

Dear Sir/Madam,

Please see enclosed the submission from the National Disability Authority for the National Planning Framework (NPF) Pre-Draft Stage Consultation.

The National Disability Authority through its Centre for Excellence in Universal Design would like to thank the Department of Housing, Planning, Community and Local Government for the opportunity to give input and feedback on the National Planning Framework, or 'NPF'.

We work through our Centre for Excellence in Universal Design to promote the universal design of the built environment, products, services and information and communication technologies so that they can be easily accessed and used by everyone, including persons with disabilities.

The NDA would recommend that people with disabilities are included as part of the national planning framework. From the 2011 census there are now over 600,000 people with disabilities in Ireland an increase of over

200,000 from the 2006 census. People with disabilities face many additional challenges due to an inaccessible environment both in urban or rural areas. Access to transport and physical infrastructure of the country is crucial for all citizens but in particular for people with disabilities.

The NDA would also suggest from both a consultation perspective and from a design perspective that the framework considers a Universal Design (UD) approach. Universal Design is firstly an inclusive approach that enables all citizens to participate equally in the planning process and 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.

The success of the NPF will be indicated by measurement of quality of life, employment statistics and population locations. More people should be able, if they choose, to live and work outside of the major hubs and regional centres that are accessible and easy to use regardless of their age, size, ability or disability. Ireland will be a mix of rural and urban with quality physical and information technologies infrastructure working in harmony.

I would like to wish the Department of Housing, Planning, community & Local Government the very best of luck in this vital work and I hope that the text contained within the NDA's submission and the information provided will help the Department in the achievement of more effective regional development in order to ensure that positive outcomes arising from national growth can be shared by all people regardless of their age, size, ability or disability throughout Ireland and the potential of all areas to be realised, relative to their capacity for sustainable development. We would also welcome the opportunity to meet with the team before the framework is finalised.

Yours Sincerely,

On behalf of Siobhan Barron  
Director, National Disability Authority

(See attached file: National Planning Framework NDA submission 2017.pdf)

Dr Gerald Craddock  
Chief Officer

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Is le haghaidh an duine nó an eintitis ar a bhfuil sí thírithe, agus le haghaidh an duine nó an eintitis sin amháin, a bheartaítear an fhaisnéis a tarchuireadh agus féadfaidh sé go bhfuil ábhar faoi rún agus/nó faoi phribhléid inti. Toirmisctear aon athbhreithniú, atarchur nó leathadh a dhéanamh ar an bhfaisnéis seo, aon úsáid eile a bhaint aisti nó aon ghníomh a dhéanamh ar a hiontaoibh, ag daoine nó ag eintitis seachas an faigheoir beartaithe. Má fuair tú é seo trí dheardmad, téigh i dteagmháil leis an seoltóir, le do thoil, agus scrios an t-ábhar as aon ríomhaire. Is é beartas na Roinne Dlí agus Cirt agus Comhionannais, na nOifígl agus na nGníomhaireachtaí a úsáideann seirbhísí TF na Roinne seoladh ábhair cholúil a dhícheadú.

Más rud é go measann tú gur ábhar colúil atá san ábhar atá sa teachtaireacht seo is ceart duit dul i dteagmháil leis an seoltóir láithreach agus le mailminder[ag]justice.ie chomh maith.

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# Ireland 2040 Our Plan – National Planning Framework

## NDA Submission on the 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.

The National Disability Authority through its Centre for Excellence in Universal Design would like to thank the Department of Housing, Planning, Community and Local Government for the opportunity to give input and feedback on the National Planning Framework, or 'NPF'.

We work through our Centre for Excellence in Universal Design to promote the universal design of the built environment, products, services and information and communication technologies so that they can be easily accessed and used by everyone, including persons with disabilities, older persons and people of all ages and abilities.

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 guidance, resources and learning that would be helpful to the various areas covered by the framework. In this regard we would welcome an opportunity to meet and discuss these further. As a statutory agency we would be happy to play our part in ensuring the framework is effective and in its implementation.

