



*Irish Wheelchair Association Submission to the development of Galway County Council
County Development Plan 2022 - 2028*



**Irish Wheelchair Association Submission to
Galway County Council County Development Plan 2022 - 2028
10th September 2020**

Irish Wheelchair Association - Submission to Galway County Council County Development Plan 2022 – 2028 consultation.

Goal: Making Galway One of the Most Accessible Counties in Ireland

Introduction

Irish Wheelchair Association is Ireland’s leading representative organisation and service provider for people with physical disabilities. With our 20,000 members, over 2,500 employees, 57 local community centres and approximately 1,000 volunteers, we are a groundswell of people across Ireland calling for the rights of people with physical disabilities to be met.

Irish Wheelchair Association provides a range of services to people with disabilities in Galway County including:

- Trained personal assistants support people to live the life they choose in their local community through in-home supports, personal care, transport etc
- A range of programmes and activities are coordinated and operated from its Community Centre at Dooga Tuam in County Galway.
- Respite and holiday services
- IWA’s school of motoring and adapted car supports people with physical disabilities to commence, or return to, driving and consequently enhancing their access to the community and personal independence. Assessments and driving lessons are provided.
- The Association’s fleet of wheelchair accessible buses support people who do not have access to accessible transport to access community across County Galway and IWA services.

Vision

Irish Wheelchair Association has a vision of an Ireland where people with disabilities enjoy equal rights, choices and opportunities in how they live their lives, and where our country is a model worldwide for a truly inclusive society.

Opportunity

Local Authority County Development Plans provide local councils with the opportunity to listen and to respond to the needs of people with physical disabilities in their communities, homes and lives. We urge you to meet the needs of Ireland’s citizens and to join with us in building an inclusive and accessible Ireland.

Galway County Council has an opportunity in the development of its' County Development Plan to enhance the accessibility of the County, including the built environment and services, and promoting Galway County as a destination of choice for people with physical disabilities, their families and friends.

Background

It is well documented¹ that people with disabilities continue to face a range of social, environmental, economic and attitudinal barriers which hinder social inclusion. It can be said with confidence that the existence of these barriers leads to people with disabilities experiencing disadvantage within their communities in various forms. Equally, it is recognised that the participation of people with disabilities as citizens, students, customers and employees, benefits society as a whole.

Irish Wheelchair Association (IWA's) direct aim in contributing to Galway County Council's Development Plan consultation, is to continue its work in promoting and advancing the vision and realisation of an all-inclusive and accessible society.

It has long been recognised that accessibility, in the broadest sense, for everyone within local communities is a fundamental prerequisite of inclusion. Historically however, the inclusion of people with disabilities was not an integral part of policy and regulation development in the areas of housing, transportation, the economy and the environment. Policies to support and enhance inclusion for people with a disability came later and in piecemeal fashion creating a legacy issue that as a society we are still trying to address today. Without access to local communities at these very basic levels, people with disabilities could not and still do not obtain equal access, compared to non-disabled peers to:

- employment opportunities
- education
- social activities
- activities of daily living
- health care etc.

These social and economic barriers are still contributory factors to the high levels of poverty and unemployment experienced by people with disabilities. IWA recommends that the

¹ *National Disability Inclusion Strategy 2017-2021* <http://www.justice.ie/en/JELR/Pages/WP17000244>
National Housing Strategy for People with a Disability 2011-2016 – extended to 2020
http://www.fedvol.ie/fileupload/Next%20Steps/National%20Housing%20Strategy%20for%20People%20with%20Disabilities%202011_2016.pdf

promotion and development of a socially and economically inclusive society for people with disabilities must be a high-level priority within all Local Government County Development and Corporate Plans.

Policy Context

Significant legislation exists nationally and internationally to guide and inform policy and planning to support the rights of community participation for people with disabilities. Both National and European legislation is framed by the principles of **equity, social justice, fairness, accountability, sustainable economies and environmental access**. These principles mirror the principles of Galway County Council in its' Development Plan 2015 – 2021. Policy and direct actions driven by these principles are important enablers towards community, social and economic participation for all people including for people who have a disability.

Most recently Ireland committed in 2018 to the realisation of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) ² which can perhaps, be best realised at a local community level, supported by a national framework. The development of a County Development Plan offers Galway County Council the opportunity to align its' intended actions with the aspirations and commitments made by Government to people who have a disability under the UNCRPD. The commitment to the UNCRPD was made since Galway County Council's most recent Development Plan 2015 – 2021 was agreed.

IWA's recommended actions for inclusion within the Galway County Council County Development Plan as set out below are framed under relevant Articles of the UNCRPD.

Cross Cutting Themes

In planning to achieve the aspirations and commitments made under the UNCRPD, IWA recommends that the cross-cutting themes to be addressed within Galway County Council's County Development Plan in the provision of public services to people who have a disability must include:

- Mainstreaming of all public services whereby services are supplemented and enhanced by agreed disability specific measures
- Sustainability, social inclusion, disability proofing and high-quality Universal Design must be the influencers and enablers in the development of all local policies, actions and Programmes for the diverse requirements of all citizens to be meet.

