

Submission: NTA Draft Waterford Metropolitan Area Transport Strategy

**July 2022**

# 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 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.

# Transport Strategy for the Waterford Metropolitan Area

The NDA is pleased to see from the current draft Transport Strategy for the Waterford Metropolitan Area that the NTA is committed to implementing a universal design approach and recognises universal design as a key support measure to delivering this strategy. The NDA notes that in the draft strategy transport options and network development document, the walkability audit tool is highlighted as a useful tool. The NDA is encouraged to see this being considered as part of this strategy and would encourage use along proposed routes to determine key areas of improvement in order to help the NTA with the key walking measures detailed in the document; Steady state maintenance of footpaths, Improved footpaths, Improved junctions, Crossing times, Crossing Points, Accessibility for All, Local Amenity Routes, Wayfinding and Permeability.

The NDA would encourage the NTA to continue with the universal design approach laid out in the draft strategy and NDA is happy to provide information and advice to the NTA concerning engagement with people with disabilities and Disabled Persons Organisations (DPOs). In this submission we will provide some information to further assist the NTA with this approach. The NDA is also available for questions, meetings or workshops on this topic.

# Universally Designed Consultation

One area of universal design we wish to highlight is the importance of universally designed consultation, which is central to ensuring services are universally designed.

The NDA is aware that two public forum events are planned in Waterford. The NDA wishes to point out that this format for engagement may not be accessible to everyone and we were unable to find information on the website as to how people interested in attending the consultation might be able to access the consultative event who may have a visual impairment, be a wheelchair user or a person requesting ISL interpretation. It would be good practice to provide contact information which would facilitate both written and spoken queries about accessibility and requests for accommodations. In addition, online consultations or information sessions with mechanisms for providing feedback provided may allow those who are unable to travel and/or access the building or who might want to have captioning easily available should be considered in order to ensure the widest possible audience.

One key element to universally designed consultation is provision of accessible information- this allows as wide a range of people as possible have the information they need in order to form and communicate their opinions about projects, policy, infrastructure changes which affect them, The NDA wishes to point out that while easy to read and accessible PDF formats of the draft strategy were published???, no contact details were provided as to how people could request alternative formats of other documents associated with the draft strategy or other formats which might help. As detailed in the [Code of Practice on Accessibility of Public Services and Information provided by public bodies](https://nda.ie/Good-practice/Codes-of-Practice/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies-/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies.pdf), public bodies should have procedures in place for processing requests for accessible formats.

The NDA strongly recommends facilitating a sustained engagement process with a diverse set of users including persons with disabilities and older people, from the consultation process through to the final implementation by establishing and consulting with an advisory committee that includes Disabled Persons Organisations (DPOs), persons with different disabilities [[1]](#footnote-1) and older people from the Waterford Metropolitan area, architects, urban planners, IT professionals, representatives from the local authorities and the NDA. This diverse level of expertise will help the NTA to address the impact that the transport strategy will have on the transport services, the transport network, the built environment, public spaces etc.

The NDA wishes to highlight the following further considerations with regards to universally designed consultations:

* The NDA advises that the NTA ensures they facilitate an inclusive and accessible consultation process on the transport strategy for the Waterford Metropolitan area so that a diverse range of users, including persons with different disabilities can participate.
* With the above in mind, we would like to remind you of the Irish Sign Language Act 2017 which places an obligation on public bodies to ensure interpretation is arranged for persons who cannot hear and wish to access their statutory entitlements. The availability of ISL interpretation upon request should be publicised.
* In order to ensure this project delivers a transport network which is user-friendly and accessible for all, the NDA suggests that future consultations and planning stages include an action to ensure that a wide range of the public, including people with disabilities and older people are engaged at every step of the process. We would also suggest it may be particularly useful 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 no use public transport. Good communication needs to be in both directions, that consultation includes advising the public on how their input and feedback has been considered, used and applied. This can help the public feel more included in the process and can diminish feelings that their input has not been recognised.
* In conducting consultations the NDA recommends the NTA incorporate a ‘whole journey’ approach to examination of this strategy. This approach consists of examination of eight stages; pre-journey planning, journey start to end (including travel to and from transport stops), the public transport stop/stations, interchanges, return journey planner, disruptions to service (planned and unplanned), and supporting infrastructure (such as wayfinding, seating, and toilets)[[2]](#footnote-2). The universal design walkability audit tool would be useful in adopting this approach.[[3]](#footnote-3)
* The NDA suggests the NTA may find the 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** may be useful in this regard. This standard was developed with support from 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 organisation 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. This standard is available on [standards.ie](https://shop.standards.ie/).
* In communications the NDA suggests thattheNTA should usethe[**Customer Communications Toolkit for the Public Service - A Universal Design Approach**](http://universaldesign.ie/Products-Services/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. The 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](https://www.nala.ie/news/winners-plain-english-awards-announced), in the category, Best use of plain English by an organisation.

