

[REDACTED]

Sent: 09 January 2020 16:21
To: 'Laura O'Callaghan'
Subject: RE: County Development Plan Review

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review.

Mise le meas,

[REDACTED]
Planning, Development and Environment.

From: Laura O'Callaghan [REDACTED]
Sent: 09 January 2020 16:11
To: Planning - Plan Review
Subject: County Development Plan Review

Please find attached our submission to the Development Plan.

If you need any further information to support the submission, please don't hesitate to get in touch.

Kind Regards,
Laura O'Callaghan

Laura O'Callaghan
Community Development Worker
Disability Federation of Ireland
Fumbally Court
Fumbally Lane
Dublin 8

[REDACTED]
<http://www.disability-federation.ie> #MakeWayDay

Disability Federation of Ireland (DFI) is the national support organisation for voluntary disability organisations in Ireland who provide services to people with disabilities and disabling conditions. Disability Federation of Ireland, Fumbally Court, Fumbally Lane, Dublin 8. Telephone: 01 – 4547978, Fax: 01 – 4547981, Email: info@disability-federation.ie, Web: www.disability-federation.ie

Disability Federation of Ireland, is a company limited by guarantee not having share capital, registered in Dublin, Ireland with registered offices at Fumbally Court, Fumbally Lane, Dublin 8. Company Registration Number 140948, CHY No 6177.



Disability Federation of Ireland submission to Wicklow County Development Plan 2021 – 2027

Climate Change, Flooding and Coastal Zone Management

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 Wicklow 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. See Transport below.

Housing

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, 15% of people who have a disability lived in social housing compared to 10% of the general population.

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

Wicklow County Council need to work with all stakeholders to tackle the crisis and commit to an open and transparent housing allocation process for people with disabilities, based on evidence of need. Alternative and flexible housing solutions need to be explored, within the context of an ageing population, which includes people with disabilities, who want to live independently.

Among the various sub-populations of people with disabilities who need support are:

- People under 65 years old who are placed into nursing homes due to a lack of adequate social care (1400 nationally). A report published in Wicklow in 2013, identified 42 people with a range of disabilities living in nine participating nursing homes in the Bray / Greystones area of Co. Wicklow. The people were aged 27–65 years, had been living in

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

their current setting from two months to over 20 years, and had a range of nursing and support needs, with a range of diagnoses.

- 2,000 people nationally who remain in congregated settings
- Those who remain on social housing waiting lists (7,600 nationally).
- Others with disabilities who are currently living with older parents or family members. They feel options for housing which meets their needs are severely limited and remains unrepresented in the data that is available.

Locally we are advocating for Wicklow County Council to

- promote choice in living conditions for persons with disabilities
- ensure the Disability and Housing Steering Committee is effective and functions to the best standard,
- ensure representatives on the disability and Housing Steering Committee fully represent the interests of the diversity of citizens with disabilities from across the county and have a mandate and mechanism to do so,
- Work to promote and publicize the process through which housing applicants are assessed for and allocated housing,
- Ensure council members and members of the Strategic Policy Committee on housing are aware of the Disability and Housing Steering Committee and its remit,
- regularly provide updated and publicly available data regarding the number of persons with a disability on the social housing waiting list,
- create a specialized housing lists for persons with a disability and work with disability organisations, approved housing bodies, the HSE and other stakeholders to keep this up to date,
- implement all the national and local strategy plans for housing people with a Disability effectively and on time,
- work on building stronger working relationships and partnership with Housing Bodies, and the HSE,
- improve communication with housing applicants and ensure all communication is accessible and in a format that the applicant can understand. This should include information on how to make a complaint and report maintenance issues.

Economic Development and Employment

Only 24% of people who have a disability in Wicklow were at work, compared to 54% of the general population in the county (CSO, 2017).

Wicklow 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 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.

Town and Village Centres and 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.

The development of accessible multipurpose community spaces and sports 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 participate in a range of community activities, sports and clubs that they may currently be excluded from because of the inaccessibility of facilities.

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 the 14% of the population in Wicklow who have a disability and 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 and
- 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 dish 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 council should also make commitment to universal design and accessibility as a condition of planning for all developers building new public spaces. There are several areas of the county where public spaces in town centres, belonging to developers, cause difficulties for people with disabilities. Paving slabs are poorly chosen and dangerous when wet or icy, tree roots are cracking pavements and creating trip hazards and there is poor colour contrast meaning grey stone bollards or steps cannot be seen against the surrounding environment and are a threat to people with sight loss. Developers should be held to account when they are granted planning for large public spaces.

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.

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.

Tourism and Recreation

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 170million 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 seen as an accessible Tourist destination.

More than 46% of people over 60 worldwide have a disability. Older people made over 225million 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 Wicklow 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.

Wicklow County Council need to work to ensure that it's 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. Wicklow cannot continue to loose out on valuable revenue from a sizeable proportion of the market because it fails to take accessibility into account.

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 taken into account.

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.

As mentioned above, multiuse community facilities should be encouraged. 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. The Wicklow Local Sports Partnership as well as disability-specific clubs and individual disabled athletes should be supported to ensure they can continue to provide these opportunities.

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, as has already been done in Greystones recently.

Heritage

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.

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

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.

Community Development

As previously mentioned, the development of accessible multi use facilities and accessible playgrounds should be supported by Wicklow County Council.

Safe and accessible paths, cycle ways and walk ways 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.

Transportation and Infrastructure

19% of people who have a disability in Wicklow did not have access to a car or van compared to 8% of the general population at the time of the last census.

This means that almost 1 in 5 people with a disability are forced to rely on taxi's, buses and trains. In 2017, an elected representative in Wicklow highlighted the fact

that there were only 20 wheelchair accessible taxi's to be shared across the entire county. Wicklow had the fourth lowest provision in the country.

A number of bus routes in and around the county are not accessible to people with disabilities. Wicklow 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 infrastructure to safely operate wheelchair lift on buses. An audit of existing bus stops with cooperation from bus operators should be considered.

There are numerous problems with the DART and rail services in the county, which have been highlighted by disability activists before. Among these problems are the fact that

- Notice must be given to travel
- A ramp is needed to board and exit the train and staff are not always available to assist with this,
- Lifts needed to cross the platform are out of order, people cannot access their destination and are forced to return.
- Works and upgrades to stations can temporarily render them inaccessible

Wicklow 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.

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.