² *United Nations Convention on the Rights of Persons with Disabilities* (UNCRPD) <https://www.ihrec.ie/crpd/>

- Real and continuous consultation with people who have a disability and their representative organisations
- Strategic planning and ongoing monitoring and review of the effectiveness of service provision to people generally and particularly to people who have a disability.

Pillars for Action

IWA proposes that Galway County Council sets out its County Development Plan 2022 – 2028 under the following six Pillars with a commitment that each Pillar and any proposed additional Pillar, align with the relevant Articles within the *United Nations Convention on the Rights of Persons with Disabilities* (UNCRPD) and that commitments to disability be supported with agreed disability specific measures.

1. UNCRPD Pillar 1

Inclusive Approach to Planning

The European Social Network highlights how the principles of the UNCRPD can be brought into local planning, “Enabling people with disabilities to live independently and to participate in community life is a principle enshrined under the [UN Convention on the Rights of People with Disabilities \(UNCRPD\)](#), signed by Member States and the European Union. The role of regional and local authorities in planning for inclusive community-based services which allow for inclusion, is key to ensure the successful implementation of the Convention.”³ Local government is at the heart of the community and therefore well placed to respond to the requirements of people with disabilities. Through a broad range of positive measures and local initiatives, Local Government has already achieved improved access with regards to facilities and services. It is proposed by IWA that Galway County Council’s new County Development Plan be moved beyond compliance with legislation to the point where disability, inclusion and accessibility become seamless principles of each action committed within the County Development Plan. The adoption of such an inclusive approach within the overall strategy for how a county, its’ environs and services are planned and delivered will have a considerable and lasting effect on creating an equal standard of living for people with disabilities.

³ European Social Network <https://www.esn-eu.org/news/how-should-local-government-plan-inclusive-communities>

IWA Recommends

In order to achieve a cohesive and inclusive approach to disability issues IWA recommends that Galway County Council's County Development Plan must be aligned to all relevant disability specific legislation emanating from the Disability Act 2005 and to aspirations set out under the Articles of the UNCRPD. Going beyond legislative compliance, the aspiration to achieve best practice should be the driver and enabler to the Council's Development Plan. This disability specific legislative alignment and commitment to best practice that can achieve exemplar practices at regional and local levels, will ensure that a sense of civic inclusion and local ownership is created in meeting strategic objectives and commitments.

2. UNCRPD Pillar 2

Infrastructure and the Public Realm

Article 9 of the UNCRPD seeks "to promote and protect disabled peoples' right to live independently and be included in the community."

Irish Wheelchair Association members continue to experience daily restrictions in their lives due to poor or bad accessibility within the built environment. In 2009 IWA developed the first edition of its' *Best Practice Access Guidelines* in order to address the experiences and concerns of its members in accessing local communities. The *IWA Best Practice Access Guidelines* aim to address the numerous accessibility issues identified by IWA members and to provide access solutions based on up-to-date national and international best practice. In a recent consultation that will inform the upcoming fourth edition of the *Irish Wheelchair Association Best Practice Access Guidelines* IWA members related how they continue to experience environmental barriers within local communities and reaffirmed IWA's mandate to continue to advocate for much improved accessibility.

IWA Recommends

IWA recommends the promotion and delivery of an all-inclusive and accessible environment and calls on Galway County Development Plan 2022-2028 to adopt, utilise and promote the *Irish Wheelchair Association Best Practice Access Guidelines* Edition 4 2020 within all areas of building and environmental design.

The *IWA Best Practice Access Guidelines* underpinned by a Universal Design approach, go beyond the minimum requirements outlined in Irish building legislation and exceed some of the guidance in international documents. The *IWA Best Practice Access Guidelines* are informed by international best practice and are based on the needs and requirements of IWA members many of whom use large motorised wheelchairs and who may require

personal assistance. The IWA guidelines are intended to create a built environment that will accommodate people with varying levels of disability now and into the future without the need for further adaptation or alteration.

Particular examples of best practice accessible design provision within the public realm include:

- Provision of accessible parking bays for multipurpose personal use vehicles alongside standard accessible parking bays
- Provision of accessible electric car charging points
- Provision of pavements that are sufficiently wide for two people using wheelchairs or pushing buggies to pass while going in opposite directions
- Barrier free environments where defined safe pedestrian areas and pathways are free of obstructions, parked vehicle, bicycles illegally parked, street furniture, encroaching cyclists and vehicles etc.
- Provision of dished pavements and appropriate tactile surfacing at all crossing points and always on opposing sides of a crossing
- Provisions of controlled crossings in agreed locations
- Provision of a network of **Changing Places bathrooms** across each county
- Provision of play areas with surfaces and play equipment that is inclusive and accessible to all children and particularly to children who have a mobility impairment
- Provision of physical divisions between pavements and any adjacent cycle tracks
- Provision of best practice accessible design within all public buildings and facilities and a commitment to upgrade existing buildings and facilities where enhanced access is identified as being required
- A recognition that 'Shared Space' is problematic for people who have a disability and generally for vulnerable people resulting in a commitment to avoid 'Shared Space' design that does not provide agreed safety features for vulnerable pedestrians

IWA encourages Galway County Council to embrace a Universal Design approach in adopting *the Irish Wheelchair Association Best Practice Guidelines* Edition 4 2020 to inform its' planning and design in all aspects of the Public Realm.

