

Ireland 2040 Our Plan – National Planning Framework

NDA Submission on the Draft Public consultation document

The National Disability Authority (NDA), as the independent statutory body provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities. We have a role to assist the Minister for Justice and Equality in the co-ordination of disability policy.

Our functions include research, developing and collaborating on the development of relevant statistics; assisting in the development of standards; developing codes of practice and monitoring the implementation of standards, codes and employment of persons with disabilities in the public service.

Background and context

Among the issues that will form the context for this submission are

- Ireland’s ratification and implementation of the United Nations Convention on the Rights of Persons with Disabilities
- European Union policies and directives including the forthcoming EU Accessibility Act and the EU Disability Strategy 2010-2020
- A new EU Web directive on all information being accessible (all EU countries to ratify it 23rd of Sept 2018) please note that the current online version of the Draft NPF is not in accessible PDF format. The NDA would be happy to assist the DHPLG on how to provide accessible information for the future.
- Relevant International, European and national standards
- Continued implementation of the National Disability Inclusion Strategy 2017-2021
- Continued implementation of the National Housing Strategy for People with Disabilities under the remit of Rebuilding Ireland
- Continued efforts to improve the accessibility of our public transport network, covering national, urban and rural transport

The National Disability Authority through its Centre for Excellence in Universal Design (CEUD) would like to thank the Department of Housing, Planning, and Local Government for the opportunity to give input and feedback on the National Planning Framework (NPF). The NPF gives Ireland the opportunity to become a world leader in providing a society that is accessible to all regardless of age, size, ability or disability.

The work of our CEUD is to promote the Universal Design of products, services, information and communication technologies and the built

environment so that they can be easily accessed and used by everyone, regardless of age, size, ability or disability.

We highlight a range of points in the following on how Universal Design can enable an effective planning framework and the achievement of objectives. We have undertaken research and developed national guidance, resources and learning that would be helpful to the various areas covered by the framework. As a statutory agency we would be happy to play our part in ensuring the framework is effective in its implementation.

Summary

Changing demographics as highlighted in the latest Census 2016 show a total of 643,131 people with a disability living in Ireland, accounting for 13.5 per cent of the population; this represents an increase of 47,796 persons on the 2011 Census figure of 595,335 when it accounted for 13.0 per cent of the population. The number of people aged 65 and over with a disability has increased from 204,069 to 224,388 over the five years, a rise of 20,319¹.

In addition, the ERSI report October 2017² states that;

- The population of Ireland is projected to grow by between 14 to 23 per cent adding 640,000 to 1.1 million people;
- The share of population aged 65 and over is projected to increase from one in eight to one in six;
- Numbers of people aged 85 and over are projected to almost double;
- Demand for health and social care is projected to increase across all sectors, with the greatest increases for services for older people;
- Demand for home help care and for residential and intermediate care places in nursing homes and other settings is projected to increase by up to 54 per cent;
- Demand for public hospital services is projected to increase by up to 37 per cent for inpatient bed days and up to 30 per cent for inpatient cases;
- Demand for GP visits is projected to increase by up to 27 per cent.

These latest statistics clearly highlight that Ireland has a growing ageing and disabled population who need to be considered in any new national planning framework. As stated in the NPF document, the clear vision for Ireland is

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http://www.cso.ie/en/media/csoie/newsevents/documents/census2016summaryresultspart2/Chapter_9_Health_disability_and_caring.pdf

² <http://www.esri.ie/news/demand-for-healthcare-projected-to-increase-substantially-with-rapid-growth-and-ageing-of-population/>

creating an equitable society as well as an environment that is accessible, understandable and usable for all its citizens regardless of their age, size, ability or disability.

The NDA would therefore recommend that a Universal Design approach should underpin the NPF as means of proactively addressing some of the above challenges. As highlighted above, Universal Design enables planning and design of the environment with regard to all citizens regardless of their age, size, ability or disability. Universal Design ensures an inclusive approach to produce effective design solutions that benefit everyone, whereby citizens are supported to engage in the planning process and it enables people to fully engage in designing their own futures.

Universal Design also makes sure any new building, infrastructure, product or service is accessible, understandable and usable for all citizens. When environments are people-centred in design, convenient and a pleasure to use, everyone benefits. Simply put, Universal Design is good design.

Making Stronger Urban Places

The NDA would recommend that National Policy Objectives 4, and 6 which cover the Urban Environment need to state that the approach taken embraces the principles of Universal Design.

The NDA/CEUD has conducted research³ and published recommendations that specifically look at the design of both urban spaces and home zones that make the urban environment safer as well as user-friendly for all citizens, and we believe this would be of assistance to the editors of the final NPF.

