the disability they may have. This is an important consideration for the proposed BusConnects' project.
- There is little evidence in the Revised BusConnects Proposal of how the proposed bus network will support persons with disabilities, older people and other travellers to complete their end to end journey to different destinations from accessing travel information to returning home. The effectiveness of the redesigned bus network is defined solely in terms of how quickly it will enable people in the Dublin area to get to jobs and universities as this signals that access to many other activities would improve as well. It is estimated that if the redesigned bus network is implemented that the average resident of the Dublin area could reach +28% more jobs and student enrolments within 30 minutes, +21% within 45 minutes and +16% in 60 minutes.

However, the NDA has previously advised that a key objective of any transport service should be to support everyone, including persons with disabilities, to travel to where they want to go and to participate in mainstream activities such as shopping, socialising, going to medical appointments etc., noting that these activities might be situated at some distance on the proposed spines and spine branches. It would be important that the Revised BusConnects Proposal ensures that persons with disabilities can get to different destinations using the proposed bus network.

The NDA is aware of the NTA's commitment to improving the accessibility of public transport services to people with disabilities. We will continue to work with the NTA to ensure that the above points are addressed and implemented regarding the Revised BusConnects Proposal.

The NDA advises that if the Revised BusConnects Proposal wishes to increase the number of people using public transport then its primary objective should be to deliver a bus network that provides an integrated universally designed public transport service that is easy to access, easy to understand and easy to use for everyone, regardless of age, size, ability or disability. The core elements/criteria of these this type of service are:

- Providing accessible services
- Having policies in place to ensure that accessibility is a key criterion for procurement and tendering processes
- Providing written, spoken and digital information in accessible formats.
- Having an accessible complaint processes, including having a Complaints/Inquiry Officer to respond to and resolve complaints.

As previously mentioned, the NDA has already advised the NTA on the importance of implementing the key points we have advised them on the Revised BusConnects Proposal. The NDA's submission will therefore focus on the following additional points that the Revised BusConnects Proposal should incorporate to assist in the development and delivery of an integrated universally designed public transport service. The key points of our submission are summarised below:

- In 2006, the NDA developed a **Code of Practice on the Accessibility of Public Services and Information provided by Public Bodies** to monitor public bodies' compliance with Sections 26-28 and Sections 38-39 of the Disability Act 2005. These sections of the Disability Act 2005 detail the obligations public bodies have to provide accessible services and information. These Sections of the Disability Act 2005, incorporate the core elements of an integrated universally designed public transport service as mentioned previously. The NDA suggests that the Revised BusConnects Proposal could use this **Code of Practice** to develop a framework for the **delivery and monitoring** of services provided by the proposed bus network, to ensure that it provides an integrated universally designed public transport service. While this **Code of Practice** applies to services provided by public bodies, it dovetails with the key recommendations made in **Accessibility of Public Transport Services for Persons with Disabilities (2018)** produced by the Joint Committee on Transport Tourism and Sport. As such this framework could also be applied to services provided by licensed commercial bus and coach operators on the proposed redesigned network. The Development and Implementation Plan for the Revised BusConnects Proposal should include an action to develop and utilise this framework.
- The NDA advises that a **travel chain analysis** should be used as part of the framework for delivering the proposed bus network. This type of analysis is used to determine if the urban environment for the proposed bus network is universally designed. This travel chain analysis could be used to pilot a number of stages of the proposed bus network to determine if the proposed bus network will deliver integrated universally designed public transport services for the mix of users we have outlined in this submission.

- The NDA also advises that a joined up approach between the Department of Transport Tourism and Sport, the NTA, the local authorities and other relevant agencies, public and private transport providers, the NDA and the disability sector will be required to ensure that Revised BusConnects Proposal will deliver an integrated universally designed public transport service.
- The NDA is aware that the NTA has held previous consultations regarding BusConnects and that the NTA held a specific consultation event with persons with disabilities on Wednesday 04 December 2019. However, the NDA suggests that the NTA could extend the range of users, including persons with disabilities and older people, it engages with over a sustained period of time regarding the development, delivery and monitoring of the proposed bus network. The NDA also suggests that the NTA should create an advisory panel of a diverse range of users to provide feedback on the different stages of the project. Persons with disabilities and older people will be able to inform the NTA on how long it will actually take them to get to a bus stop, or transfer from one service to another. This feedback will assist the NTA to deliver a bus network that provides an integrated universally designed public transport service that is easy to access, easy to understand and easy to use for everyone regardless of age, size, ability or disability.
- The NDA also previously suggests that this advisory panel could also user test a pilot/experimental version of the proposed bus network. The Development and Implementation Plans for the Revised BusConnects Proposal should include an action to develop this advisory panel with a diverse range of users.