3. UNCRPD Pillar 3 Social Housing.

Article 28 of the UNCRPD on providing an Adequate Standard of Living and Social Protection states that, “governments must ensure access by persons with disabilities to public housing programmes.”

The experience of IWA members who are wheelchair users in accessing social housing has not been positive. People who are wheelchair users typically spend long waiting periods on social housing lists with no time frame within which to expect an offer of housing. Despite the ongoing implementation of the National Housing Strategy for People with a Disability there is still no strategically planned annual supply of fully wheelchair accessible properties. IWA’s understanding of a fully wheelchair accessible property is set out in chapter 10 of *IWA Best Practice Access Guidelines* whereby a property is designed to be sustainable over the lifetime of a person who is a wheelchair user, as needs, use of mobility and exercise equipment and the requirement for personal assistance change.

IWA Recommends

IWA recommends Galway County Development Plan to commit that that all social housing projects supported by capital funding from the Department of Housing, Planning and Local Government deliver a minimum 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.

4. UNCRPD Pillar 4 Transport.

Article 9 of the UNCRPD on accessibility asserts that, “parties shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications.”

While the UNCRPD requires Ireland to take appropriate measures to make sure that people with disabilities have access to transport on an equal basis with other IWA members regularly report experiences whereby they have been; stranded on platforms because of broken lifts, unable to access a ramp to board trains, left waiting hours for accessible taxis or no accessible taxi being available, being left at bus stops because a buggy is in the spot

designated for a wheelchair or of a bus stop in a rural or semi-rural location being located on the roadside where there is no pavement to continue a journey.

IWA Recommends

IWA recommends that Galway County Development Plan enshrines a commitment to ensure collaboration with all transport service providers that will result in wheelchair accessible transport availability across all transport services – taxis, buses, and trains – public and private alongside the necessary disability specific infrastructure required for each mode of transport.

5. UNCRPD Pillar 5

Consultation and Collaboration.

Article 4 of the UNCRPD asserts that member states “shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organisations.”

People who have a disability and who ‘live the life’ are best advisers in all matters relating to the design of accessible environments, facilities and delivery of services. Real and ongoing consultation and collaboration offer great opportunities for learning in the development of sustainable designs and operational planning. Too often people with a disability have had the experience of being asked to what is set out as a consultation, only to be told of plans that have passed the point where any significant changes or inputs can be achieved.

IWA Recommends

IWA recommends that Galway County Development Plan commits to a continuing process whereby the Council fully engages and consults on the details of design within the public realm and of public buildings and in the delivery of services, with people who have a disability so that their voice is heard and taken on board throughout any project. Designers may not recognise their knowledge and experiential deficits when it comes to planning and designing for disability and consequently may not realise that these gaps must be addressed and filled through continued learning and real-life experiences that can be achieved through real consultation and continued professional development.

6. UNCRPD Pillar 6

Enterprise and Employment

Article 27 of the UNCRPD states the “Parties recognise the right of persons with disabilities to work, on an equal basis with others, this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities.”

People with disabilities are still significantly excluded from the labour market due to several social and environmental factors. National Disability Authority research shows that in the European context people with disabilities in Ireland are less likely to be in work, education and training when compared to their European peer group. “People with disabilities are only half as likely to be in employment as others of working age. The reasons for this are complex. While many employers successfully employ people with disabilities, for others, limited disability know-how and a fear of the unknown can be issues. From the individual’s side, research shows other reasons for low employment rates can include poor health, lower levels of education and skills, low expectations, fears around loss of benefits, and practical issues such as transport or work arrangements. People with greater levels of impairment are less likely to be at work. The two most important supports identified by people with disabilities who would like to work are flexible work arrangements and modified job tasks.”⁴

IWA Recommends

Under the Comprehensive Strategy for People with Disabilities (2015 – 2024), the Government has committed to increasing the public service employment target for persons with disabilities on an incremental basis from a minimum of 3% to a minimum of 6% by 2024. IWA recommends that Galway County Development Plan commits to achieving this 6% and beyond employment target within the lifetime of the County Development Plan 2022 – 2028. Additionally, Galway County Council to provide leadership to local employers in raising awareness regarding employment of people with disabilities and to demonstrate how improved environmental access, supports employment opportunities being taken up by people who have a disability.

Regularly referenced throughout the submission, *Irish Wheelchair Association Best Practice Access Guidelines* are available at <https://www.iwa.ie/downloads/about/iwa-access-guidelines.pdf> The fourth edition of the *Irish Wheelchair Association Best Practice Access Guidelines Edition 4 2020* will issue in the early Autumn.

⁴ National Disability Authority <http://nda.ie/Publications/Employment/>



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