



Disability Federation of Ireland submission to Galway County Development Plan 2022 – 2028

Introduction

The Disability Federation of Ireland (DFI) is established is to benefit the wider community by supporting the contribution, protecting the rights and valuing the role of people with disabilities in the community and encouraging their fullest participation in shaping a society that promotes wellbeing and quality of life for disabled people.

DFI welcomes the opportunity to submit our feedback to Galway County Development Plan 2022-2028 and we look to Galway County Council to support the local implementation of the United Nations Convention on the Rights of Persons with Disabilities and commit to ensuring the full equality of people with disabilities in County Galway.

Topic 1: Core Strategy and Housing

The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) is clear in its message that people have the right to be living independently in the community, and it is important that the right supports are in place for people to realise their rights.

According to the ESRI study (2018), *Discrimination and Inequality in Housing in Ireland*, people with disabilities experience high levels of discrimination whilst searching for housing and are over 1.6 times more likely to live in poorer housing conditions including damp housing, lacking central heating or living in areas with neighbourhood anti-social problems. People with disabilities make up 27.1% of the homeless population in Ireland, double the rate of disability in the general population at 13.5%¹. According to the last census, 9% of people who have a disability in County Galway lived in social housing compared to 5% of the general population.

The lack of suitable and affordable housing for people with disabilities is a crisis within the current housing crisis.

Amongst the various sub-populations of people with disabilities in County Galway who need housing support include:

- People under 65 years old who are placed into nursing homes due to a lack of adequate personal and social care (1,400 nationally).
- 2,000 people nationally who remain in congregated settings.
- Those who remain on social housing waiting lists (7,600 nationally).

¹<https://www.cso.ie/en/releasesandpublications/ep/p-cp5hpi/cp5hpi/nat/>

- People with disabilities who are currently living with older parents or family members. This includes disabled people represented by the local group, Proactive Carers, and young adults who have turned 18 years and over. They feel options for housing, personal and social independent living supports which meet their needs are severely limited and under-resourced and so they remain unrepresented in the data that is available.

Implementation, monitoring and evaluation of National Policy at local level

Ongoing deliberate strategic engagement between stakeholders of the Council, the HSE and the Voluntary Disability Sector must be made effective, to ensure real movement takes place to respond to the current crisis. National policy on housing, developed to support the implementation of such change needs to inform and be monitoring for impact through the Galway County Development Plan 2022-2028. These policies include:

1. National Housing Strategy for People with Disabilities.
2. A Time to Move on from Congregated Settings.
3. Sharing the Vision – a Mental Health Policy for Everyone.

Locally we are advocating for Galway County Council to:

1. Resource and support a fully trained, designated Disability Specific Technical Housing Specialist as has been provided to the Age Friendly Alliance. To support the better response now to the current and future housing needs of people with disabilities.
2. An open and transparent housing allocation process for people with disabilities, based on assessment/evidence of need.
3. Alternative and flexible housing solutions to be explored, a one-size-fits-all approach to meet the needs of an increasingly diverse population including children and adults with complex and multiple disabilities.
4. Recognition of the ageing population, which includes people with disabilities, who want to live independently.
5. Recognition of the broader housing supply issues including affordability, adequate standards and increased supply of social housing. DFI supports the recommendation of the Irish Wheelchair Association, namely “that there needs to be a commitment that all social housing projects supported through capital funding from the Department of Housing, Planning and Local Government deliver 10% of integrated fully wheelchair accessible social housing units within choice locations that are accessible to community amenities and transport links. The inclusion of fully wheelchair accessible design to be incorporated into each social housing project planning from the outset at stage 1 of the Capital Appraisal Process.”²

² See submission to the Galway County Development Plan 2022 – 2028 pending by the Irish Wheelchair Association.

