

Submission from the National Disability Authority to the Environmental Assessment Scoping Report for Metrolink

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 welcomes the opportunity to make a submission to the Environmental Impact Assessment Report for the proposed Metrolink project which is being managed by Transport Infrastructure Ireland (TIL) on behalf of the National Transport Authority (NTA).

TIL are inviting submissions to answer the following questions:

- Is the scope of the proposed assessment for the Environmental Impact Assessment Report adequate?
- Is there additional information that should be considered in the development of the proposed Project?
- Are there any additional environmental issues that should be taken into consideration in preparing the Environmental Impact Assessment Report?

The NDA acknowledges the depth and breadth of the Environmental Impact Assessment Scoping Report. In response to the three questions posed, the NDA strongly advises TIL that a Universal Design approach needs to be adopted and implemented regarding the Environmental Impact Assessment Scoping Report for the proposed Metrolink and for the development and implementation of each step of this proposed project.

In particular, the NDA advises on concerns about the impact of this proposed project for persons with disabilities that could be teased out through the approaches advised below.

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

November 2018 recommended that public transport services need to be universally designed so that they are easy to access, easy to understand and easy to use by everyone regardless of age, size, ability or disability. By developing and implementing a Universal Design approach to the Environmental Impact Assessment Scoping Report for the proposed Metrolink project in addition to the entire project, TIL will be putting the Committee's recommendations into practice.

The NDA advises that TIL can adopt and implement this Universal Design approach for the Environmental Impact Assessment Scoping Report and for every aspect of the proposed Metrolink project as set out in this submission, which is summarised as follows:

- Developing and publishing a strategy on the Metrolink's website detailing how TIL will ensure that the Environmental Impact Assessment Scoping Report and 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 TIL that it will ensure that every element of the proposed Metrolink Project will meet the needs of persons with disabilities and older people
- Having a clear commitment in the Environmental Impact Assessment Scoping Report that TIL will have a sustained engagement process with a diverse set of users. This sustained engagement process could be achieved by establishing and consulting with an advisory committee that includes, persons with different disabilities, older people, architects, urban planners, IT professionals, representatives from the local authorities and the NDA. This diverse level of expertise will help TIL to address the different impacts that the proposed Metrolink project will have on other transport services such as the Luas, bus and rail services, the built environment, public spaces etc.
- As part of the sustained engagement process that TIL uses a definition of accessibility that details how every element of the proposed Metrolink 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 could also be applied to future assessments that will be carried out for the proposed Metrolink project and for TIL's existing and future projects.
- User testing will be an important part of this sustained engagement process. The Environmental Impact Assessment Scoping Report and future 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 the a proposed action that could be included in the Environmental Impact Assessment Scoping Report is that TIL and the proposed advisory committee could develop and pilot an audit tool to assess if the proposed Metrolink

project will in practice 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 is happy to advise TIL on developing and piloting this audit tool

- 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 TIL projects. All information provided by public transport services providers including written, spoken and digital (websites and mobile apps), should be universally designed. Accessible information also includes audio visual announcements on public transport and processes for requesting information and making complaints
- Accessible services are another key criteria in the provision of universally designed services. All staff providing public transport services should be trained in providing services and supports to persons with different disabilities and older people. Every aspect of the service including: the exterior and interior design of the trains; the design of train stations; the location of train stations; the design and location of the proposed Park and Ride facility, the built environment and the number of transfers a person may need to make in one journey, need to be easy to access, easy to understand and easy to use for everyone regardless of age, size, ability or disability

The NDA suggests that as part the Environmental Impact Assessment Scoping Report that TIL and the proposed advisory committee could commit to reviewing the catchment areas for the proposed Metrolink project to determine if these areas have the capacity to provide integrated universally designed public transport services.

The NDA also suggests that the Environmental Impact Assessment Scoping Report should contain an action and key deliverables for a cross departmental approach between TIL, 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 Metrolink Project so that it will provide integrated universally designed public transport services.

