Senior Executive Officer

Forward Panning Section

Land Use Planning & Transportation Department

County Hall

Tallaght

Dublin 24

26th April 2022

**Re: Amendments to Draft South Dublin County Development Plan Public Consultation**

As previously advised by the Department of Transport on 28th August 2021, since the previous development plan was published there have been important policy developments which are relevant to accessible, integrated and sustainable public transport. The Department of Transport (DoT) considers these should be reflected in the proposed Plan.

1. **Accessible public transport for All, and especially for Persons with Disabilities, Reduced mobility and Older People**

* the “whole of Government” **National Disability Inclusion Strategy (NDIS) 2017-2022** includes specific actions assigned to local authorities. For example, action 108 relates to the ‘dishing’ of footpaths and action 109 relates to accessible infrastructure, including bus stops. Lack of dishing is often cited as a major concern for wheelchair users. DoT welcomes the text. ‘to ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained on the National Disability Inclusion Strategy (NDIS) 2017-2022 in SM2 objective 16, Chapter 7.5.4 Active Travel and Schools, page 257, Amendment 8.
* the **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD**) ratified by Ireland in 2018. The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas. The DoT requests that this material on the UNCRPD, be included in the development plan.
* the **DMURS Interim Advice Note – Covid-19 Pandemic Response** published in 2020. It includes guidance that designers should ensure that
  + measures align with the principles of universal design,
  + consider Government policy on accessibility for people with disabilities and
  + consult people with disabilities to further appraise measures.
* References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note Covid-19 Pandemic Response. DoT requests that section on ‘Design Manual for Urban Roads and Streets (page 244 of Chapter 7, Sustainable Movement) be updated.
* To make public transport fully accessible to people with disabilities requires a **‘whole journey approach**’. This refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment’. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters. The DoT requests that this material be included in the development plan.

The Department of Transport notes the proposed material amendment to SM3 Objective 7 to include the wording “*the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin Southwest*”. It should be noted that there is no funding available under the National Development Plan 2021-2030 for such a proposal.

*Reform, Central Policy and Communications Division*

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**An Roinn Iompair**

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