



Access For All, Galway

Submission to Galway City Development Plan 2023 – 2029

Introduction

Background

Access for All is a network of individuals who have lived experiences of disabilities, local disability organisations and community stakeholders, which focus on continually improving universal access of the local built environment for all people irrespective of size, age and ability, on an equal basis with others. Established in the 1990s, members of Access For All have collectively advocated for improved accessibility to public spaces through involvement in Make Way Day, Galway Social Inclusion Week, consultations with Galway City Council and businesses to ensure universal access and the provision of accessible information. Together we aim to promote the United Nations Convention on the Rights of People with Disabilities (UNCRPD) and work towards developing Galway City as a Disability Friendly City.

Context

Access for All welcomes the opportunity to submit our feedback and lived experiences to the Galway City Development Plan (GCDP) 2023-2029. Despite progress made in recent years people with disabilities still face additional challenges and barriers in both the physical realm and in areas of participation. We look to Galway City Council to embed the UNCRPD within the new Development Plan to give due strategic regard to this important human rights instrument which will be domesticated into Irish law. Like the Barcelona Declaration [Click here](#) that figures in Galway City Development Plan 2017-2023, we would like to highlight the duty that Galway City Council has in the local implementation of the UNCRPD in ensuring the full equality of disabled people in Galway City. We draw particular attention to the General Obligations of UNCRPD as well as Article 9 (Accessibility), Article 19 (Living independently and being included in the community), Article 24 (Education), Article 25

(Health), Article 27 (Work and Employment), Article 28 (Adequate standard of living) and Article 30 (Participation in cultural life).

As a signatory to The United Nations Sustainable Development Goals (SDGs) all Irish National and Local Plans are obliged to respond and incorporate the SDGs into local policies. Sustainable and disability inclusive development can only be achieved with the full participation and empowerment of disabled people. This submission draws attention to SDGs 1.4, 3, 8, 10 and 11.

Access for All recognises the need to frame this submission taking current National, Regional, Metropolitan and Local Plans into account. It is a pre-requisite of any of these plans that they are aligned with the needs and experiences of disabled people.

The National Disability Inclusion Strategy (NDIS) 2017 -2021 calls for Local Authorities to develop actions at a community level to increase the participation of disabled people in their communities and calls for all public bodies to implement universal design principles.

Galway City Council has a statutory obligation to ensure access to mainstream public services and to support access to public buildings, services and information under the Disability Act (DA)2005.

Access for All calls on Galway City Council to reflect the responsibilities it holds under Public Sector Duty (PSD), specifically as regards The Irish Human Rights and Equality Act, in the development of the GCDP 2023 - 2029.

The incorporation of standards in the UNCRPD, SDGs, EU and Irish Employment Law, current National & Local Plans, NDIS, DA and PSD benefits not only disabled people but the community at large.

Best Practice

Access for All calls on Galway City Council to embed best practice guidelines in relation to universal design, human rights and equality for the provision of all public services within the remit of the GCDP 2023 – 2029. We draw attention to the following:

- The National Disability Authority Building for Everyone: A Universal Design Approach – external environment.
- The Irish Wheelchair Association’s Best Practice Assess Guidelines: Designing Accessible Environments.
- Part M of the Building Regulations (2000) & The Technical Guidance Document M (TGD M).
- Galway City Council ensures compliance with Disability Access Certificate.
- Galway City Council, Local Community Development Committee (LCDC) Human Rights and Equality Statement.

- Galway City Public Realm Strategy.

Population Growth and Housing

GCDP Issues Paper estimates that Galway's population will begin to grow by over 50% by 2040 [Click here](#). Access for All calls for the prioritisation of disabled people in relation to the allocation of accessible social housing. In 2016, according to the last CSO figures, 13% of people in Galway city had a disability and of these 19% were in social housing. The lack of suitable and affordable housing within the current housing crisis disproportionately impacts on disabled people. Amongst the various sub-populations of people with disabilities in Galway City who need, or will require, housing support include:

- People under 65 years old who are placed into nursing homes due to a lack of adequate personal and social support packages.
- People who remain in congregated settings in Galway City.
- 183 people with disabilities who remain on Galway City Council's social housing waiting list. The mechanisms for the delivery of social housing should be attentive to identifying need for disabled people and ensure the process is accessible to all who require it.
- People with disabilities who are currently living with older parents or family members. This includes people with intellectual disabilities represented by the local group, Proactive Carers.
- Young disabled adults who have turned 18 years and over.
- People under 65 years with early onset dementia, people with addiction associated dementia like Wernicke's disease and older people with dementia-specific housing needs.
- Children and adults with autism-specific housing needs.
- People with disabling conditions from stroke, acquired brain or spinal cord injury.
- Disabled people with particular needs including more than one wheelchair user within the family unit.