6. Ensure the Galway County Housing and Disability Steering Group, HDSG, is effective and functions to the best standard, by:
 - a. Ensure council members and members of the Strategic Policy Committee on housing are aware of the HDSG and its remit and create linkages between the two committees.
 - b. Building better **working relationships** between this group, the Council and the HSE through existing mechanisms including the Public Participation Network, PPN and the Disability Consultative Forum.
 - c. Ensure representatives on the HDSG fully represent the interests of the **diversity of citizens with disabilities** from across the county and have a mandate and mechanism to do so, linking into the structures of the PPN including a more transparent connection to the work of the Council and this plan.
7. Work to promote and publicize the process through which housing applicants are assessed for, wait listed and allocated housing or housing transfers. Through direct support of initiatives including **Operation Sign Up** as delivered by the Irish Wheelchair Association.
8. Regularly provide **updated and publicly available data** regarding the number of persons with a disability on the social housing waiting list.
9. Improve communication with housing applicants and provide reasonable accommodation to ensure all communication is accessible; in a format that the applicant can understand. This should include:
 - a. Information on requests for additional information regarding the waiting list, how to make a complaint, report maintenance issues or request a housing transfer in easy to read and accessible format.
 - b. Training to Council staff on how to support the needs of the public of people with disabilities as they present their housing concerns.

Topic 2 and 3: Urban Living and Placemaking and Rural Placemaking and the Countryside

Placemaking and Planning

People with disabilities should have a choice of where to live; whether in a rural or urban setting.

To accommodate and ensure the safety of wheelchair users, people with mobility or sensory issues and vulnerable pedestrians, **footpaths should be widened**. The Covid-19 pandemic and social distancing has shown us just how necessary having enough space in the public realm is.

The council should also make commitment to universal design and accessibility as a condition of planning for all developers building new public spaces. For example, poor colour contrast means that grey stone bollards or steps cannot be seen against the surrounding grey environment and are a threat to people with sight loss.

Developers should be held to account when they are granted planning for spaces in the public realm.

Planners should also encourage applicants to go beyond Part M regulations in new buildings. The building regulations state:

“The guidance is based on providing a minimum clear turning space of 1800 mm x 1800 mm for a wheelchair. This space provision will be adequate for many wheelchairs, however some powered wheelchairs and scooters may require larger turning spaces.” (p.61, 1.4.3).

As a growing number of people use larger powered chairs or are themselves larger, it is advised that the space is widened. This will also accommodate carers or personal assistants who need to support a person with a disability as well as people who are the parents of small children and need space for their own wheelchair. DFI would recommend regard to the Irish Wheelchair Association Best Practice Access Guidelines as pending fourth edition this Autumn, with current edition available at <https://www.iwa.ie/downloads/about/iwa-access-guidelines.pdf>

Topic 4: Economic, Enterprise, Tourism and Retail Development

Employment / Social Enterprise

Only 22% of people who have a disability in County Galway were at work, compared to 54% of the general population in the county (CSO, 2016).

Galway County Council should aim to be a leader in promoting an accessible workplace and employing people with disabilities.

Initiatives aimed at increasing employment opportunities should work to target people with disabilities and other groups who are vulnerable to being discriminated against or becoming unemployed.

Ways of doing this include,

- Creating and promoting opportunities for employment and social enterprises that are flexible and allow for people to work reduced hours or work remotely.
- Improving access to broadband and assistive technology.
- Making employers aware of the benefits of employing a person with a disability, including eligibility for the Workplace Equipment/Adaptation Grant (WEAG) and the Employee Retention Grant Scheme.

Tourism

Article 30 of the UN CRPD states that people with disabilities should have equal opportunity to participate in cultural life, recreation, leisure and sport.

A report published by the European Commission found that more than half of the individuals with disabilities in the EU travelled during the 12 months between mid-2012 and mid-2013. In total, this group of travellers made about 170 million day trips and a similar number of overnight trips within the EU. By making our tourism

services accessible we can attract more and more people with disabilities to Ireland as it will be a disability friendly Tourist destination.

More than 46% of people over 60 worldwide have a disability. Older people made over 225 million day trips and 217 million overnight trips over the 12 months surveyed by the European Commission. These figures are likely to have increased in the last number of years as the population ages and countries around Europe slowly become more accessible.

If County Galway caters for the ageing population and makes tourism services and facilities accessible for all it will lead to greater numbers of people travelling to the county and increased revenues for the tourism providers. This is not to mention the number of families and carers who could be attracted that do not currently travel because of a lack of appropriate facilities, accommodation and poor access to attractions, local services and businesses.

