



Independent Living Movement Ireland submission in relation to “Enabling the City to Return to Work Interim Mobility Intervention Programme for Dublin City”.

Independent Living Movement Ireland (ILMI) is a campaigning, national representative organisation that promotes the philosophy of independent living and seeks to build an inclusive society. Central to the way we work is to ensure that policy decisions that impact on the lives of disabled people have to be directly influenced by those whose lives are directly affected. Our philosophy can be summed up as: ‘Nothing about us without us!’ and ‘Rights Not Charity’. Our vision is an Ireland where disabled persons have freedom, choice and control over all aspects of their lives and can fully participate in an inclusive society.

Covid-19 has changed the world we live in and the requirements for social distancing as a public health measure will be something that everyone must observe for the foreseeable future. As outlined in the [“Enabling the City to Return to Work Interim Mobility Intervention Programme for Dublin City”](#) there is concern regarding how people will be able to travel and move around the city. However, we as a Disabled Person’s Organisation (DPO) feel there is a huge concern regarding how disabled people will be impacted in everyday life and travel around Dublin City.

We understand that to safely meet social distancing requirements, a number of changes have been made where additional space for pedestrians is needed. However, this plan must be inclusive and positively impact on disabled people’s lives. The report states that this is a temporary emergency programme and there has not been time to formally consult with people prior to this report. However, as per the UNCRPD there are specific articles (4.3 and 29b) that relate to the role of Disabled Person’s Organisations (DPOs) and to engagement and consultation with disabled people.

ILMI recognises that the Covid19 pandemic necessitates rapid temporary changes in order to facilitate people returning to work whilst maintaining social distancing and to promote, where possible, safe, sustainable pathways for people to access Dublin City. ILMI welcomes the commitment that “the proposals will not diminish or reduce any of the accessibility arrangements already in place” and the commitment to dialogue as part of the implementation stage “to facilitate more focused input in relation to accessibility issues into individual proposals”, which will be needed to ensure that any well-intended measures do not pose risks to disabled pedestrians or reduce access or inclusion for disabled people in Dublin City.

Specific concerns that ILMI have in relation to *Enabling the City to Return to Work Interim Mobility Intervention Programme for Dublin City*" are as follows:

1. Proposed Changes to Bus Stops to Facilitate Social Distancing:

- **Top of the Queue:** In queuing for buses, priority needs to be given to disabled passengers queuing. Ideally a space should be defined at the top of every queue for wheelchairs, insisting that priority of space allocation inside the bus is given to the wheelchair user if not already occupied by another wheelchair user. Queuing for buses is going to be difficult for disabled people who need assistance from their Personal Assistant to travel independently.
- Few disabled people will be able to climb to the top deck of a bus, and the same goes for elderly people. As distancing disappears, a normality of assistance and priority should return but the wheelchair user must retain that priority queuing slot at the bus stop.
- **Reduced Bus Stops:** Passengers required, in some instances, to walk further to bus stops is problematic for disabled people, wheelchair users, those without Personal assistance and may cause disorientation to those with visual and sensory impairment. The reduction in the number of buses stopping at specific stops will cause unease and make it difficult for disabled people to access the bus unless priority boarding is practiced. Specific consideration needs to be given to how Dublin Bus and DCC propose to engage with disabled passengers on how to manage any proposed changes.
- **50m Reasonable Distance:** Given the increased distances now to be imposed from bus stop to destination on arrival, all of these changes must permit for taxi drop and pick up access within 50 metres of restaurants, hotels and places of entertainment. Dublin is a damp wet city for a disabled person to negotiate on foot beyond what might be considered to be a reasonable distance and 50 metres is what might be perceived as reasonable. Taxi admission to otherwise "pedestrianised streets", should be at "crawl speeds" so as not to overly interfere with increased pedestrianisation.

2. Proposed Outdoor Areas May be Interfere with Accessibility

- ILMI recognises that some streets will be able to accommodate outdoor areas and public health measures and that no decision can be a "one size fits all." Proposals to allow businesses to open by facilitating outdoor areas cannot undo decades of campaigning to make streets in Dublin accessible, inclusive, and safe for disabled people. Any proposals must meet strict public health guidelines, but at the same time, not encroach on spaces to limit access to the streets of Dublin for disabled people.

- “**Distancing queuing**” outside of shops is a chaotic imposition which is not disability-friendly and cannot be made so.
- If temporary outdoor spaces demonstrate that they will not limit access or encroach on the two metre rule, it will be vital that the perimeters have agreed fixed canvas screening to clearly and safely delineate an outdoor space from a pedestrian space to ensure the outdoor space does not organically “spill over” into the street or make it impossible for disabled people to safely navigate around it.
- **Sandwich Boards:** Disabled people do not want to see the return of pavement sandwich boards. Any external presence of a premises on the street has to be safely fenced off and only as a temporary measure.

3. Proposed Mobility Measures

- **No Safe “Shared Space” for Pedestrians and Cyclists:** ILMI recognises that many people will prefer for safety reasons not to use public transport for the immediate future and that in order that traffic is managed that priority will be given to pedestrians and cyclists. Whilst increasing the numbers of pedestrians and cyclists is a welcome measure, we need to recognise that the needs of pedestrians and cyclists are not the same. There is no such thing as a safe “shared space” for pedestrians and cyclists. On that basis, there will need to be defined margins where there are pedestrian areas and cycle paths to ensure safe crossing.
- Every pedestrianised street should not be given a complementary cycle track. Cycle tracks should be provided on main routes and an agreed number of crossing and linking streets only.
- Cycle tracks should not be permitted between a regular pavement and a bus stop. This provision is unsafe for the travelling pedestrian and the cyclist.
- **Accessible Parking Spaces:** Accessible parking spaces, in parallel parking, should be so arranged that the driver’s side is always immediately adjacent to the pavement. Like the foregoing item on bus stops, to have a cycle track exist between the parking space and pavement would be an unsafe provision.
- **Accessible Communications:** It is positive to see that all information in relation to the programme will be up-to-date, accessible and coherent and that multiple communication methods and channels will be established and used to disseminate information such as images, maps and videos, regular Councillor briefings, a dedicated public webpage, social media platforms and dissemination of flyers and a dedicated email address.
- **Cyclist Parking Facilities:** Measures to increase the number of cyclists using the roads in Dublin City need similar investment into parking facilities for cyclists. With the provision of adequate bicycle parking spaces which do not impact on the built environment for disabled people, unattended bicycles should not be left attached to

poles or proposed barriers around street dining areas creating further obstacles for disabled people.