**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