Many disabled people feel that their options for housing and the supports to direct their own lives on an equal basis with others are severely limited and under-resourced. A specific sub-group includes wheelchair users who typically spend between 7-10 years on social housing waiting lists with no guaranteed timeframe of a housing offer. Disabled people can have differing needs in relation to their disabilities, so they remain unrepresented in the data that is available and part of the "hidden homeless".



DISABILITY FEDERATION OF IRELAND

DISABILITY PROFILE: GALWAY CITY¹

13% of the population of Galway City, or **10,133** people have at least one disability.

Type of Disability

People in Galway City reported having the following types of disabilities and conditions:

- 4,063** Difficulties with basic physical activities
- 3,591** Difficulty with pain, breathing, or other chronic illness/condition
- 2,350** Mental health
- 2,296** Learning Difficulty
- 1,382** Deafness or serious hearing impairment
- 993** Intellectual Disability
- 825** Blindness or a serious vision impairment

AGE

Their age profile is:

0-14	754	
15-24	1390	
25-44	2516	
45-64	2678	
65+	2795	



EDUCATION²

In 2016, only 21% of people who have a disability were in education compared to 27% of the general population in Galway City.³ For those whose education had finished:⁴

- 23%** did not progress beyond primary education compared to 19% of the general population.
- 17%** had completed upper secondary compared to 17% of the general population.
- 14%** had completed further education compared to 14% of the general population.
- 31%** had completed higher level education compared to 50% of the general population.

EMPLOYMENT

26% of people who have a disability were at work compared to 53% of the general population.

TRANSPORT

32% of people who have a disability did not have access to a car or van compared to 20% of the general population.

HOUSING

19% of people who have a disability lived in social housing compared to 12% of the general population.⁵

1. All statistics in this infographic are based on Census 2016 data from www.cso.ie, along with special tabulations requested by DFI.

2. Primary and less includes no formal education, further education includes vocational/technical certificate and advanced certificate/ completed apprenticeship, higher education includes Higher Certificate, Ordinary/Honours Bachelor, Postgraduate Diploma/Degree, and Doctorate. Data based on special tabulation from CSO and Statbank.

3. % of total education ceased and not ceased and for people aged 15 years and over.

4. Data is for highest level of education completed for people with a disability whose education has ceased.

5. People aged 15 years and over, who were renting from a Local Authority or a Voluntary Body.

www.disability-federation.ie

Economic Development, Employment & Enterprise

GCDP needs to actively reflect and protect those with disabilities within the community as equal members of society. Access for All calls for the recognition of the rights of persons with disabilities to work on an equal basis with others within the workplace with the use of reasonable accommodation under Irish and

EU law. This includes the right to the opportunity to earn a living through work which is freely chosen or accepted in an open and inclusive labour market.

- Promote quality employment opportunities and career advancement for persons with disabilities in GCC. Facilitate engagement with the education sector to identify labour market needs and further education opportunities which are accessible to disabled people.
- Promote opportunities for self-employment, social enterprises, entrepreneurship, the development of cooperatives and starting one's own business through GCC Enterprise Unit.
- Promote the provision of reasonable accommodation to persons with disabilities in the workplace.
- Engage with Galway Chamber of Commerce and other business networks to promote the employment of persons with disabilities in the private sector.



- GCDP to include measures to work with the Chamber of Commerce/ similar organisations representing commercial life in the city, to promote the viability of making reasonable adaptations to private business premises. This will enable disabled people to consume the products and services available [Click here](#)
- Provide parking near entrances for wheelchair users and other disabled employees.
- Provide access ramps at entrances so those in wheelchairs can easily enter and leave the building.
- Install at least one disabled bathroom stall in each bathroom in your office to allow those in wheelchairs access.
- Provide additional room to store a wheelchair if a disabled employee prefers to use an office chair while working.
- Incentivisation and regulation of the private sector in following universal access design principles.