The NDA also notes that as part of the BusConnects project associated with this transport strategy new transport routes as well as redesign of branding and livery is suggested. The NDA would stress that changes to bus routes should be designed with ample input from persons with disabilities and older people and that any changes to branding and livery will need to be easily understood and should not present further barriers to accessibility. 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 in the Dublin area. This one event was attended by over 40 people. A diverse mix of persons 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 in subsequent revisions to the initial design, which resulted in the buses being more visible and recognisable to persons with visual impairments, persons with intellectual disabilities, persons with autism spectrum disorder, older people, visitors and tourists. The NDA suggests that the NTA could use this event as a model of good practice for extending the range of users they engage with going forward with this project. The NDA would be happy to provide additional background and assistance with running a similar workshop with regards to the new BusConnects network, as well as associated redesign and information.

# Delivering Universally Designed transport services

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.[[4]](#footnote-4) People are also living longer, according to the 2016 Census figures, 15% of the population in Waterford is aged 65 and over, and overall in Ireland the population aged 65 and over has increased to 637,567 people (13.4% of the population).[[5]](#footnote-5) It is therefore vital in order to ensure that public transport delivered serves all of the public and will continue to provide functional and fit for purpose services into the future that a universal design approach is taken to the designing public transport services.

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.

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**,](https://sustainabledevelopment.un.org/post2015/transformingourworld) adopted by all United Nations Member States in 2015 identifies integrated universally designed transport systems as core elements in creating healthy, sustainable and inclusive cities and communities.[[6]](#footnote-6)

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. [[7]](#footnote-7)

Additionally, the NTA has a responsibility under Action 3 of the **OPS 2020: Make Services More Accessible to All**[[8]](#footnote-8) which states that all public services should be easily accessible by all members of the public, including those with diverse needs regardless of language, culture, literacy or ability and also migrants and people in vulnerable situations.

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**.

The NDA is pleased to see that the NTA is mindful of its commitment to the strategies mentioned above, the UNCRPD and the OPS. However, it is important that the stated intention in this draft strategy is enacted on a practical level. As such it is vital the NTA properly assesses the impact of this project for persons with disabilities and employing a universal design approach to ensure positive design of the transport network and infrastructure. Such an assessment can be teased out through the approaches advised below:

* There is no evidence in documentation provided that a Disability Impact Assessment has been undertaken as part of this project. For reference, the Department of Justice provides Guidelines on **How to Conduct a Disability Impact Assessment.[[9]](#footnote-9)** We want to make clear that there is an obligatory requirement to conduct a Disability Impact Assessment of all substantive proposals as stipulated in [The Cabinet Handbook](https://assets.gov.ie/6813/2a580791a7b24decb97a550539a0faff.pdf)[[10]](#footnote-10).
* In progressing with this strategy, the design and procurement of certain products and services must comply with **EU Directive 2019/882 on the accessibility requirements for procurement of products and services and in particular** for information and communications technology to be accessible for people with disabilities (harmonised standard EN 301 549). We also recommend that for all stops and stations you consult the European Standard **EN 17210:2021: Accessibility and usability of the built environment** which details functional requirements for bus and coach stops.
* In addition to standard EN 301 549 regarding information and communications technology we also wish to stress the requirements of public bodies under the [Web Accessibility Directive](https://www.irishstatutebook.ie/eli/2020/si/358/made/en/print) which requires public bodies in Ireland to ensure their websites and mobile apps are accessible to all people, including persons with disabilities. This would include proposed real time passenger information and wayfinding updates as detailed in this draft strategy.

