

East Wall Road – Interim two way cycle facility

**May 2022**

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

The NDA welcomes the opportunity to make a submission to the interim East Wall Road two way cycle facility proposed by Dublin City Council. Transport, including active travel, 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.[[1]](#footnote-1) 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.[[2]](#footnote-2) With the move towards policies, strategies and projects which promote active travel, it is important that the needs of people with disabilities are considered to ensure that changes to infrastructure and services are beneficial to all and will allow everyone to participate in active travel, regardless of age, size, ability or disability.

We note in the proposal that the interim cycle facilities will provide two-way segregated cycle facilities on each side of the road, on the eastern side of Alfie Byrne Road from the Eastpoint Causeway as far as East Wall Road and continuing along the northern side of Clontarf Road as far as East Wall Road. The NDA feels there are a number of points that need further consideration before finalising and progressing the new design.

# Universally Designed Consultation

We advise the importance of engaging and consulting with persons with disabilities and older people about this proposal, and that their views would inform the design of the island bus stop, the proposed narrowing of the footpath directly opposite the Church Road Junction, and the proposed new pedestrian and cycle crossing. We also note that as part of these works, new bollards are to be installed as part of a new school zone at St Joseph’s Primary School. It is very important that persons with disabilities, older people, children, and parents are informed of and consulted on the design of the new school zone.

We recommend consultations on all aspects of design are done prior to taking a decision to ensure that the interim road works are likely to serve everyone. In addition, persons with disabilities and older people should be consulted during implementation, to determine how the design is or isn’t meeting their needs, so that future designs can be improved. As this is an interim measure, consultation during implementation can help inform future phases of the project.

To better inform consultations, the NDA also recommends DCC conduct and produce a disability impact assessment on the proposed East Wall cycle track. A disability impact assessment involves a comprehensive examination of how this proposal impacts on a person with a disability so that fundamental issues are identified early, therefore informing any redesign and delivery of the proposal, to better meet the needs of persons with disabilities. As with consultations with people with disabilities, this assessment will also help to ensure the designs at the outset don’t require too many significant changes going forward. The Department for Justice provides guidance on how to conduct this assessment in their [Guidelines on How to Conduct a Disability Impact Assessment.[[3]](#footnote-3)](http://www.justice.ie/en/JELR/20120305%20DIA%20Guidelines.pdf/Files/20120305%20DIA%20Guidelines.pdf)

The NDA would recommend using the [Universal Design Customer Communications Toolkit](https://universaldesign.ie/products-services/customer-communications-toolkit-for-the-public-service-a-universal-design-approach/customer-communications-toolkit-for-the-public-services-a-universal-design-approach.pdf) as a key reference in designing and delivering information to the public concerning the proposed cycle track.[[4]](#footnote-4) Design features at the bus stop areas will not necessarily be familiar to both pedestrians and cyclists. Therefore as part of consultations with the public DCC should educate all users to understand the appropriate use of the cycle-path, crosswalks and bus stop design features. The NDA would like further information on how changes are being communicated to residents and through schools. This consultation and education process should be continuous, and should inform people following design changes as well, providing demonstrations around the changes and how to use new junctions and crossings etc.

# Infrastructure Considerations

With regards to on-track cycle markings to alert cyclists to yield for upcoming crosswalks and the use of markings at crosswalks we strongly recommend the use of zebra marking at crosswalks as used in [CYCLOPS, Manchester](http://www.jctconsultancy.co.uk/Symposium/Symposium2018/PapersForDownload/CYCLOPS%20Creating%20Protected%20Junctions%20-%20Richard%20Butler%20Jonathan%20Salter%20Dave%20Stevens%20TFGM.pdf)[[5]](#footnote-5) and [Getting to the Curb, San Francisco](https://walksf.org/wp-content/uploads/2019/12/getting-to-the-curb-report-final-walk-sf-2019.pdf)[[6]](#footnote-6).

DCC should also consider design guidance in [CYCLOPS, Manchester](http://www.jctconsultancy.co.uk/Symposium/Symposium2018/PapersForDownload/CYCLOPS%20Creating%20Protected%20Junctions%20-%20Richard%20Butler%20Jonathan%20Salter%20Dave%20Stevens%20TFGM.pdf) on page 7 which provides Guiding Principles for Protected Junctions regarding where there might be some junctions where traffic lights for cyclists would be necessary.

In designing cycle tracks DCC should also consider a wider range of user types and cycle types from the [Inclusive Cycling Guide](https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf)[[7]](#footnote-7). Consideration should be given to cyclists who are disabled as well as non-disabled users who use non-standard cycles to ensure that the cycle way and the bus stop crossing are suitable for them. This will require consultation with disabled cyclists, people who use cargo bikes/bike trailers, and others about the proposed works.

Consulting with a diverse range of users is a key principle of **Article 4 of the UN Convention on the Rights of Persons with Disabilities (UNCPRD)**. Consultation with persons with disabilities is best done directly with persons with disabilities and their representative organisations, and the NDA advises that this would be through Disabled Persons Organisations (DPOs) or individuals, rather than solely umbrella bodies (although these also have valuable perspectives). All information regarding this proposal should be accessible to persons with disabilities and available in alternative formats to meet the needs and preferences of individuals.

# Conclusion

On a final note, **Article 9 of the UN Convention on the Rights of Persons,** 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. As this development will have a significant impact on new and existing infrastructure such as footpaths and bus stops but also on cycle tracks and associated links to transport (either through active travel or public transport) this project has significant impacts to persons with disabilities, particularly in relation to travel and transport. DCC should consider the impacts this project will have on the rights of persons with disabilities, particularly in reference to Article 9.

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

1. National Disability Survey (2006) Vol. 2, Table 7.30 [↑](#footnote-ref-1)
2. National Disability Survey (2006) Vol. 2, Table 7.30 [↑](#footnote-ref-2)
3. http://www.justice.ie/en/JELR/20120305%20DIA%20Guidelines.pdf/Files/20120305%20DIA%20Guidelines.pdf [↑](#footnote-ref-3)
4. http://universaldesign.ie/products-services/customer-communications-toolkit-for-the-public-service-a-universal-design-approach/ [↑](#footnote-ref-4)
5. http://www.jctconsultancy.co.uk/Symposium/Symposium2018/PapersForDownload/CYCLOPS%20Creating%20Protected%20Junctions%20-%20Richard%20Butler%20Jonathan%20Salter%20Dave%20Stevens%20TFGM.pdf [↑](#footnote-ref-5)
6. https://walksf.org/wp-content/uploads/2019/12/getting-to-the-curb-report-final-walk-sf-2019.pdf [↑](#footnote-ref-6)
7. https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/06/FINAL.pdf [↑](#footnote-ref-7)