The importance of an integrated universally designed public transport system that provides services that are easy to access, easy to understand and easy to use for diverse communities including persons with disabilities is detailed in a number of policy initiatives including **the Comprehensive Employment Strategy for People with Disabilities 2015 – 2024; Articles 9 and 20 of the UN Convention on the Rights of Persons with Disabilities; The Accessibility of Public Transport Services for Persons with Disabilities Report (2018); and the National Planning Framework for Project Ireland 2040.**

The NTA can meet its commitments under these various policy initiatives by ensuring that the Revised BusConnects Proposal focuses on delivering a bus network that provides integrated universally designed transport services.

Framework for delivering and monitoring integrated universally designed public transport services

In 2006, the NDA developed a **Code of Practice on the Accessibility of Public Services and Information provided by Public Bodies** to monitor public bodies' compliance with Sections 26-28 and Sections 38-39 of the Disability Act 2005. These sections of the Disability Act 2005 detail the obligations public bodies have to provide accessible services and information. These obligations are similar to the core elements of an integrated universally designed public transport service which are as follows:

- Provide accessible services
- Have policies and processes on accessible procurement
- Provides information in accessible formats;
- Have accessible complaints processes, including having a Complaints/Inquiry Officer to respond to and resolve complaints

The NDA suggests that the NTA could use our **Code of Practice on the Accessibility of Public Services and Information provided by Public Bodies** to develop a framework for the delivery and monitoring of transport services provided by the proposed BusConnects network. Using this type of framework will help the NTA to ensure that this project delivers transport services that are easy to access, easy to understand and easy to use, for everyone, regardless of age, size, ability or disability. The NDA advises that the development of this framework should be included as an action in the Revised BusConnects Proposal and in a subsequent Development and Implementation Plan for this project.

Delivering Integrated Universally Designed Public Transport Services

If the Revised BusConnects Proposal uses the NDA's **Code of Practice** to develop the framework for the delivery of the proposed bus network then the key criteria that will be used in the framework will be as follows:

- **Section 26 of the Disability Act 2005, Access to Services**

Section 26 of the Disability Act 2005 states the public bodies where practicable must:

- (i) Ensure that their services are accessible to persons with disabilities.

- (ii) Provide assistance where necessary to persons with disabilities.
- (iii) Have an Access Officer to assist persons with disabilities with any queries they may have about making the journey

(i) Accessible Services

In the context of BusConnects this means that all elements of the service on the proposed network are integrated and universally designed so that they are easy to access, easy to understand and easy to use. This includes:

- The location and design of bus stops, pavements, interchange and transfer points
- The external and internal design of buses providing services on the proposed bus network and the design of rail, DART and Luas services that are connected to this network.
- The current limitations and challenges with the buses themselves, e.g. even where there is space and a functioning ramp, it is not always used appropriately
- Drop off and departure points i.e. a car dropping off near a bus stop, or a taxi pulling out from a bus stop
- Design of bus stop shelters and proposed interchange locations/ platforms
- Entrances and exits to bus stations such as Bus Aras and trains stations/ Luas stops on the proposed bus network and services in bus and train stations such as ticket kiosks, toilet etc.

The NTA, the public transport service providers and the local authorities will need to work together to ensure that access to and from bus stops, bus shelters and interchange/transfer points are universally designed.

Interchanges/Transfers

Careful consideration also needs to be given to the use of interchanges/ transfers in the Revised BusConnects Proposal. The NDA advises that persons with different disabilities may have different challenges with making numerous transfers in one journey. Some of these challenges may include:

- A person using a wheelchair having to take different trains and or buses to work. If they are not guaranteed access to a wheelchair space on each of these modes of transport they may be consistently late to work or unable to get to work. Unless there is adequate shelter at each of these interchange points, this person may possibly end up waiting for trains or buses in adverse weather conditions

- A person with autism spectrum disorder or a person with an intellectual disability may require significant supports to get them from A to B. Having to make transfers from one train to another or to a bus will cause significant changes in their journeys. They may find it very difficult to adjust to these changes and to use these new services
- What will each interchange point look like? Will each interchange point be located beside each other or parallel to each other?
- Will each of these interchange points have accessible wayfinding options with signage and maps in accessible formats to enable people with different disabilities to get from A to B to C? Will some of these interchange points be manned by staff who are trained to assist persons with different disabilities get from one interchange point to another and from one mode of transport to another?
- Careful consideration also needs to be given as to how the proposed BusConnects project will connect effectively with other services such as buses, trains, the Luas and taxi services. A detailed plan of action with clear KPIs and timeframes needs to be developed and delivered to ensure that this proposed bus network links into other transport services in a way that is easy to access, easy to understand and easy to use.

