

Member State Ireland

National Implementation Plan
for
Technical Specification for Interoperability
relating to accessibility of the Union's rail system
for
persons with disabilities and
persons with reduced mobility (PRM)

December 2017

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1. Context

1.1. Setting the scene (facts and figures — social data — evolution of mobility needs and mobility impairments)

This is Ireland's initial National Implementation Plan (NIP) for the Technical Specification for Interoperability (TSI) relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility (PRM). This fulfils the following legal requirement -

Article 8(1): Member States shall adopt national implementation plans, including at least the information listed in Appendix C of the Annex, with a view to progressively eliminating all identified barriers to accessibility. [EU Regulation 1300 of 2014]

Article 8(2): The national implementation plans shall be based on existing national plans and, subject to availability, on the inventory of assets referred to in Article 7, or on any other relevant and reliable source of information. The scope and speed of implementing national plans shall be decided by Member States. [EU Regulation 1300 of 2014]

The target population is defined within the TSI PRM, point 2.2:

'Person with disabilities and person with reduced mobility' means any person who has a permanent or temporary physical, mental, intellectual or sensory impairment which, in interaction with various barriers, may hinder their full and effective use of transport on an equal basis with other passengers or whose mobility when using transport is reduced due to age.

A similar definition of the target population is contained in the Department of Transport's Sectoral Plan:

"people with reduced mobility" means people with physical, sensory, learning or cognitive difficulties (whether permanent or temporary) and others whose access to traditionally constructed transport vehicles, services and infrastructures is limited, to a greater or lesser extent, on account of age, because of accompanying children or because they are carrying luggage or shopping or are otherwise impaired in their use of the transport system.

The Central Statistics Office's national census reports that in 2016, one person in eight of the national population in Ireland had a disability. It also reports that in 2011, rail mode share as a means for travel to work stood at 3.1%, increasing to 3.4% in 2016 against the background of a 9.3% increase in commuters. About 3 million persons commute to work or study each day.

The concept of "Transport for All" is now generally accepted within the EU and by the European Council of Ministers for Transport (ECMT). The Department of Transport, Tourism and Sport (DTTAS) has embraced this concept and it is at centre of its national 'Smarter Travel' approach. Such a concept includes the broader population and not just people with disabilities.

The National Transport Authority (NTA) has also published a comprehensive Greater Dublin Area Draft Transport Strategy 2011-2030 (2030 vision), which is underpinned by Regional Planning Guidelines.

1.2. Legislative background

United Nations

The UN Convention on the Rights of Persons with a Disability (UNCRPD) is relevant to public transport services, in particular Articles 9 and 20.

European Union

Chapter V of Regulation (EC) No 1371 of 2007 on rail passenger's rights and obligations applies, although Ireland has a national exemption from Articles 13, 15, 21 and 23 until 4th December 2019, with possible extension until 4th December 2024. Ireland is currently participating in the negotiation of the EU proposal for a recast Regulation on rail passenger's rights and obligations [Com (2017) 548 final 2017/0237 (COM)] and will take cognisance, as necessary, of the provisions that emerge in due course from this act on accessibility to rail services for passengers with reduced mobility and any tie-in with TSI-PRM national implementation measures.

Ireland is also currently participating in the negotiation of a separate EU proposal for a Directive on the approximation of the laws, regulations and administrative provisions of the Member States as regards the accessibility requirements for products and services [Com/2015/0615 final (2015/0278) (COD)] and will take cognisance, as necessary, of the provisions that emerge in due course from this act on accessibility to rail services for passengers with reduced mobility and any tie-in with TSI-PRM national implementation measures.

National legislation and policy

The rights of disabled persons are also referred to in national legislation, the Equality Act 2010. Under the Disability Act 2005, where a service is provided to or by a public body, the head of the public body concerned is required to ensure where practicable that the service is accessible to persons with disabilities, and that the provision of access to the service by persons with and without disabilities is integrated.