National Policy Objective 4

We recommend the rephrasing of this Policy Objective as follows:

Ensure the creation of attractive, livable, **universally** designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 6

We recommend the rephrasing of this Policy Objective as follows:

Support regeneration of cities, towns and villages of all types and scale in order to accommodate changing roles and functions and enhanced levels of amenity and **universal** design in order to exert a positive influence on their surrounding area.

³ 'Shared Space, Shared Surfaces and Home Zones from a Universal Design Approach for the Urban Environment in Ireland', Available for free download as an accessible PDF <http://universaldesign.ie/Built-Environment/Shared-Space/>

Planning:

Universal Design can add value to the planning process in Ireland. It is good practice to ascertain the needs of the range of expected users as early as possible, and to check the practicality and usability of emerging designs with a diverse user panel. Universal Design in Planning involves a considered approach to place-making based on an integrated assessment and understanding of the context and user needs.

Universal Design⁴ is important for planning for the following reasons;

- It helps us avoid bad development and help us to deliver genuinely sustainable solutions for communities
- It helps us to create better places - for all abilities and all age groups - equitable, inclusive, participative and accessible
- It avoids the need for wasteful and inefficient retro-fitting of solutions, as a these matters should be considered at the outset of the design process
- It informs genuinely integrated strategies for land-use, transportation and urban design
- It creates greater efficiencies for public infrastructure investment and produces better economic development models
- It widens the audience and market for well-considered development projects enhancing commercial viability
- It helps provide an environment in which people can age and retain their independence

National Policy Objective 11

We recommend the rephrasing of this Policy Objective as follows:

In urban areas, planning and related standards, including in particular building height and car parking, will be based on performance criteria enabling alternative solutions that seek to achieve **universally** designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment.

Heritage National Policy Objective 16

Maintaining and protecting our national heritage is very important as well as ensuring it is accessible and usable for all citizens. A key publication that the NDA would recommend as a reference in the final NPF publication, is the

⁴ 'Planning and policy', a booklet produced by the Centre for Excellence in Universal Design at the is part of the series 'Building for Everyone – A Universal Design Approach' <http://universaldesign.ie/Built-Environment/Building-for-Everyone/#figBfE9Planning>

guide developed in partnership with the Department of Housing, Planning and Local Government on ensuring that heritage sites are accessible to all⁵.

In addition the NDA has produced a statutory **Code of Practice on Accessible Heritage Sites** (2011)⁶. It sets out the obligations of the head of a public body and provides guidance to ensure that, as far as practicable, the whole or a part of a heritage site in the ownership, management or control of a public body, and to which the public has access, is accessible to people with disabilities and can be visited by them with ease and dignity.

National Policy Objective 16

We recommend the rephrasing of this Policy Objective as follows:

Enhance, integrate and protect, **for the benefit of all visitors regardless of their age, size, ability or disability**, the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations.

National Policy Objectives 21 and 23

Under National Policy Objectives 21 and 23 (Tourism and greenways/blueways), it is important that the design of the services and the physical environments are based on Universal Design principles that enable all citizens to use these tourist amenities regardless of their age, size, ability or disability.

It would be important to include the service perspective as part of the overall strategy in relation to Tourism. This area of customer engagement is vital to the growth of tourism in Ireland, which is a key reason for tourists coming to “The Land of a Thousand Welcomes”.

Ireland is leading internationally in having a National Engagement in Tourism Services Standard (I.S 373) and Tourism Service Toolkits for delivering customer services from a Universal Design approach. These tools have now been successfully applied here in Ireland and they are also being adopted by Visit Britain and Visit Scotland.

National Policy Objective 21

We recommend the rephrasing of this Policy Objective as follows:

Facilitate the development of the rural economy through supporting a

⁵⁵ <http://www.chg.gov.ie/app/uploads/2015/07/Access-Improving-the-Accessibility-of-Historic-Buildings-and-Places-2011.pdf>

⁶ <http://nda.ie/Publications/Environment-Housing/Environment-Publications/Code-of-Practice-on-Accessible-Heritage-Sites.html>

sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism, **based on universal design principles.**

National Policy Objective 23

We recommend the rephrasing of this Policy Objective as follows:

Facilitate the development of a National Greenways/Blueways strategy which prioritises projects on the basis of achieving maximum impact, **accessibility** and connectivity at national and regional level.

People, Homes and Communities

The NDA welcomes the focus on Universal Design in **Section 5 People Homes and Communities, Sub Sections 5.4 and 5.5.**

Good design of roads and streets in our towns and cities is key to ensuring that people can get out and about in their local area and participate in all their community has to offer.