Galway County Council need to work to ensure that its many tourist attractions are fully accessible to people visiting the county as well as to its own citizens. This needs to extend beyond physical accessibility. It should also include, for example, audible headsets being available for people who may struggle to hear a guide or have sight loss and need audio description of the environment and attraction. Investments should be made into assistive technologies such as interactive screens, which include text and sign language interpretation at attractions.

Tourist accommodation is already lacking in certain parts of the county and accessible tourist accommodation is even more difficult to find. Hoteliers, local businesses and those providing tours and accommodation need to be incentivised and encouraged to be more accessible. They also need to be made aware of the economic benefits of being disability friendly.

Working to make tourist attractions more accessible will only be an effective way to increase revenue for tourism, if consideration is given to the infrastructure of the county. People with disabilities visiting the county, like any other tourists, will need somewhere to stay, eat, use the toilet and a way to travel from one location to another. It is important that all aspects of this submission are considered.

Towns and villages across the county need to be more accessible and hotels, restaurants and shops need to be encouraged to make their services more accessible. Publicly funded buildings, which are being newly developed, should contain a Changing Places facility and a large accessible toilet.

Retail

Any planned upgrades or new developments in town and village centres should be universally designed. The number of older people and people with disabilities continues to rise and the local environment needs to reflect their needs and be accessible to all.

A holistic view should be taken to ensure towns and villages are not only safe spaces to get around but also provide local amenities, retail and transport options that are accessible. For example, there should be an area for buses to use which is level with the ground or footpath to ensure it is suitable for a ramp to be extended from the bus and used safely.

New retail areas should be universally designed. Retailers should be encouraged to make their premises accessible and open to all potential customers. This has the dual benefit of:

- The business enjoying the economic benefit of opening themselves up to 13% of the population in County Galway who have a disability, their families and carers.
- The customer with a disability being able to access local shops and services.

Retailers should be encouraged to keep their shops and the paths outside them clear from obstructions. The council have a role in encouraging retailers and members of the public to keep paths in towns and villages clear from obstructions such as:

- sandwich boards for advertising
- cars parking on footpaths
- wheelie bins and skips
- Street furniture
- Flowerpots
- bikes chained to railings
- overhanging hedges

The Council should continue to lend its support to the Make Way Day Campaign which highlights this each September.

The council should commit to improving the general accessibility on towns and villages. This includes mending cracked paths and kerbs, providing dished paving, ensuring traffic lights and pedestrian crossings are accessible tactile, audible, easy to see and use etc.

It also includes tackling the issue of dog fouling which can be particularly problematic for wheelchair users, those with mobility aids and people who experience sight loss.

The inclusion of Changing Places facilities should be a condition of planning for large retail units being constructed in town centres. Changing Places are different from standard accessible toilets. They include a ceiling track hoist, a centrally located toilet bowl with space either side for transfers or assistants, and a height-adjustable adult sized changing bench. The facilities offer added support and safety to both the person with a disability and their assistant or carer and maximise independence and comfort for people with complex needs. The UK has almost 1,400 Changing Places Facilities in public places, which they consider inadequate. Changing Places Ireland make a very conservative estimate that there are more than 11,000 people who need the use of 15 existing changing places toilets in Ireland. The figure excludes tourists with mobility differences and fails to capture the impact of changing places on those close to the direct user.

Topic 5: Infrastructure and Transport

Transport

17% of people who have a disability in County Galway did not have access to a car or van compared to 6% of the general population at the time of the last census.

This means that almost **1 in 6 people** with a disability are forced to rely on taxi's and buses.

A number of bus routes in and around the county are not accessible to people with disabilities. Galway County Council need to work with Bus Eireann and other providers as well as the Gardai, who have some responsibility for the placement of bus stops, to ensure that there is adequate bus stop and shelter infrastructure to safely operate wheelchair lift on buses. An audit of existing bus stops with cooperation from bus operators should be considered.

Galway County Council should work with relevant stakeholders to improve transport options for people with disabilities. Specialised transport options should not be introduced at the expense of improving the accessibility of mainstream transport options. However, where necessary the 'local link' bus service could be expanded to support an increased number of people with disabilities who lack transport alternatives.

Topic 6: Environment, Renewable Energies and Communications

Environment

Article 11 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), ratified by Ireland in 2017, stresses the importance of ensuring that weather alerts and other warnings related to citizen safety, are fully accessible to people with disabilities.