Under the Disability Act 2005, the Minister for Transport, Tourism and Sport (the Minister) must produce a sectoral plan which must contain information concerning public transport services, including a programme of projected measures for the provision of access to persons with disabilities. This sectoral plan must contain measures to be taken by the Minister and the Minister for Housing and Planning for the purpose of facilitating access by persons with disabilities, and the time within which such measures are to be taken.

The sectoral plan titled '*Transport Access for All – 2012 edition*' was published in by the DTTAS in 2013. The next edition of the Transport Sectoral plan is under preparation in 2017, stakeholder consultation is being undertaken and it is expected that the new '*Transport Access for All*' plan will be published in 2018/19.

National Disability Inclusion Strategy 2017-2021

National Disability Inclusion Strategy 2017-2021, published in 2017, is a whole of Government approach to improving the lives of people with disabilities both in a practical sense, and also in creating the best possible opportunities for people with disabilities to fulfil their potential. The previous National Disability Strategy ran from 2013 to 2015 when challenging economic and fiscal conditions applied, which frustrated implementation. In 2016, in the development of the strategy, the Department of Justice and Equality, together with the National Disability Authority and the National Disability Strategy Implementation Group undertook a consultation process with a view to putting in place a new national Disability Inclusion Strategy. The process provided interested parties with the opportunity to make recommendations in key areas such as service provision, accommodation, health, employment, transport and education.

Rail passenger travel comes within the ambit of actions that are identified for implementation under the aegis of DTTAS in relation to transport service provisions. DTTAS will take cognisance, as necessary, of the implementation obligations that arise in relation to accessibility to rail services for passengers with reduced mobility and of any tie-in with TSI-PRM national implementation measures. The voice of people with disabilities will continue to be heard throughout the monitoring and implementation process of the *National Disability Inclusion Strategy 2017-2021*. Since the Strategy is a live document their continued input will be sought and recorded on an on-going basis. A midterm review and consultation meetings where each department (national ministry) concerned will report on their commitments will also form a key part of the implementation process. An annual report will be published on progress made in each year and a revised iteration of the *National Disability Inclusion Strategy 2017-2021* will be prepared following the mid-term review at end-2018.

Article 7(1): each Member State shall ensure that an inventory of assets is established and implemented with a view to identifying barriers to accessibility; providing information to users, and monitoring and evaluating progress on accessibility. [EU Regulation 1300 of 2014]

- Irish Rail Infrastructure Manager (IÉ-IM) already holds an Inventory of Assets.

In 2017, the European Union Agency for Railways issued a Recommendation to the European Commission on the common content and structure of an Inventory of Assets for Infrastructure. The functions of this Inventory of Assets consist of:

1. Identifying the existing obstacles and barriers to accessibility,
2. Providing practical information to users,
3. Monitoring and evaluating progress on accessibility.

We are mindful to avoid the imposition of any unnecessary administrative burdens but the existing Inventory of Assets can be reviewed to ascertain if it is adequate and fit for purpose or if, having regard to the Recommendation referred to above, some tweaking of its functions are required. If necessary, consideration will be given as to whether or not a national rule ought to be prepared to formally assign the duties under Article 7(1) of EU Regulation 1300 of 2014 to IÉ-IM.

1.3. Reference points for the elaboration of the NIP (associations consulted, local transport authorities consulted, interface with other NIPs, etc.)

This initial compilation of the NIP synopsises the work in progress to address the requirements of the TSI. Although stakeholder associations were not directly consulted in the formulation of this document, they are consulted on an ongoing basis by Irish Rail in the formulation of its strategy and execution of its programme to make railway stations accessible to all, which commenced in the year 2000.

The intent of Irish Rail's strategy was to address all issues that were perceived to be a barrier to mobility impaired customers. From a design perspective the objective was to assess all points of customer interface from entering at a station boundary right up to the point of boarding a train, and to assess the reverse of this from the point of disembarking a train.

As part of the Irish Rail IÉ-IM's Project Management process, the end user representatives were consulted during the feasibility phase to ensure that the end design will meet the user requirements. Typically consultation would take place with The Irish Wheelchair Association, The National Council For the Blind Ireland, the Joint Mobility Unit and Consultant Architects specialising in good design practise for disabled customers.