- Ensure retail fronts are accessible and include the basic design systems for access to enable employers to be equal opportunity employers.

Transport & Sustainable Mobility

Access for All calls on GCC to build into the GCDP the following measures that recognise that universal design is not solely based on buildings but access to public & private transport.

- Adopt and implement a Street Hierarchy framework that places vulnerable pedestrians including disabled people at the top of pyramid.



- Recognise that shared spaces between vulnerable pedestrians and cyclists are not best practice and impact upon the safety of disabled people.
- Footpaths, dished kerbs, Zebra and all controlled road crossings must be provided and installed correctly, meeting universal design specifications including tactile surfacing.
- Footpaths in poor condition to be retrofitted as per universal design specifications.
- Footpaths widened to accommodate universal access for all including large power wheelchairs and double buggies.
- Mapping of dished kerbs to include the city and suburbs.
- Ensure corresponding dished kerbs on the opposite side of the street so disabled people are not forced to navigate on the road in traffic.
- Ensure all disabled parking bays have dished kerbs for accessibility.
- Address alternatives to steel bollards on pavements.
- Park and Stride initiatives should be accessible to disabled people.

- Access for disabled people on Inter City bus and rail transport needs significant improvement to enable the freedom of movement for disabled people in Galway City.

Built Environment & Placemaking

Access for All calls on GCDP to adhere to the principle of Universal Design as defined in the Disability Act 2005:

1. “The design and composition of an Environment so that it may be accessed, understood and used.
 - i. To the greatest possible extent,
 - ii. In the most independent and natural manner possible,
 - iii. In the widest possible range of situations, and
 - iv. Without the need for adaptation, modification, assistive devices or specialised solutions, by any persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability, and

Part M seeks to ensure that new dwellings (houses, flats and apartments) and extensions are visitable by people with disabilities. Part M aims to foster an inclusive approach to the design and construction of the built environment. All buildings should be designed and constructed so that: (a) people can safely and independently approach, gain access and use a building, its facilities and its environs, and (b) elements of the building do not constitute an undue hazard for people, especially for people with vision, hearing or mobility impairments. This is the minimum level of provision to meet requirements M1-M4. The Technical Guidance Document M (TGD M) encourages making additional provisions where practicable and appropriate to support the design philosophy of Universal Design. It also sets out the need to make material alterations to existing buildings other than dwellings to increase the accessibility and usability of existing buildings where practicable.

The Public Realm Strategy 2019 states that it will ‘promote universal design to help open up the city centre to all and make getting into and moving around the centre much easier¹ Universal design to be at the core of design for all developments and Galway City Council to go beyond promotion and include Universal Design as a requirement for all developments. The principle of Universal Design was not included in the current Issues Paper. This needs to be addressed in the development of the new plan with Universal Design included as a core part of the Built Environment and Placemaking chapter with clear

actions illustrating how the principle of Universal Design will be applied in planning.

Green Network and Biodiversity

Access for All calls on the GCDP to put in place measures that promote the health and well-being of all individuals. Disabled people generally have more health care needs and are more vulnerable to a lack of measures to enhance overall health and wellbeing.

- Targeted access measures to outdoor spaces that enhance emotional and mental health of disabled people.
- Provision of additional spaces to be allocated in existing and new neighbourhoods for Community gardens. neighbourhoods. These need to be resourced to make them accessible through universal design principles.
- Green areas in outer suburbs such as Merlin Park Woods, Terryland Forest Park and Cappagh Park be accessible for all. Walkways, signage and benches need to be at regular intervals and based on universal design principles.
- Local parks and playgrounds need to be provided in all areas and within reasonable distances. Disabled people, not all, may not have access to cars or public transport and supporting their independence and empowerment enhances their wellbeing.
- Parks and playgrounds need to be accessible and include equipment that can be used by disabled children and parents/family members of a variety of ages. The use of “Kissing Gates” in parks excludes disabled people along with parents of small children with large buggies.
- Parks need to have allocated Community Wardens to ensure they are kept clean and safe for the use of all people. This is particularly the case where glass and debris are not picked up as it places obstacles in the way of people with assistive dogs.