Rationale for adopting the Universal Design Approach

The Environmental Impact Assessment Scoping Report states that the overall objective of the proposed Metrolink project is to:

“provide a high capacity, high frequency rail line running from Swords to Charlemont linking Dublin Airport, Irish Rail, DART, Dublin Bus and Luas

services, creating fully integrated public transport in the Greater Dublin Area (GDA).”

The proposed Metrolink project will be approximately 19Km in length running from the Estuary Park and Ride, north of Swords, southwards toward Dublin city via Dublin airport. It will start above ground from the Estuary through Swords and go underground through the airport, before emerging to cross over the M50. From Northwood, through to Charlemont in the south of the city, the proposed project will run through a single bore tunnel.

The proposed project will include up to 16 stations, a Park and Ride facility, a depot, and ancillary infrastructure. It is envisaged that at peak times the Metrolink will be capable of operating a train every 90 seconds carrying at least 20,000 passengers per hours per direction.

Some of the key deliverables of the proposed Metrolink project are to provide a transport service that will:

- Be modern, attractive and accessible to all users
- Be designed to integrate appropriately into the existing public realm
- Deliver a high-quality service with journey-time reliability along the corridor
- Support public transport network integration by providing high quality passenger interchange points which facilitate convenient transfer between public transport modes at key locations

The NDA acknowledges the breadth and depth of this Environmental Impact Assessment Scoping Report. However beyond referring to the fact that this proposed project will deliver a service that is accessible to all users, no details are provided as how the proposed Metrolink Project will enable more persons with disabilities and older people to access public transport services.

Persons with disabilities are mentioned in Chapter 5 of this report called Human Health. This chapter focuses on the impact this proposed project will have on the health of the 296,000 people living within 500 metres of this project in the area of Fingal County Council.¹ Out of this population 1.1% (3,256) reported that that they have very bad health while 30,192 (10.2%) of the population reported that they had a disability.²

¹ Census 2016

² Health Profile (2015)

According to the 2016 Census Dublin City has a population of just over 553,000³. 2% (11,060) of this population reported their health as being very bad, while 15% (82,950) reported that they had disability.⁴

However, beyond referencing the reported percentage of persons with disabilities in Fingal County Council and in Dublin City this chapter provides little evidence of any consideration being given as to how the construction of this proposed project will impact on the health and transport needs of persons with disabilities and older people. The NDA suggests that the TIL should consider this issue, in addition to examining alternative and accessible transport options that this cohort of the population could use while the proposed Metrolink is being constructed.

There is little evidence in the Environmental Impact Assessment Scoping Report that consideration has been given to developing and implementing a 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 therefore advises that TIL should develop and publish a strategy on the Metrolink's website detailing how TIL will ensure that this proposed project will meet the needs of persons with disabilities and older people. This statement should include how every aspect of their service including: the trains, location of stations, train routes, information on fares and timetables and audio visual announcements etc will be universally designed so that they are easy to access, easy to understand and easy to use by everyone. An important element of this strategy is that everyone, especially persons with disabilities and older people, are provided with accessible information on the processes they can use to ask questions and to make complaints, in addition to the contact details of the proposed service's Access Officer and the Complaints Officer.

The NDA also suggests that the phrase providing a service that is "accessible to all users" requires a clear definition.

Ireland's population is changing. In the 2016 Census, the overall number of people with disabilities has increased, comprising 13.5% of the total population compared to 13% in 2011. There are now 643,131 people with a disability living in Ireland.⁵

³ Census 2016

⁴ Health Profile (2015)

⁵ Census 2016

People are living longer, as can be seen in the changes in the population aged over 65 which has increased by 19.1% since 2011. Ireland's population is also growing older. According to the 2016 Census figures the number of people aged 66 has increased to 637,567 people (13.4% of the population).⁶

The NDA therefore strongly advises that if TIL is to deliver a public rail service that is **easy to access, easy to understand and easy to use for everyone, including persons with disabilities and older people**, then it will need to adopt and implement a **Universal Design approach** to developing and implementing the proposed Metrolink project.