Part of this consultation process is to build mock-up facilities of proposed designs, invite user groups to test these prototypes and implement the results into the final design.

With regard to Rolling Stock, it is a policy of the Irish Rail Chief Mechanical Engineer's department (CME) that all new rolling stock will conform to the TSI for PRM, and that upgrades to existing rolling stock will conform to the TSI for PRM where feasible.

It is the aim of Irish Rail that rolling stock will be progressively improved in a way that optimises the benefit to the travelling public. A recent example would be the refurbished cross-border Enterprise train that was completed in 2015.

On the subject of public consultation in relation to accessibility to rail passenger services, it should be noted that the public transport sectoral plan titled '*Transport Access for All – 2012 edition*' that was published by the DTTAS in 2013 is being updated (December 2017) and a stakeholder consultation is being undertaken. In addition, wide and extensive consultation was held in 2016-2017 in connection with the preparation of the *National Disability Inclusion Strategy 2017-2021*. This consultation covered ground on the transport passenger service accessibility requirements of persons with disabilities (persons with reduced mobility).

2. Current situation

2.1. Overview of the inventories: stations

Irish Rail has a total of 144 operational stations. Of these, 59 stations have lifts or escalators. The remaining 85 stations have a mix of both compliant and non-compliant access. It is intended, subject to funding, to regularise all non-compliant ramps by replacement with lifts or ramps that comply with the current regulations, prioritised on a risk basis.

- For infrastructure works, Building Regulations Part K - Stairways, Ladders, Ramps and Guards and Building Regulations Part M - Access and Use, are used in association with relevant aspects covered within TSI INF including railway platforms.
- The use of relatively high platforms, with standard height of 915mm, throughout the national network is helpful in the management of stepping height when boarding or disembarking from a vehicle. However, the stepping gap between platform and vehicle can be considerable, particularly where the platform is located on a sharp curve or on a reverse (S-shaped) curve.
- Currently, there are 29 stations with non-compliant platform tactile surface. There are also issues with non-compliant handrails, step-nosing and tactile surfaces at stepped locations. Some bridges and entrances are protected structures under planning law and predate current regulations.
- Toilet facilities for mobility impaired customers supplied for new build & major refurbishments comply with current regulations.
- A review of ticket counter heights and a project of de-manning is currently underway at stations.
- 35 stations are currently being installed with compliant signage for visually impaired users, the remaining 109 stations signage upgrade will be done according to the level of available funding.

Commitment to deliver on accessibility for PRM is demonstrated by the rolling programme of accessibility works being delivered:

- At least 84 out of the 144 railway stations on the Irish Rail-Iarnród Éireann network have received accessibility upgrades or were constructed new to full accessibility standards.
- Since 2007, 17 Irish Rail stations have been built to accessibility standards.
- Installation of a fully accessible lift and associated works at platforms 6/7 in Connolly Station, Dublin, which were identified as one of the major accessibility issues on the rail network, were completed in 2016 and the lift has been fully operational since May 2016. Resurfacing

works and new signage and information have also been provided.

An Accessibility Audit carried out in 2014 identified 54 stations across the network that required accessibility enhancements.

- **2015:** five of these 54 stations: Kilcock, Enfield, Maynooth (Maynooth line) and Kilcoole and Wicklow (Rosslare line) had accessibility enhancement works completed.
- **2016:** works continued at Mullingar, Leixlip Louisa Bridge, Rathdrum and Carlow. Improvements include installation of accessible gates, railings, improved signage, new footpaths and elimination of steps in favour of accessible ramps.
- **2017:** work programme included 6 works packages:
 - Ashtown and Leixlip Louisa Bridge
 - Cork-Cobh line: Little Island, Glounthane, Fota, Carrigaloe, Rushbrook and Cobh.
 - Cherryville to Waterford line: Athy, Carlow Muine Bheag and Thomastown
 - Limerick Station
 - Carlow and Mullingar
 - Castleknock and Ennis

Programmes of work packages for year 2018 and later will be identified and given a timeframe for delivery in accordance with the availability of funding.