Climate Action

Access for All calls for the recognition of equal access to energy and the recognition and wider implications for disabled people using assistive technology. While advances in technology have the potential to improve our lives, these mechanisms for relaying information, making purchases and interacting with our communities are not necessarily accessible to everyone. People with disabilities tend to spend more time in their homes and have higher fuel and energy costs. Extreme climate events make disabled people

more vulnerable to a lack of access to basic services in addition to infectious diseases. This has been borne out in the recent Covid-19 pandemic.

- Measures in GCDP to address climate change must include Just Transition as disabled people are more likely to experience poverty and not be able to take on more costly measures to reduce the impact of climate change.
- Targeted retrofitting and energy efficient upgrading of local authority housing to prioritise disabled people.
- During localised flooding and extreme weather events disabled people are unable to leave their own homes and their independence is reduced.
- Prioritise access by disabled people to local services during climate emergencies.
- GCC to implement environmental protection legislation by annually reviewing the progress that has been made in relation to air and noise quality in Galway, it's waste management and water management.
- Provision of an energy saving plan that takes account of external sources of funding, for example SEAI, that would be of direct benefit to disabled people in lowering annual home energy costs.

Community, Culture and Education

Access for All actively participate in a number of local community structures through representation, education and awareness building. Disabled people have a right to be represented in local community, cultural and educational structures, supports and initiatives. Our participation enhances the diversity of the aforementioned and at times brings an added perspective that benefits everyone.

- Where public financial support is being provided for the administration of public events or festivals, consideration must be proven as to how organisers will address issues of accessibility. This might include the provision of Irish Sign Language or other language interpretation, adequate accessible parking, facilitating support staff or personal assistants.
- GCDP to ring fence to support access and participation by disabled people to participate not just as spectators or audience members, but as performers and contributors to Galway's vibrant cultural activities.
- The council must also recognise the important role of private actors in the provision of cultural, community and education services.

- Businesses should recognise the added cost of disability and where possible provide reasonable accommodations, such as reduced prices for admittance to events for personal assistants.
- Public awareness raising about respecting disabled people in the community is also required. The enforcement of accessible spaces is required to enable disabled people to engage in their community and culture on an equal basis with other people – whether it is a space on a bus, an accessible parking space, designated spaces within venues or attitudes and interactions with other members of the public.
- Provide lifts, stair lifts, ramps including portable ramps, and handrails in and outside buildings in the City Centre.
- Retain a variety of options for engaging with education, cultural and community services to ensure inclusion of older people, disabled people and people for whom English is not a first language.

Access for All call on GCC to include the following key recommendations in Galway City Development Plan 2023 – 2029.

- Appoint a Full-time Access Officer with the remit to recruit external to GCC.
- Develop a comprehensive Access Strategy in consultation with disability organisations.
- Resource and support a fully trained, designated Disability Specific Technical Housing Specialist as has been provided to the Age Friendly Alliance.
- GCC to follow government policy in the allocation of lands for social housing.
- Provide Disability Awareness and Public Sector Duty Training on a six-month rotation to all GCC staff.
- Carry out regular audits, in partnership with disability organisations, in the public realm and civic spaces to include both the city centre and suburbs based on the principles of universal design.
- Develop an action plan using the results of these audits which includes relevant material alterations for current infrastructure.
- Initiate a working group between GCC, disabled organisations and Galway Chamber to look at common areas of work including employment opportunities and accessibility to disabled customers.
- Engage with the private sector in accommodating the employment of disabled people and facilitating their consumer spending power in the retail sector through adaptations.

- Carry out an audit of bus stops, shelters, taxi ranks, public and private intercity bus and train stations.
- Promote Galway as a Disability Friendly City through Galway Tourism Strategy.
- Appoint a Park Warden that has as part of their role the opening of park gates to allow access by all members of the public.
- Ensure public playgrounds are accessible to children with disabilities through the provision of physical and age-appropriate play facilities.
- Community Gardens to be resourced to promote accessibility to disabled people.
- Community and arts grant to be assessed against measures to include disabled people as creators and users of community and arts activities.
- A mid-way review to be built into the GCDP and the provision for changes to be made resulting from key findings in relation to progress or lack of.