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)

The importance of integrated universally designed public transport services that include the built environment and information and communication technologies is underpinned by **Article 9 of the UN Convention on the Rights of Persons with Disabilities**. Ireland ratified the UN Convention in 2018. Article 9 states that in order for persons with disabilities to live independently and fully participate in all aspects of life, they need to have access not only to accessible transportation but also to infrastructure, the built environment, information and communication processes and technologies and to other public facilities and services.

The report on **Accessibility of Public Transport for People with Disabilities** produced by the Joint Committee on Transport, Tourism and Sport in November 2018 also emphasised the necessity of having integrated universally designed public transport services that are accessible to everyone, especially persons with disabilities.

Integrated universally designed public transport systems are also perceived as being integral to the development and maintenance of inclusive and sustainable communities. The **2030 Agenda for Sustainable Development**, adopted by all United Nations Member States in 2015 identifies integrated universally

⁶ Census 2016

designed transport systems as core elements in creating healthy, sustainable and inclusive cities and communities.⁷

Section 6.3 of the **National Planning Framework for Project Ireland 2040** also identifies universally designed transport services, in addition to housing, education, and health services, as key areas that need to be developed to facilitate the development and progression of diverse and inclusive communities.⁸

The Transport Strategy for the Greater Dublin Area 2016 –2035 states that the provision of accessible public transport services is a key objective that will contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.

The importance of transport in the lives of persons with disabilities and the necessity for transport services that are accessible to everyone is also highlighted in **The Comprehensive Employment Strategy 2015 – 2024; National Disability Inclusion Strategy 2017 – 2021**.

Transport plays a crucial role in empowering people with disabilities to participate in everyday life and the activities of their communities. Approximately one in ten people with disabilities said that inadequate/inaccessible transport systems prevented them from participating in social events.⁹ About one in six people with a disability are not in work who would be interested in a job, cite transport or parking as an issue for them. Those with sight, mobility or intellectual disabilities are most likely to cite transport as an issue for employment.¹⁰

In this context therefore, the NDA advises that TIL should adopt and implement a Universal Design approach to the Environmental Impact Assessment Scoping Report for the proposed Metrolink project and for the overall project.

⁷ The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership.

⁸ Project 2040 is the Government's long-term strategy to make Ireland a better country for all of its people by investing in its public infrastructure.

⁹ National Disability Survey (2006) Vol. 2, Table 7.30

¹⁰ National Disability Survey (2006) Vol. 2, Table 7.30

Adopting and Implementing a Universal Design Approach

Adopting and implementing a Universal Design approach means examining and reviewing the following elements to determine if they are universally designed – that is easy to access, easy to understand and easy to use for everyone regardless of age, size, ability or disability:

- 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
- Systems that are available including information and communications technologies, audio visual announcements on public transport and at bus stations
- The design and location of train stations
- Timetables and information on fares at train stations, information and ticket kiosks and information on public transport service providers' websites
- Routes for train services
- Interior and exterior design of the trains.

The NDA therefore suggests that in the Environmental Impact Assessment Scoping Report, that TIL makes a clear commitment to implementing a Universal Design approach by including the following actions:

1. Having a sustained Engagement with a diverse set of users.
2. Developing and piloting an audit tool with a diverse set of users to assess if the proposed Metrolink project will provide integrated universally designed services that are easy to access, easy to understand and easy to use for everyone. This audit tool will incorporate the key criteria for providing universally designed services.

1. Sustained Engagement with a diverse set of users

In the Environmental Impact Assessment Scoping Report, TIL states that they will be having consultations events on different elements of the proposed project.

The NDA is aware that the consultation process is just one element of the development and implementation of this proposed project. The NDA therefore suggests that TIL should state that they will establish a process of sustained engagement with a diverse range of users, including persons with disabilities and older people, from the consultation process through to the final implementation of the proposed Metrolink project. It is essential that the experiences and

perspectives of persons with disabilities are a core feature of this project, as this will assist in the development and implementation of integrated public transport services that are accessible to everyone.