It is important that Galway County Council comply with the convention and make every effort to warn people with disabilities of any impending dangers, in a language and format which is accessible to them. This includes providing sign language interpreted videos, subtitles, text and audio on any warnings placed on the website or social media accounts, belonging to the council.

New initiatives to tackle climate change, such as those aimed at reducing dependency on privately owned vehicles in favour of public transport, should take into account the need for public transport to be fully accessible.

Renewable Energy

Renewable forms of heating such as underfloor heating and solar panels for hot water should be considered for installation in housing for people with disabilities.

Topic 7: Architectural and Archaeological Heritage

Heritage Sites

While the crucial importance of maintaining and preserving heritage sites is fully acknowledged, conservation should not come at the expense of accessibility.

International and National heritage sites have proven that access to historical sites can be improved for people with disabilities and older people without destroying or compromising the heritage of the site. The Rock of Cashel in Co. Tipperary is one such site where ramps were used in places where large structural works weren't possible.

Galway County Council should approach the task of upgrading historical sites creatively and find imaginative solutions to improving accessibility for all.

Topic 8: Social, Community and Cultural Development

Playgrounds

Other areas of recreation, such as children's playgrounds, should also be accessible to all and should encourage interaction between children with disabilities and their peers. Disability friendly playgrounds can include:

- wheelchair accessible looped boardwalk and access ramps
- wheelchair accessible, adaptive and high-backed swings
- wheelchair accessible merry-go-rounds e.g. Athenry playground
- wheelchair accessible roundabouts
- wheelchair accessible mazes
- multi-sensory apparatus such as a sand factory, play tables, sensory wall or garden, textured surfaces and rich colours
- accessible picnic areas

Sports

As mentioned above, the development of accessible multi-use community facilities should be supported by Galway County Council. Many mainstream sports facilities in towns and villages have their roots in small voluntary organisations. It is beyond the reach of many of these clubs to immediately upgrade their facilities to make them accessible to all. Multi use community facilities would provide greater opportunities for people with disabilities to be involved in mainstream sports clubs and groups in their community.

As well as ensuring access to mainstream sports facilities and tourist attractions, people with disabilities should have the opportunity to participate in disability-specific

sports in the county. Galway Sports Partnership as well as disability-specific clubs, such as Galway Speeders, and individual disabled athletes should be supported to ensure they can continue to provide these opportunities.

Arts

The development of accessible multi-purpose cultural and arts community facilities should be encouraged. They can provide a social outlet for people who are isolated or need support to live independently in the community. They also offer people with disabilities and others the opportunity to engage and participate in a range of community activities such as art exhibitions, drama groups, film and comedy clubs that they may currently be excluded from because of the inaccessibility of facilities. By providing physical access for artists and audiences with disabilities Galway County Council will be able to:

Champion the creativity of artists with disabilities by providing greater visibility for the work of artists with disabilities.

Encourage the commission of new and innovative work by artists with disabilities across all platforms.

Showcase the work of artists with disabilities from Galway, Ireland and abroad in collaboration with arts venues, galleries and festivals.

Promote inclusive experiences for audiences with disabilities of all ages.

Ensure arts programme information is fully accessible for all audiences.

Adopt an inclusive approach to audience inclusion and participation around infrastructure, marketing and programming.

Pedestrian paths

Safe and accessible paths, cycleways and walkways between residential areas and schools and commercial areas should also be supported to encourage people with disabilities and older people, who may have limited access to transport to participate in their communities. Benches and rest stops should also be dotted along the routes.

Topic 10: Natural Heritage, Landscape and Green Infrastructure

Natural Heritage

Natural heritage should also be accessible to all. Wheelchair viewing platforms should be added where possible and signage should be accessible and interactive and audible. Blue ways, Greenways and Cliff Walks should have safe, accessible, level surfacing and accessible viewing areas. Adequate rest stops, help-points and charging points should also be included.

Additional Comments

1 in 6 people in Ireland have a difficulty with literacy. The County Development plan, once written and compiled should be assessed to ensure it meets plain English guidelines. This will ensure it can be understood by the public, for whom it is written, and does not contain difficult to understand language and acronyms.

The plan should also be available in accessible formats and any further public consultations should take accessibility for all into account.

Submitted on behalf of DFI by:

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