**Blind Legal Alliance/Robbie Sinnott Submission June 30th 2019**

The below are observations on the Liffey Cycle Route made by myself,
Robbie Sinnott in a personal capacity and, on behalf of the Blind
Legal Alliance (BLA). (1) deals with basic discrimination in terms of
consultation, as well as with other legal obligations and commitments
which DCC appears to be ignoring; (2) deals with “shared facilities”
between pedestrians and cyclists; (3) deals with island bus-stops; and
(4) deals with ambiguous junctions.

1.  DCC’s Shortcomings Regarding Legal Obligations in Accessible
Documentation and Statutory Consultation.

DCC’s website needs to be WCAG 2.0 AAA compliant (EU Directive
2016/2102), and this is not currently the case.

Up-to-date versions of the proposals have not been made available
(e.g., those shown by the planners on a meeting on June 17th).  Such
documentation was inaccessible, also, at the time, for people like
ourselves with a severe visual impairment.

Details of curb-height, flat-faced vs. shamfered curbs, height of
curbs, and space-sharing between bicycles and pedestrians still ahs
not been adequately provided in a format accessible to screen-reading
technology.

2. Shared Facilities Between Pedestrians and Cyclists:
Explicit shared facilities appear to be proposed for pedestrians and
cyclists at Wolfe Tone Quay (at the junction of Frank Sherwin Bridge);
at Eden Quay (after Rosie Hackett Bridge, including)…also at City Quay
near Lombard Street junction.

Blind people can’t see bikes coming, and find it difficult to hear
them too.  Thankfully, the National Cycle Manual agrees with us, and
specifically mentions us in this respect (i.e., contradicting this
proposal):

NCM 1.9 – ‘shared facilities between pedestrians and cyclists are
generally not desirable’.
1.9.2 …legibility: ’both modes [cyclists and pedestrians] should be
segregated whenever possible’; homogeneity: ‘pedestrians should always
have priority and signage should reinforce this. Cycling speeds should
be reduced to allow for sudden stopping if necessary; Forgivingness:
…an alternative route or segregation is preferable.
1.9.3: ‘shared facilities should be avoided in urban areas as far as possible’.

Only in rare circumstances are such shared facilities unavoidable, and
where this is the case, eight mitigating measures for the protection
of pedestrians are given in NCM 1.9.3.

3. Island Bus-Stops:
Island bus-stops appear to be proposed at least at Wolfe Tone Quay
(close to Liffey Street West); Arran Quay (at Ocean House); Inns Quay
(in front of Four Courts); Merchant’s Quay; Usher’s Quay; Usher’s
Island; beside the Diving Bell on the North Docks, and another on
North Wall Quay and Sir John Rodgerson’s Quay.

We cannot express enough our deep concerns at this ignorance.  Again,
blind passengers going to or from a bus-stop cannot see a cyclist
coming.

Again, the NCM agrees with us, and not with the proposal: NCM 5.1.2
needs of mobility impaired must be taken into account when designing
bus-stops.

4. Cycle-Through Bus-Stops:
Several bus-stops appear to have a cycle-track between the
let-off/pick-up point and the pavement.  Like the island bus-stops,
this is highly dangerous for pedestrians and as such, is not
acceptable.  Nor is it conducive to the stated principle of the Dublin
City Development Plan that pedestrians get priority in planning
matters.

5.  Ambiguities of Space:
Pedestrian crossing ambiguities appear to be proposed at least at City
Quay and Victoria Quay (Frank Sherwin Bridge and entrance to Heuston
Station); at East Link Bridge junctions.  This is complacent (i.e.,
sloppy) planning.

6.  The dangers we now point out regarding cyclists vs. pedestrians
will be magnified when eMobile vehicles are introduced.

7.  As per the Guide Dogs UK report of 2009 and 2012, all stepped
curbs which segregate pedestrians from other vehicles (including
cyclists) need to be a minimum of 60mm and be flat-facing.  Since
DMURS says that anything below 100m is a trip-hazzard, we’re happy for
the minimum height of these curbs to be 100m+.  Your eagerness to
protect cyclists from cars etc. with a curb-height of 125mm is shared
by us vulnerable pedestrians, but needing from the cyclists.

8.  Boardwalks should be of good finish – non-stick and non-grip, and
non-snagging for white canes.

Regards,

Robbie Sinnott
1 of BLA

Clearly marked and well-understood (+ consistent)

5.2 segregation
5.4 cyclists
5.6 pedestrians
5.9 optimise the quality of service for cyclists
Two-styole pedestrians – audio?
ADTs for cyclists for cyclist safety