2.2. Overview of the inventories: rolling stock

Irish Rail has 12 passenger rolling stock fleet types, ranging in age from approximately 10 to 30 years old. The vehicles were built to the applicable standards of the time resulting in a mix of both TSI PRM compliant and non-compliant vehicles.

For passenger rolling stock, the UK Rail Vehicle Accessibility Regulations 1997 (RVAR) were consulted prior to the introduction of the TSI LOC-PAS and TSI PRM. This has helped to facilitate the use of older rolling stock by people with reduced mobility.

Nevertheless, level access will remain a problem with rolling stock of standard design where the vehicle floor height is greater than the platform height. Level access is less problematic with suburban electric rolling stock equipped with low profile bogies.

2.3. Overview of the inventories: operational rules

In terms of provisions for current train users with disabilities, Irish Rail operates a system of assistance for all customers. This is documented and provided on their website at -
<http://www.irishrail.ie/travel-information/disabled-access>.

A Guide for Rail Passengers with Disabilities was published by Irish Rail in 2015. This provides specific guidance to rail users with disabilities and is available to customers at -

http://www.irishrail.ie/media/contents-guide_for_rail_passengers_with_disabilities_2015_1.pdf.

3. Definition of a strategy

The national strategy is to achieve transport access for all.

3.1. Objective

The objective is that the proportion of passenger-journeys that cannot be performed step-free should be reduced by 2% year on year, until a target level of 80% step-free passenger-journeys is achieved.

This approach recognises the progressive difficulty in achieving incremental improvement with fixed resources.

Irish Rail should produce a base-line report and subsequent annual reports showing the proportion of passenger-journeys that cannot be performed step-free, stating its assumptions, methodology and results.

Note:

An ‘obstacle-free route’ is a link between two or more public areas dedicated to the transport of passenger. It can be navigated by all persons with disabilities and reduced mobility. In order to achieve this, the route can be divided to better meet the needs of all persons with disabilities and reduced mobility. The combination of all the parts of the obstacle free route constitutes the route accessible for all persons with disabilities and reduced mobility.

A ‘step-free route’ is a division of an ‘obstacle-free route’ that meets the needs of mobility impaired persons. Changes in level are avoided or, when they cannot be avoided, they are bridged via ramps or lifts.

3.2. Prioritization rule

3.2.1. Stations

Budget spend to undertake works to stations identified as requiring upgrade with lifts and ramps to provide an obstacle-free route will be undertaken on a priority basis. The criteria utilised to identify and prioritise works is based on a number of factors, including -

- a) Daily passenger flow (i.e., daily average number of embarking and disembarking passengers over a full year);
- b) Stations with a remote platform accessed by footbridge or by white light level crossing, and
- c) Stations with a large number of users with reduced mobility.

In general, an existing station with a daily passenger flow of 1 000 passengers or less would be seen as low priority, provided that another station with a fully compliant obstacle-free route to all platforms in use is within a reasonable distance on the same suburban rail route, on the same outer-suburban route, on the same rural route, or on the same intercity route. The distances (km) to be regarded as reasonable will be determined in the 12 month review.

3.2.2.

With regard to Rolling Stock, the criteria utilised to identify and prioritise fleet replacement or upgrade is based on a number of factors. These principally include but are not limited to the age of

the fleet and the condition of the particular asset.

3.3. Criteria according to which subsystems are treated in the plan

3.3.1. Stations

All new stations and all stations undergoing major upgrades are designed to comply with the current building regulations appertaining to persons with reduced mobility.

3.3.2. Rolling stock

All new rolling stock will conform to the TSI PRM. Existing rolling stock undergoing a major upgrade will be designed to comply with the TSI PRM and current regulations appertaining to persons with reduced mobility where this is feasible.

4. Technical and operational means

4.1. Extent of upgrade or renewal

4.1.1. Stations

In order to assess a station for accessibility, a risk assessment is undertaken from the point of entry at the station boundary to the point of boarding a train. This ensures all persons with reduced mobility entering the station by non-vehicular means can do so with step free access, car parking spaces are designed in accordance with building regulations and positioned as near as possible to level access the station building, access to and from station buildings is step free, counter-heights are in accordance with the building regulations, lift cars are designed for both wheelchair and ambulant users and new signage takes cognisance of visually impaired and is subject to continual improvement.