The NDA advises that the TIL can have effective, sustained engagement with a diverse range of users by:

- (i) Having a universal definition of the term Accessibility
- (ii) Extending the range of users

(i) Having a universal definition of the term Accessibility

Prior to engaging with a diverse range of users, it will be important to have a universal definition of the term Accessibility that will inform this engagement process.

The Environmental Impact Assessment Scoping Report does not contain a definition of accessibility. The NDA suggests that TIL needs to examine and evaluate how the entire proposed Metrolink project contributes to and fits in with the recommendations from the **2018 Accessibility of Public Transport for People with Disabilities** produced by the by the Joint Committee on Transport, Tourism and Sport. This report contained clear recommendations for the development and provision of integrated universally designed public transports services that are easy to access, easy to understand and easy to use for everyone regardless of age, size, ability, or disability.

As stated in the previous section, integrated universally designed public transports services are highlighted in a number of strategies including the **2030 Agenda for Sustainable Development**, adopted by all United Nations Member States and the **National Planning Framework for Project Ireland 2040**.

The NDA therefore advises that in terms of the Environmental Impact Assessment Scoping Report for the proposed Metrolink project that the TIL needs to use a more universal definition of Accessibility that dovetails with the definition of Universal Design as detailed under the Disability Act 2005. The NDA therefore suggests that TIL use the following definition of Accessibility as detailed in the **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:

“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”^{11 12 13}

This definition of accessibility matches the definition of Universal Design in that it includes products, services, and the built environment and its reference to “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 capabilities and preferences of persons with different disabilities.

The NDA advises that the reference to “products, systems, services, environments and facilities” also includes the following elements of a transport system: location of bus stops, vehicles, fares, routes, information on timetables fares and routes at bus stops and on the service providers’ websites, audio visual announcements, customer services, complaints services, local feeder services etc.

(ii) Extending the range of users

TIL can engage with persons with disabilities via the Department of Transport, Tourism and Sport’s Accessibility Consultative Committee and the user groups for the public transport service providers. The NTA, Dublin Bus, Iarnród Éireann and Bus Éireann also have persons with disabilities on their Boards.

In the context of implementing a universal design approach, the NDA advises that the in the Environmental Impact Assessment Scoping Report and in future assessments and plans for the proposed Metrolink project that TIL states that it will extend the range of users, particularly in terms of persons with disabilities and older people that it engages with. This process will assist TIL to ensure that all aspects of the Metrolink project are easy to access, easy to understand and easy to use and that they meet the needs of everyone regardless of age, size, ability or disability.

On 17 July 2018, the NDA and the NTA co-hosted a consultation event on the livery and design for the new fleet of Go Ahead buses. Go Ahead is a private operator that won the contract to provide 10% of the bus services in the Dublin area. This one event was attended by over 40 people. A diverse mix of persons

¹¹ ISO 26800, Ergonomics — General approach, principles and concepts

¹²ISO/TR 9241-100, Ergonomics of human-system interaction — Part 100: Introduction to standards related to software ergonomics

¹³ 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

with disabilities and older people, some of whom had never engaged with the NTA before this, participated in this event. This consultation had an impact, as it resulted in Go Ahead changing 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 NDA suggests that TIL could use this event as a model of good practice for extending the range of users they engage with.

In 2019, the Centre for Excellence in Universal Design at the NDA and the National Standards Authority Ireland developed a 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**. This standard 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 suggests that TIL may find this standard useful in helping them to engage in a sustained manner with a more diverse range of users.

The NDA also advises that it would be important for TIL 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 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. The NDA is happy to advise TIL on the most effective ways of reaching this cohort of people.

In the context of implementing the Universal Design approach, TIL will have to consider the design and location of train stations, the design of train routes, how information on timetables, fares and bus routes is communicated at train stations and on the Metrolink's websites, the operation of audio visual announcements, the quality of its customer services and complaints services, providing universally designed vehicles etc. TIL might find it useful to also extend its engagement to architects, urban planners, and IT professionals.