### Summary

The NDA would recommend that universal design approach underpins the framework and all areas. As highlighted above universal design enables planning and design of the environment with regard to all citizens and others appreciating their diverse abilities whether older persons, people with disabilities, visitors to Ireland, families and those with varying abilities whether through language or otherwise.

In particular there are specific considerations for those with disabilities. The 2011 national census indicated there were over 600,000 people with disabilities in Ireland an increase of over 200,000 from the 2006 census. People with disabilities face many additional challenges due to an inaccessible environment both in urban or rural areas. Access to transport and physical infrastructure of the country is crucial for all citizens but in particular for people with disabilities. It is critical to the choices they have in life e.g. being able to get out and about, to get to work and to live independent lives. As the national policy is to move away from residential centre care to living independently

in the community it will be especially important that the planning framework can respond and support those policies.

The NDA would also suggest from both a consultation perspective and from a design perspective that the framework considers a Universal Design (UD) approach. Universal Design ensure an inclusive approach to produce effective design solutions that benefit everyone, whereby citizens are supported to engage in the planning process and enables people to fully engage in designing their own futures. Universal Design also make sure any new *building*, infrastructure, product or service is accessible, understandable and usable for all citizens.

This submission references some of the work carried out by the National Disability Authority (NDA) specifically looking at planning from a Universal Design perspective and we would be happy to guide further on other works as a relevant.

The publication ‘Building for Everyone – A Universal Design Approach: Booklet 9 Planning’ <http://universaldesign.ie/Built-Environment/Building-for-Everyone/> , *The publication provides the planning profession in Ireland with greater awareness of the value of universal design in shaping of our built and natural environment. Secondly, it provides guidance on how to deliver, promote and achieve universal design within the planning system. Finally, it demonstrates how universal design can be integrated into the planning process through careful consideration of the context and place, and well-drafted policies in conjunction with a collaborative approach to design.*

Another publication ‘How Walkable is Your Town?’ report by Age Friendly Ireland and the Centre for Excellence in Universal Design (CEUD) at the National Disability Authority on the results of Walkability Audits in 2014 <http://universaldesign.ie/Built-Environment/Urban-Design/> guides on design considerations and also the practical learning secured through an inclusive audit approach.

*This publication is based on consultation with the people who live in, and use the services of the towns and involved groups of people, walking the streets of the town to understand how easy and accessible the town is for people to get around in.*

*Key issues that people were not happy with was how the physical infrastructure of the towns was being cared for, nor with the behaviour of others in the towns. People thought the footpaths weren’t being properly maintained and repaired and, while there were dropped kerbs and ramps, these were sometimes badly designed and couldn’t be used easily. Obstacles like overgrown hedges, bins or post boxes on footpaths all made it more difficult for people to get around. People wanted more pedestrian crossings. Where there were already crossings, there needed to be simple design changes made, such as changing the timing of traffic lights so that people could cross the roads safely.*

We also published, Research on 'Universal Design of Shared Education Campuses-Key Research Findings & Recommendations 'in 2014, Centre for Excellence in Universal Design.

A key message from this research is the importance of 'the location of shared Education Campuses and its integration with the community' as a key critical element for development plans and planning as a whole in Ireland. This is very relevant to section 4.2.16 in the Framework document

**The following are suggested changes or additions that the NDA would recommend to the consultation document. Suggested text changes are in bold for ease of use.**

## Section 1 Introduction

### 1.2 NPF Consultation Process

*1.2.1 This issues and choices paper is a consultation document that has been prepared in advance of drafting a new National Planning Framework. Consultation(sic) is a critical step in the preparation and drafting of the NPF and this initial consultation seeks to prompt national debate and discussion in relation to the future spatial development of Ireland.*

The NDA appreciates the approach the Department is taking with the NPF however after consideration the NDA would suggest a more inclusive approach adopting a Universal Design process that will ensure the framework takes account of citizens. We would be happy to guide further on this having worked with local authorities on same.