Bus Design

The Revised BusConnects Proposal states that there is a possibility that a new fleet of buses may be introduced. On 17 July 2018, the NDA and the NTA co-hosted a consultation attended by over 40 people, that included persons with disabilities and older people, some of whom had never engaged with the NTA before. There were a number of recommendations from this consultation but as a result of this event Go Ahead changed the colour of the buses' livery to yellow on the front and sides of the bus. The buses are therefore more visible and recognisable to persons with visual impairments, persons with intellectual disabilities, persons with autism spectrum disorder, older people, visitors and tourists. The colour of the poles in the interior of the buses were also changed to yellow ensuring that they are more visible and recognisable to a range of different users including persons with different disabilities.

The recommendations from this consultation focused on designing buses that were universally designed. The NDA suggests that these recommendations should be applied to any new fleet of buses that may be introduced as part of the Revised BusConnects Proposal.

Additionally, space for wheelchairs is still a challenge which is in part about managing passenger behaviour, driver training etc., for example where:

- Ramps are not being lowered for all customers

- Repair of ramps is required
- Freeing up of wheelchair space is necessary
- Allowing time for passengers with mobility impairments to get from a seat to the door etc

Travel Chain Analysis

The NDA suggests that the NTA and relevant agencies use a travel chain analysis to determine if the urban environment around the bus network is universally designed. At a macro level this type of analysis can be used to determine if the following features of the urban environment such as:

- The proposed bus network is taken from a universally designed
- The systems and procedures that are to be implemented including procurement, information in digital and print of the proposed bus network are universally designed

At a micro level, the travel chain analysis can be used to determine if the following features of the urban environment such as pavements to and from the bus stop, the design of the bus stop and/or the bus shelter are universally designed. More details on can be found in **Book 9 of the Building for Everyone Series**, which is a suite of guidance produced by the NDA that provides comprehensive best practice guidance on how to design, build and manage buildings and spaces so that they are universally designed. This guidance is on the NDA website at <http://universaldesign.ie/Built-Environment/Building-for-Everyone/>

As stated previously, this travel chain analysis could be used to pilot the proposed bus network to ensure that it will deliver an integrated universally designed public transport service. The NDA is happy to meet with the NTA to discuss this in greater detail.

(ii) Providing Assistance

The NDA advises that the Revised BusConnects Proposal should include an action regarding the provision of sufficient staff in a customer service department to assist persons with disabilities with any questions or assistance they made need in accessing, understanding or using the proposed bus network. In the initial stages, it may be advisable to have staff at any interchange/transfers on the proposed bus network to provide any necessary assistance to persons with disabilities, older people etc.

The NDA suggests that information about the BusConnects customer service policy and contact information for its customer service team should be in accessible formats on the home page of the BusConnects' website.

The NDA is aware that the NTA and the Department of Transport, Tourism and Sport is in the process of developing a centralised hub, or a single point of access portal, to provide travel information and journey planning on an intermodal basis in line with **Recommendation 4.2 of the Accessibility of Public Transport Services for Persons with Disabilities (2018)**. The NDA advises that when this hub has been established, that staff have the knowledge and expertise to assist persons with disabilities with questions and issues on BusConnects. The NDA also suggests that the information and contact details for this hub are available in accessible formats on the homepage of the NTA's or the Department of Transport Tourism and Sport's websites. The NDA suggests that while this centralised hub is being established that information on the BusConnects' complaints process should be available in accessible formats on the home page of the BusConnects' website. Additionally, the Real Time system for responses to identified problems should also be available in accessible formats.

Staff Training

Providing all staff, including management, with disability awareness training is an important element regarding the provision of universally designed services. All staff providing public transport services, from the drivers to the customer service representatives, need to be equipped with the skills to communicate with and to provide any necessary supports to persons with different disabilities and support needs.