# Active Travel Considerations

* It is noted that active travel forms a central part of this draft strategy. The NDA would stress that as part of this strategy pedestrian crossings are designed with accessibility in mind and that pedestrian crossings are controlled and include traffic calming measures which protect pedestrians not just from vehicles but also from cyclists.
* 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)[[11]](#footnote-11) 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)[[12]](#footnote-12).
* The NTA 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.
* The NDA is pleased to see an acknowledgement of the need to design cycle tracks for non-standard cycle users. In designing inclusive cycle tracks the NTA might find the [Inclusive Cycling Guide](https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf)[[13]](#footnote-13) useful. 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. It may also be of use to consult the [London Cycling Design Standards](https://bicycleinfrastructuremanuals.com/manuals1/London%20Cycling%20Design%20Standards%202016_UK%20London.pdf) which details some kinds of adapted cycles and provides guidance on designing cycle tracks which will accommodate a range of cycles. Of the utmost importance in this regard is consultation with a wide range of cyclists, in particular with disabled cyclists, older cyclists, people who use cargo bikes/bike trailers, as well as with a wide range of pedestrians about any proposed cycle track upgrades.
* The NDA notes that in the draft strategy it is stated that there should generally be no car parking requirement for new developments in or near the centres of the five cities and a significantly reduced requirements in the inner suburbs. The NDA would stress that spaces for car users with disabilities close to amenities/walking routes/ town centres are necessary to ensure that active travel options are accessible for all and would strongly recommend parking provision for car users with disabilities be protected and even expanded depending on need. Information on the provision, dimensions and accessibility of spaces for car users with disabilities can be found in CEUD’s guide [Building for everyone: A Universal Design Approach –External environment and approach](https://universaldesign.ie/Built-Environment/Building-for-Everyone/1-External-Environment.pdf)

# Conclusion

The NDA can provide further information and background with regards to the above and is happy to meet with the NTA to discuss ensuring a Universal Design approach in greater detail. The NDA is looking forward to continuing to work with the NTA to develop and implement integrated universally designed public transport services.

1. As detailed in “Ask me: Guidelines for Effective Consultation with People with Disabilities” (<http://nda.ie/nda-files/-ask-me-guidelines-for-effective-consultation-with-people-with-disabilities1.pdf>) **one** route to reaching this group would be through representative organisations representing persons with disabilities and their families. These guidelines are currently being revised. The NDA is happy to provide further guidance on this going forward. [↑](#footnote-ref-1)
2. <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/transport-accessibility/whole-journey-guide/guide> [↑](#footnote-ref-2)
3. [Universal Design Walkability Audit (nationaltransport.ie)](https://www.nationaltransport.ie/wp-content/uploads/2021/01/Universal-Design-Walkability-Audit-Tool-V1.pdf) [↑](#footnote-ref-3)
4. Census 2016 [↑](#footnote-ref-4)
5. Census 2016 [↑](#footnote-ref-5)
6. [The 2030 Agenda for Sustainable Development,](https://sustainabledevelopment.un.org/post2015/transformingourworld) 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. [↑](#footnote-ref-6)
7. Scheme 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. [↑](#footnote-ref-7)
8. <https://www.ops2020.gov.ie/app/themes/ops2020/dist/pdfs/Our-Public-Service-2020-WEB.pdf> [↑](#footnote-ref-8)
9. https://www.justice.ie/en/JELR/20120305%20DIA%20Guidelines.pdf/Files/20120305%20DIA%20Guidelines.pdf [↑](#footnote-ref-9)
10. https://www.gov.ie/en/publication/05c2e2-cabinet-handbook/ [↑](#footnote-ref-10)
11. http://www.jctconsultancy.co.uk/Symposium/Symposium2018/PapersForDownload/CYCLOPS%20Creating%20Protected%20Junctions%20-%20Richard%20Butler%20Jonathan%20Salter%20Dave%20Stevens%20TFGM.pdf [↑](#footnote-ref-11)
12. https://walksf.org/wp-content/uploads/2019/12/getting-to-the-curb-report-final-walk-sf-2019.pdf [↑](#footnote-ref-12)
13. https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/06/FINAL.pdf [↑](#footnote-ref-13)