- Tactile warning surfaces are utilised in accordance with building regulations and transport design guidelines.
- Staircases have dual-handrails and are painted in a contrasting colour for the visually impaired.
- Staircase step-nosing is highlighted and colour contrasted for visually impaired customers.
- Irish Rail is presently working on a revised suite of customer interface standards relating to furniture in stations and way finding, with full consultation of the user representative groups.

4.1.2. Rolling stock

Each provider of passenger rolling stock will be encouraged to produce and maintain a suitable inventory of assets with reference to the TSI PRM and Annex F thereof.

4.2. All other works aimed at eliminating barriers to accessibility which are outside the scope of Article 20 of Directive 2008/57/EC

'Minor upgrade and renewal' works outside of the scope of Article 20 of Directive 2008/57/EC are encouraged. Such works can achieve interim 'quick wins' by providing the users with obstacle-free routes without fully upgrading the station.

4.3. Deployment of operational measures (assistance) to compensate the remaining lack of accessibility

Passengers with disabilities are encouraged to contact Irish Rail in advance of their trip so that their route may be planned and facilitated. Normally at least one day's notice is expected where personal assistance is needed, so that staff may be deployed at the departure, interchange and destination stations. Special arrangements may have to be made for routing of trains at certain stations that have isolated platforms which are not accessible to persons with restricted mobility.

5. Financing

5.1. Cross-references

5.1.1. Contract agreements (Directive 2012/34/EU art. 30)

Funding is provided by the National Transport Authority for Capital Investments and via the infrastructure manager Multi-Annual Contract.

An audit of railway stations was undertaken by the National Transport Authority in 2014 of the 54 stations on the railway network that, at the date of that audit, had not received any enhancements under the on-going accessibility programme.

5.1.2. Public service contracts (Regulation (EC) No 1370/2007)

Rail services are operated under a single public service (PSO) contract and there is one railway infrastructure manager.

An audit of railway stations, undertaken by the National Transport Authority in 2014, identified that the cost of completing all of the works identified in the accessibility audit would be €79 million. Since then approximately €3 million of works have been carried out. Accordingly, the cost of the outstanding works to make all of the stations fully wheelchair accessible is in the order of €76 million. Priority in the roll-out of accessibility works will be given to the stations with the higher number of passengers.

5.2. Other resources

Minor upgrades to infrastructure are facilitated via the Station Access Agreement.

6. Follow-up and feedback

6.1. Update of the inventory of assets and comparison with the objectives

Irish Rail undertakes asset inspections of stations on an annual basis and continually updates the IAMS asset data base.

A non-compliance log of stations is kept so as to highlight issues that do not comply with the current building regulations as well as relevant standards including for disability and mobility related issues. When funding is made available, these non-compliances are put forward for inclusion in relevant remediation programmes.

6.2. Update of this national implementation plan

This is the first national implementation plan for Ireland. It is viewed as being a live document and will be reviewed in consultation with infrastructure manager, the railway undertakings, the National Transport Authority, and representative associations of users including disabled persons and persons with reduced mobility tied in with the review and implementation of the *National Disability Inclusion Strategy 2017-2021 and measures in the DTTAS public transport sectoral plan 'Transport Access for All'*

It is intended to update this NIP in 12 months' time when in a better position to address the following in more detail:

- *Article 8(3): The national implementation plans shall run over a period of at least 10 years and shall be updated regularly, at least every five years. [EU Regulation 1300 of 2014]*
- *Article 8(8). Member States shall revise their national implementation plans in accordance with the priorities referred to in paragraph 7 within 12 months of the adoption of the revised TSI. [EU Regulation 1300 of 2014]*
- *Article 8(9). Member States shall notify the revised national implementation plans referred to in paragraph 8 and any other updates of the national implementation plans referred to in paragraph 3 to the Commission not later than four weeks after their approval. [EU Regulation 1300 of 2014]*