(iii) Access Officer

The NDA suggests that an Access Officer would be given responsibility for dealing with questions from persons with disabilities that may arise regarding the proposed bus network.

The NDA also suggests that information regarding the role and relevant contact information should be on the homepage of the BusConnects website.

The Access Officer may become part of the previously mentioned centralised hub that is currently being established, but in the meantime it would be important than an Access Officer is appointed for this project.

• Section 27 of the Disability Act 2005, Accessible Procurement

Under Section 27 of the Disability Act 2005, public bodies where practicable should ensure that services they procure that will be used by the public are accessible to persons with disabilities.

The NDA advises that the NTA should ensure that policies and processes regarding the tendering and procurement of services for the Revised BusConnects' Proposal have accessibility/universal design as a key criterion.

- **Section 28 of the Disability Act 2005, Access to Information**

Under Section 28 of the Disability Act 2005, public bodies are required to provide information in accessible digital, written, spoken and signed formats.

The NDA advises that the Revised BusConnects Proposal should contain actions to ensure that travel information on the proposed bus networks such as timetables, real time information, travel delays on services and routes, emergencies, cancellations of service and alternative transport arrangements are provided in accessible digital, written, spoken and signed information. Ensuring that audio visual announcements on all buses and connecting Dart/Rail and Luas services should also provide accurate information is also an important part of providing accessible services.

Persons with disabilities need to access information to plan their end to end journey from beginning to the end. It is therefore crucial that the BusConnects' website and the websites of transport service providers providing services on the proposed bus network are universally designed. The websites must comply with the accessibility criteria laid out in the **EU Directive on Web Accessibility 2016/2102**. This Directive came into force in September 2018 but has not yet been transposed in Ireland. The NDA suggests that the NTA and transport service providers should use the **Customer Communications Toolkit for the Public Service - A Universal Design Approach**. This toolkit was co-developed by the Centre for Excellence in Universal Design (CEUD), at the NDA and the Department of Public Expenditure and Reform. This aim of this toolkit is to help public bodies to produce universally designed written, verbal and digital communications that can be easily accessed, understood and used by everyone. In 2019, this toolkit won top prize at the National Adult Literacy Agency (NALA)Plain English Awards, in the category, Best use of plain English by an organisation. This toolkit can be downloaded from the NDA's website at:

<http://universaldesign.ie/Products-Services/Customer-Communications-Toolkit-for-the-Public-Service-A-Universal-Design-Approach/>

Mobile apps also need to be universally designed, in addition to information provided at bus stops and at bus stations.

The NDA suggests that that Revised BusConnects Proposal could also develop and publish a communications strategy on the home page of their website, in accessible formats, detailing how persons with hearing loss/who are deaf can access their services. This statement could include the steps they are taking to improve the accessibility of their services such as having designated customer service representatives who are trained in Irish Sign Language and how this will positively affect persons with disabilities to complete their end to end journeys. The Revised BusConnects Proposal may also wish to consider having videos with captions and Irish Sign Language, that explain how persons with hearing loss/who

are deaf can access their services, make complaints and provide feedback on transport services. Additionally, alerts regarding problems for services users, e.g. a delayed train, should be made available in accessible formats for all service users.

- **Section 38 of the Disability Act 2005, Accessible Complaints Process**

Under Section 38 of the Disability Act 2005, public bodies must have an accessible complaint process in place.

The NDA is aware that the NTA and the Department of Transport, Tourism and Sport is in the process of developing a centralised hub, or a single point of access for complaints and feedback regarding barriers to accessing public transport across all modes. This action is in line with **Recommendation 7 of the Accessibility of Public Transport Services for Persons with Disabilities (2018)**. The NDA suggests that when this hub has been established that information on the complaints process and the contact details for the relevant personnel should be available in accessible formats on the homepage of the NTA's or the Department of Transport Tourism and Sport's websites.

The NDA suggests that while this centralised hub is being established that information on the BusConnects' complaints process should be available in accessible formats on the home page of the BusConnects' website.

- **Section 39 of the Disability Act 2005, Inquiry Officer**

Public bodies should have an Inquiry Officer in place to respond to and resolve complaints, particularly from persons with disabilities.

The NDA notes that when the centralised hub for customer complaints and feedback is established that persons with disabilities can contact personnel in this hub regarding issues with the proposed bus network.