There should be a greater emphasis on creating liveable and sustainable neighbourhoods, where people, regardless of their age, size, ability or disability can live full and active lives as part of a real community. Social Housing is not just about providing a roof overhead. **“Our Sustainable Future, a Framework for Sustainable Development for Ireland”** published by the Department of the Environment, Community and Local Government in 2012 stated that:

“Sustainable communities are places where people want to live and work, are environmentally sustainable and contribute to a high quality of life for residents. They are safe and inclusive, well-planned, built and run, and offer equality of opportunity and good services for all.”

Social housing tenants and society as a whole will benefit from the development of diverse communities, where people with disabilities are integrated into their local community.

Given the advantages of mixed use neighbourhoods in terms of the proximity of facilities and services that can meet people’s day to day needs, managing the overall quality of these areas should focus on maintaining viability, enhancing permeability and improving the quality of pedestrian routes and spaces.

In the '**Building for Everyone – A Universal Design Approach**⁷' series, the CEUD, promotes the concept and philosophy of Universal Design and encourages developers, designers, builders and building managers to be innovative and think creatively about solutions that meet the needs of all building users regardless of age, size ability or disability.

Given the wide diversity of the population, a Universal Design approach, which caters for the broadest range of users from the outset, can result in buildings and places that can be used and enjoyed by everyone. That approach eliminates or reduces the need for expensive changes or retro fits to meet the needs of particular groups at a later stage.

It is good practice to ascertain the needs of the range of expected users as early as possible, and to check the practicality and usability of emerging designs with a diverse user panel.

'Universal Design Guidelines for Homes in Ireland'⁸, these Home Design Guidelines are a first step in the process of raising awareness and inspiring people to think differently about the benefits of Universally Designed homes and the potential opportunity to address some of the global challenges society faces by future-proofing our homes through embracing Universal Design thinking.

Key principles for Universal Design Homes are:

1. Integrated into the neighbourhood;
2. Easy to approach, enter and move about in;
3. Easy to understand, safe to use and manage;
4. Flexible, cost effective and adaptable over time.

Covering Ageing population and people with Dementia:

Providing new dwellings or funding alterations to existing dwellings that are built/retrofitted in line with a Universal Design dementia friendly approach, will help people to remain living at home and in their community independently and safely for as long as possible. This approach will also support family members and carers to sustain the caring relationship, particularly if these carers are older people or a person with a disability.

Benefits of Universally Designed Homes for All;

- Flexibility and ease of adaptability to meet peoples' changing needs over time in a cost effective way;
- Sustainable design to improve comfort and energy efficiency; and,

⁷ <http://universaldesign.ie/Built-Environment/Building-for-Everyone/>

⁸ <http://universaldesign.ie/Built-Environment/Housing/>

- Smart technologies to support independent living.

Incorporating community facilities within Age Friendly Communities, neighbourhood centres and mixed use areas is also an essential part of neighbourhood planning. Delivering these facilities can provide the opportunity to address Universal Design principles.

‘Universal Design Guidelines Dementia Friendly Dwellings for People Living with dementia, Their Families and Carers’⁹,

These guidelines support the ‘Universal Design Homes for Ireland’ Guidelines and will help to inform national policy. The design guidance provided from a Universal Design approach can be used in practice by all stakeholders – those who commission, design, build, provide and occupy dwellings.

‘How Walkable is Your Town’¹⁰? is a report by Age Friendly Ireland and the Centre for Excellence in Universal Design at the National Disability Authority on the results of Walkability Audits in 2014. The walkability audits in eight Irish towns and urban centres in 2014, which are the focus of the report, demonstrate the benefit of a focus on universal design, in auditing how easy it is to get around with ease and find your way using roads and streets in urban centres.

National Policy Objective 28

We recommend the rephrasing of this Policy Objective as follows:

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by integrating physical activity, **recreation and leisure facilities for all regardless of age, size, ability or disability**, particularly prioritising walking and cycling accessibility to both existing and proposed future development, in all settlements.

National Policy Objective 29

We recommend the rephrasing of this Policy Objective as follows:

Local planning, housing, transport/accessibility and leisure policies will be developed **on the basis of universal design principles** with a focus on meeting the needs and opportunities of **all, regardless of age, size, ability or disability** along with the inclusion of specific projections supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

National Policy Objective 36

We recommend the rephrasing of this Policy Objective as follows:

⁹ <http://universaldesign.ie/Built-Environment/Housing/Dementia-Friendly-Dwellings/>

¹⁰ <http://universaldesign.ie/Built-Environment/Walkability-Audit/>

Support the provision of **universally designed** homes that can accommodate the changing needs of a household over time.