## Section 2 Ireland's National Planning Challenges

*2.1.6 Bullet point Number 2: The number of people over the age of 65 will double to be well over one million;*

Suggest adding the following – the people over the age of 65 will double to be well over 1 million also the increase of over two hundred thousand people with disabilities from the 2006-2011 CSO Census to now over 600k people with disabilities from the 2011 Census. <http://nda.ie/Disability-overview/Disability-Statistics/> and <http://www.cso.ie/px/pxeirestat/Statire>SelectVarVal/saveselections.asp> .

The text below is based on NDA-CEUD research that indicates the following;

- In Ireland there's a 60% chance that a new home will be occupied by a person with some form of disability at some stage
- 87% of people in Ireland would prefer to live in their own homes and communities. (National Council for Ageing and Older People, 2009)

## 2.4 Learning from our Experience

*2.4.8 PG 14 Whilst the experience of the previous National Spatial Strategy (NSS) didn't influence the pattern of development in Ireland as intended, it provides valuable lessons for future planning at a national scale. As a result, it has become clear that it will be necessary for the National Planning Framework to:*

*Bullet 5: Address all parts of Ireland, avoid the perception of 'winners' and 'losers', but avoid unrealistically seeking to treat all parts of the Country in the same way;*

The NDA would agree with Bullet 5 – The NDA would suggest a text edit to include; 'that it is vital that all people regardless of age, size, ability or disability are involved in the guiding the strategy and planning process.'

PG 15 Where to next;

*Bullet 2: How the needs of an ageing population will be accommodated.*

NDA suggested text edit – 'Ageing population and people with disabilities in particular, should be accommodated through a universal design approach'

Bullet 6 The services and amenities (e.g. transport, housing, education, health, leisure, shopping etc.) that will be required to meet people's needs.

Suggested text edit - The services and amenities (e.g. education, health, leisure, shopping etc.) that will be required to meet **all** people's needs.

## Section 3 People's Health and Well-Being

### 3.2.1 Trends influence our health and wellbeing PG 17

*3.2.1 The built environment is an important determinant of health – directly, through air pollution, road traffic, noise, floods and climate and indirectly, through accessibility, safety, mixed land use, street design and green open spaces. How we 'make' places can have a huge influence on people's health and wellbeing.*

NDA suggested text edit 3.2.1 The built environment is an important determinant of health – directly, through air pollution, road traffic, noise, floods and climate and indirectly, through **Universal Design**, accessibility, safety, mixed landuse, street design, access to facilities, and green open spaces and spaces that encourage community integration. How we 'make' places can have a huge influence on people's health and wellbeing.

*3.2.3 Enjoyment of health is not evenly distributed in society, with the incidence of chronic conditions and accompanying lifestyle behaviours being strongly influenced by socio-economic status, levels of education, employment and housing depression.*

NDA suggested text edit 3.2.3 Enjoyment of health is not evenly distributed in society, with the incidence of chronic conditions and accompanying lifestyle behaviours being strongly influenced by socio-economic status, levels of education, employment, housing **and disability**

## **PG 21 WHERE TO NEXT**

*BULLET 5: In order to move away from ‘Business As Usual’ it will be necessary for alternatives to consider the following:*

*Support for the creation of sustainable communities that have good social interaction and networks and demonstrate resilience and a shared sense of civic pride and active participation in shaping their local environment;*

NDA Suggested text edit; Support for the creation of sustainable **and connected** communities that have good social interaction and networks and demonstrate resilience and a shared sense of civic pride and active participation in shaping their local environment;

*Bullet 7: Fostering an improved ‘quality of life’ offer for people through place-making and design that can be applied to every city, town and village in Ireland;*

NDA Suggested text edit; Fostering an improved ‘quality of life’ offer for people through place-making and **Universal** design that can be applied to every city, town and village in Ireland;

## **KEY QUESTIONS PG 22**

*BULLET 2: What policies can the NPF include to effect improvements to our general health, including physical and mental wellbeing, in Ireland over the next twenty years?*

NDA Suggest that adopting a Universal Design approach that enables all citizens to be participants in designing an environment that they can live in, feel connected to, engage with others and to be independent which is important to their own general health

## **SECTION 4 A PLACE MAKING STRATEGY**

### **KEY QUESTIONS PG 25**

*Bullet 3: Do we need to reform and strengthen administrative and governance structures so that they are capable of delivering the necessary alliances, collaboration and actions to build up our cities and their regions?*

The NDA would agree with this statement – A key catalyst to enable this reform would be adopting a Universal Design approach.