The NDA suggests that while this centralised hub is being established that contact details for the BusConnects' Inquiry/ Complaints Officer should be available in accessible formats on the home page of the BusConnects' website.

Monitoring integrated universally designed public transport service

As previously mentioned, the NDA has suggested that the Revised BusConnects Proposal should also use the NDA's **Code of Practice** to develop the framework for monitoring the transport services that will be provided by of the

proposed bus network. The criteria that will be used to monitor these services will therefore incorporate the core elements of providing an integrated universally designed public transport service. These criteria are as follows:

- Access to Services
- Accessible Procurement Processes
- Access to Information
- Accessible Complaints/Feedback Process including having a Complaints/Inquiry Officer to respond to and resolve complaints

The NDA is currently in the process of discussing with the NTA the possibility of including a number of questions based on the above criteria in their quarterly reports that they issue to all licensed transport services. These reports are used to determine if service providers are providing efficient and punctual public transport services.

The inclusion of these questions in the quarterly reports would provide the NTA with the opportunity to monitor the progress that the proposed BusConnects project is making in delivering an integrated universally designed public transport service that is easy to access, understand and use for everyone, regardless of age, size, ability or disability.

A Joined Up Approach

The Revised BusConnects Proposal states that the NTA is working with local authorities and other relevant agencies regarding the development and delivery of the proposed bus network. The NDA advises that a joined up approach will be required to ensure that the Revised BusConnects Proposal delivers an integrated universally designed public transport service. The NTA and the Department of Transport Tourism and Sport will need to work closely with local authorities; public and private transport providers; the NDA; the disability sector and other relevant agencies to achieve this objective.

A joined up approach will also be required to encourage more people to use public transport and to reduce the use of cars in Dublin city, in line with the concept of Mobility As A Service (MAAS). This shift towards increased usage of public transport services will also require more integration between public transport and innovative mobility solutions, such as:

- car- and bicycle-sharing, e.g. Dublin, Cork bicycles, - Car Sharing (GoCar and Toyota Car club in Dublin). Research shows that 1 car share vehicle

- can replace up to 15 private cars and this could have the ability to transform the use of urban streets and spaces⁹
- Electric Cars – lack of sound is seen as a safety issue
 - app-enabled on-demand micro-bus services, and
 - IT platforms that connect app-using travellers and drivers

An additional consideration will be the provision of adaptable vehicles for persons with reduced mobility who will be unable to use the standard accessible vehicles such as the regular buses or taxis.

The NDA advises that the Government may need to implement clear regulations and policies to ensure that this integration does not lead to reduced mobility options for those that have difficulty using existing modes of transport. A planned approach will need to be applied to ensure that the needs of an ageing population are met in an evolving mobility service landscape.

Extending the Range of Users

The NDA suggests that the Revised BusConnects Proposal and Development and Implementation Plans should include an action to extend the range of users, including persons with disabilities and older people it engages with over a sustained period of time regarding the development, delivery and monitoring of the proposed bus network.

The NDA has suggested that the NTA may find the new standard - **Design for All – Accessibility following a Design for All approach in products, goods and services – Extending the range of users. Irish standard EN 17161:2019** useful in this regard. This standard was developed by the Centre for Excellence in Universal Design at the NDA and the National Standards Authority Ireland in 2019 and specifies requirements and recommendations that enables an organization to extend their range of users by identifying diverse needs, characteristics, capabilities, and preferences, by directly or indirectly involving users, and by using knowledge about accessibility in its procedures and processes.

The NDA has also advised that it would be important for the NTA to engage with persons with disabilities who are not currently using public transport services to capture any previous experience they may have had of public transport and the reasons why they do not use public transport. This was one of

⁹ Transport Co-operative Research Programme 108 (2005) Car-Sharing: Where and How it succeeds. <http://www.ccdcboise.com/wp-content/uploads/2016/02/Document-DI-TCRP-Car-sharing-Where-and-How-It-Succeeds.pdf>

the recommendations in the report on **Accessibility of Public Transport for People with Disabilities** produced by the Joint Committee on Transport, Tourism and Sport in November 2018.

As stated previously, this diverse range of users could also user test a pilot of the proposed bus network to ensure it will deliver an integrated universally designed transport service.

Conclusion

The NDA is happy to meet with the NTA to discuss this submission. The NDA looks forward to continuing to work with the NTA and relevant agencies to develop and implement integrated universally designed public transport services that are accessible to everyone regardless of age, size, ability or disability.