The NDA advises TIL that it should establish and consult with an advisory committee consisting of persons with different disabilities, older people, architects, urban planners, representatives from the local authorities and the NDA regarding the Environmental Impact Assessment and the future

development and implementation of the Metrolink Project. Incorporating this diverse level of expertise in this project from the outset will assist in the delivery of integrated universally designed public transport services that are easy to access, easy to understand and easy to use.

The NDA suggests that this advisory committee could meet on a monthly basis to monitor the progress that is being made on the Environmental Impact Assessment and the development of the proposed Metrolink Project to ensure that this project is providing a service that is easy to access, easy to understand and easy to use for everyone regardless of age, size, ability or disability.

2. Developing and Piloting an audit tool

The NDA suggests that in the Environmental Impact Assessment Scoping Report that TIL may wish to include an action to develop and pilot an audit tool with the proposed advisory committee to assess and ensure that all aspects of the proposed Metrolink project are universally designed.

Persons with disabilities and other members of the committee could user test a pilot of the Metrolink project via Mystery Shopping exercises and possibly virtual reality simulations of a pilot.

The NDA is already working with the NTA to develop two audits tools.

One audit tool is being developed to assess the roads and streets in Irish towns using a universally design approach.

The other audit tool that is being developed will be used to assess 12,000 bus stops throughout Ireland using a universal design approach.

The NDA would be happy to advise TIL on developing and piloting this audit tool.

The NDA advises that this audit tool would need to include the key criteria for the provision of universally designed public transport services. The NDA also advises that these criteria should also be applied to every aspect of the proposed Metrolink project.

The key criteria for the provision of universally designed public transport services are as follows:

(i) Accessible Information

Information on the proposed Metrolink project

The current information on the proposed Metrolink Project is very detailed. TIL should ensure that this information is provided in accessible formats including Plain English.

The NDA suggests that TIL could refer to 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/>

Information provided by Metrolink

TIL should also ensure that all the information provided by the proposed Metrolink project across written, verbal and digital media is available in different accessible formats. This information includes information on fares, timetables, bus routes etc.

Persons with disabilities need to access information to plan their end to end journey from beginning to the end. It is therefore crucial that Metrolink's website is universally designed and that it complies with the accessibility criteria laid out in the **EU Directive on Web Accessibility 2016/2102**. This Directive came into force in September 2018.

It is also important that processes for contacting relevant personnel such as an Access Officer to request information and a Complaints Officer to make complaints are in Plain English and are easy to find on the home page of the Metrolink website. The contact details for these Officers should also be on the website's homepage.

Any proposed mobile apps also need to be universally designed, in addition to information provided at train stations. It is important that audio visual announcements at trains stations and on the trains are fully operational and maintained.

(ii) Accessible Services

Built Environment

The design and location of train stations, lifts at the stations, pavements, access to and from train stations, the provision for drop off and departure points i.e. a car dropping off near a train station, or a taxi pulling out from a train station and the design and operation of ticket kiosks, etc are some of the key aspects of the built environment. TIL needs to ensure that the built environment for the proposed Metrolink project is universally designed. NDA produced a suite of guidance called **Building for Everyone** that provides comprehensive best practice

guidance on how to design, build and manage buildings and spaces so that they can be readily accessed and used by everyone, regardless of age, size ability or disability. This guidance is on the NDA's website at <http://universaldesign.ie/Built-Environment/Building-for-Everyone/>. The NDA welcomes the opportunity to work with and advise TIL on developing delivering universally designed buildings such as trains station and spaces for the proposed Metrolink project.