*PG 28 4.2.16 The National Strategy for Higher Education to 2030 and the National Skills Strategy 2025 include an emphasis on the need for greater regional collaboration among education and training providers and this is being advanced through the regional clusters of higher education institutions and the Regional Skills Fora which involve further education and training providers, higher education institutions and employers. The National Strategy for Higher Education also recommended the consolidation of the Institute of Technology sector and the creation of a small number of multicampus technological universities which has the potential to further strengthen higher education provision in the regions, supporting indigenous enterprise through skills development and innovation and becoming an important differentiator in attracting foreign direct investment. There is also significant potential for institutional collaboration on a North-South basis to advance crossborder regional development and strategically advance Irish higher education on an all-island basis.*

The NDA would agree with this statement. Work that the NDA through its Centre for Excellence in Universal Design has done - The ‘Universal Design of Shared Education Campuses-Key Research Findings & Recommendations’ Report states the importance of ‘the location of shared Education Campuses and its integration with the community’ as a key critical element for development plans and planning as a whole in Ireland. The NDA would see this as an important determinant for rural, urban and regional growth.

## **5.4 Heritage and Landscape PG 45**

*5.4.1 Ireland has a rich vein of heritage ranging from the iconic historic buildings and sites within our towns and cities, to the natural heritage of our countryside. The NPF is an opportunity to refocus on the sustainable and adaptive reuse of our existing and historic assets, regenerate existing areas and reduce pressure for unsustainable expansion on the edges of our settlements.*

*There is also recognition of the value of our natural heritage not only for biodiversity but also for recreation, tourism and scientific purposes.*

NDA suggested text edit: Ireland has a rich vein of heritage ranging from the iconic historic buildings and sites within our towns and cities, to the natural heritage of our countryside. The NPF is an opportunity to refocus on the sustainable and adaptive **accessible** reuse of our existing and historic assets, regenerate existing areas and reduce pressure for unsustainable expansion on the edges of our settlements.  
There is also recognition of the value of our natural heritage not only for biodiversity but also for recreation, tourism and scientific purposes.

## **KEY QUESTIONS PG46**

*Bullet 6: What measures should be implemented in order to safeguard our landscapes, seascapes and heritage and ensure that Ireland continues to be an attractive place to live, visit and work?*

NDA Suggested recommendation: The NDA has done extensive work in the area of customer engagement and tourism and adapting a Universal Design approach would be a recommendation for the NPF to consider as an approach to make Ireland the most attractive and accessible place to visit but also to live and work

## **6.0 Equipping Ireland for Future Development – Infrastructure PG 48**

*6.1.10 The provision of social infrastructure, commensurate to the location and scale of a settlement or locality, is also central to supporting sustainable vibrant communities that cater for all life stages. This is because it is apparent that development over the past twenty years has been widely dispersed, mainly outside established urban areas.*

NDA Suggested text edit: The provision of social infrastructure, commensurate to the location and scale of a settlement or locality, is also central to supporting sustainable vibrant **and accessible** communities that cater for all life stages. This is because it is apparent that development over the past twenty years has been widely dispersed, mainly outside established urban areas.

## **APPENDIX**

The Centre for Excellence in Universal Design (CEUD) was established by the National Disability Authority (NDA) in January 2007 under the Disability Act 2005. The Centre is dedicated to the principle of universal access, enabling people in Ireland to participate in a society that takes account of human difference and to interact with their environment to the best of their ability.

Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people, regardless of their age, size or disability. This includes public places in the built environment such as buildings, streets or spaces that the public have access to; products and services provided in those places; and systems that are available including information and communications technology (ICT).  
(Disability Act, 2005).