Homes: Key Principles in the National Planning framework

The consultation document states that over 550,000 households will be delivered over the lifetime of the NPF. The NDA would recommend that Universal Design principles are added to the list of Priorities and Principles and are also represented in the list of National core principles that.

National Policy Objective 33

Target the delivery of 550,000 additional households up to 2040 in accordance with the policy objectives of Ireland 2040.

PRIORITIES AND PRINCIPLES

We recommend the rephrasing of the Priorities and Principles as follows:

- Building Resilience - Reuse, adaptability, **usability** and accessibility in our housing stock ensuring integration to deliver vibrant sustainable communities.”

NATIONAL CORE PRINCIPLES ARE SET OUT TO GUIDE THE DELIVERY OF FUTURE HOUSING, AT EVERY LEVEL OF GOVERNANCE:

We recommend the rephrasing of the Core Principles as follows:

- Ensure a high quality standard of living to future home residents as well as providing environmentally and socially sustainable housing and place-making through integrated planning and consistently excellent design **from a Universal Design approach.**

Education and Life Long Learning

There should be a greater emphasis in **Section 5.6, Education and Lifelong Learning**, on upskilling and Continuous Professional Development (CPD), to support delivery of the National Planning Framework and its vision for a...

‘fair society,..... in which all individuals , businesses, communities and regions have the opportunity to prosper’.

It is important that the workforce, particularly those working to deliver the National Planning Framework in areas such as Housing, Health, Education, Employment, National and Living Environment are equipped with the

necessary knowledge, skills and competence to deliver this vision, underpinned by a Universal Design approach.

Regarding building or refurbishing Educational Institutions adopting a Universal Design approach to design for diversity and inclusion for all students, staff and local community will provide a valuable contribution to the national dialogue, and inform the implementation of government policy for Shared Educational Campuses that fully consider human diversity. Campus layout, size and scale should be child friendly and create a sense of community, while architectural form and materials should reinforce the child-friendly nature of the Shared Educational Campus¹¹.

Realising our Island and Marine Potential

6.3 Ports

Accessible buildings and infrastructure are essential if passengers with reduced mobility are to access and use maritime passenger transport services in a safe, secure and confident manner. It can be challenging to improve the accessibility of many buildings and infrastructure, particularly older facilities or heritage buildings.

Operators of ports, harbours and piers may not always have control over all parts of a particular site, and may need to liaise with local authorities or other stakeholders. The size and extent of the facility and the nature of services provided at that location will all impact on the practicality of making accessibility improvements.

Operators should proceed with practical, achievable measures to improve accessibility in the short term, while putting in place a longer term accessibility programme to overcome any outstanding challenges. It is particularly important that new buildings or refurbishments are designed, built and managed according to best practices in accessibility.

The requirements of the International Ship and Port Facility Security (ISPS) Code are mandatory under both domestic and international law. It is important that the security requirements of the Code are not seen as conflicting with provision of an appropriate level of accessibility. Similar security requirements exist in other modes of transport, particularly air transport.

By integrating disability access and Universal Design into security planning and implementation and by training all personnel in disability equality (as well as

¹¹ <http://universaldesign.ie/Web-Content-/Research-on-Universal-Design-of-Shared-Education-Campuses-in-Ireland-Briefing-Note-Document.pdf>

security), successful outcomes can be achieved. Operators, working with other stakeholder agencies, can do a great deal to improve access to buildings, terminals and embarkation points

Guidelines for Accessible Maritime Passenger Transport¹²

The Department of Transport and the NDA have jointly developed Guidelines for Accessible Maritime Passenger Transport in Ireland. The Guidelines are aimed at making passenger journeys by ship, boat or ferry easier for everyone, irrespective of whether you are a person with a disability, you are travelling with children or luggage, or you simply find it difficult using steps.

The Guidelines provide practical advice and information for those involved in the provision of maritime passenger transport services and cover all aspects of the passenger journey.

Section 8 Realising our Sustainable Future

Under Section 8: Realising Our Sustainable Future the impact that climate change will have on the potential for major weather-related incidents in Ireland must be emphasised.

There appears to be no reference to any form of emergency planning in the document. References to emergency planning processes should be inserted in this section and – similar to previous references under section 5 – that they are developed based on universal design principles.

National Policy Objective 43b

We recommend the rephrasing of this Policy Objective as follows:

In line with the collective aims of National Policy regarding climate adaptation, to address the effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas **from a universal design approach.**

National Policy Objective 6 I

Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling, **which is accessible to all regardless of age, size ability or disability**, as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, green infrastructure planning and innovative design solutions

¹² <http://nda.ie/Publications/Transport/Transport-Publications/Guidelines-for-Accessible-Maritime-Passenger-Transport.html>