Unplanned Travel

The NDA is aware that one of the main barriers that person with disabilities experience when using public transport services is having to book travel 24 hours in advance to ensure that a staff member is there to provide them with any necessary assistance to get on and off bus and trains. This was one of the issues that was referenced in the **Accessibility of Public Transport for People with Disabilities** produced by the Joint Committee on Transport, Tourism and Sport in November 2018. The NDA has advised the Joint Committee, the NTA and public transport service providers that one solution to this issue is to have manned train stations. Each train station would have a trained staff member on hand to provide necessary assistance to persons with disabilities. It is essential that the audit tool and this overall project factors in the necessity of having trained staff at train stations to provide any necessary assistance to persons with disabilities to help them complete their journey.

In 2018, Iarnród Éireann launched the DART, Maynooth and Northern Commuter Accessibility Policy, to reduce the advance note persons with disabilities had to give to travel on rail services from 24 hours to 4 hours. Under this policy a new zonal system has been created that divides 31 stations along these routes into 13 zones, with each zone including between one to four stations. One station in each zone will always be manned (a Hub station) and will provide support to other stations in that zone (Non-Hub stations). TIL may wish to investigate this model of practice and consider piloting it for the proposed Metrolink project. Details of this policy are available at: <http://www.irishrail.ie/travel-information/access-dart-northern-commuter>

Intercoms

It is essential that all train stations in the proposed Metrolink project have universally designed intercoms so that all passengers, but especially passengers with disabilities can contact staff to obtain information and /or in case of an emergency. These intercoms should be large in size and colour contrasted so they are easy visible and recognisable for people with different disabilities, including persons with low vision and persons with intellectual disabilities. The instructions for using these intercoms should be in different accessible formats such as Plain English, and Easy to Read so that persons with intellectual disabilities

and persons with autism spectrum disorder can understand these instructions. Providing these instructions in large print will also enable persons with low vision to read these instructions. It is also important that these instructions are available in an audio format so that persons with sight loss can access instructions in how to use these services.

Intercoms should also have a text display option. When a staff member is responding to a question, a person with hearing loss will be able to read what the staff member is saying to them. It is important that intercoms and other facilities at each station are maintained in working order. The NDA's suite of guidance called **Building for Everyone** provides detailed information on universally designed intercoms that TIL could find useful.

Staff Training

Providing all staff, including management, who will be operating the proposed Metrolink service 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. The NDA has a free eLearning programme on disability equality and providing inclusive customer service that public transport staff may find useful. The eLearning programme can be accessed by following this link <http://nda.ie/Resources/eLearning/>

Designated Access and Complaints Officer

It is important that the proposed Metrolink project has a trained and designated Access Officer to promote and ensure the provision of universally designed services and to provide necessary supports for persons with disabilities. It is also important that the proposed Metrolink project has a designated Complaints Officer. This Officer should provide annual reports on the types of complaints they receive; the number and types of complaints they resolved; the number and types of complaints they did not resolve and the reasons why they were not resolved. TIL could compile and publish these reports as part of their Annual Reports.

Transfers

The Environmental Impact Assessment Scoping Report states that the proposed Metrolink project will:

“link Dublin Airport, Irish Rail, DART, Dublin Bus and Luas services, creating fully integrated public transport in the Greater Dublin Area”

One of the key deliverables of this projects is that it will support public transport network integration by providing high quality passenger interchange points which facilitate convenient transfer between public transport modes at key locations.

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 will 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 the rain
- 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 Metrolink 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 Metrolink 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 project links into other transport services in a way that is easy to access, easy to understand and easy to use. The proposed Metrolink project should be designed and delivered to function as part of a suite of integrated universally designed public transport service

Reviewing the Catchment Areas

The NDA also suggests that this advisory committee could assist the TIL in reviewing the catchment areas for proposed Metrolink project to determine if these areas have the capacity 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.

Cross Departmental Approach

The NDA suggests that a cross departmental approach involving the TIL, NTA, the NDA, public transport service providers, relevant Government Departments and related agencies will also be required to facilitate the effective development and implementation of the proposed Metrolink project.

Conclusion

The NDA is happy to meet with the TIL to discuss this submission. The NDA is looking forward to continuing to work with TIL to develop and implement integrated universally designed public transport services.