

National Disability Authority Opening Statement to the Joint Committee on Housing, Local Government and Heritage

Introduction

The National Disability Authority (NDA) thanks the Chair and the members of the Joint Committee on Housing, Local Government and Heritage for the opportunity to present on the topic of **Universal Design in new projects and public realm planning**.

The NDA incorporates a Centre for Excellence in Universal Design, promoting Universal Design in the built environment, products, services and ICT. The Centre also informs our work to provide independent and evidence-informed advice to Government on disability policy and practice.

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, ability or disability. A Universal Design approach involves a diverse range of users in the design process from an early stage. Through our work to develop guidance, policy advice, continuous professional development and award schemes, we promote universal design as an essential aspect of architectural quality.

Key statistics

The 2016 Census tells us that 13.5% of the population in Ireland had a disability, with 1 in 4 households containing at least one person with a disability. Most disability is acquired, and the majority of people aged over 80 have a disability.

The last census also tells us that 1 in 8 households had at least one child under the age of four. Universal Design in the built environment has benefits for families with young children, as well as for disabled and older people.

UN Convention on the Rights of Persons with Disabilities (UNCRPD) and National Strategies

Implementing Universal Design in the built environment is an important aspect of Ireland's commitments under the UN Convention on the Rights of Persons with Disabilities, as ratified by the State in 2018. Under Article 4(4), Ireland undertakes to promote the development of universally designed facilities, which should require the minimum possible adaptation and the least cost to meet the specific needs of a person with disabilities. The right to live in accessible communities is also articulated in Articles 9 and 19 of the Convention.

The European Accessibility Act promotes accessibility and removal of barriers, preferably through a universal design approach, to ensure access for disabled people on an equal basis with others. Universal Design is also referenced in a number of national strategies including the 2040 National Planning Framework, Housing for All, the National Housing Strategy for Disabled People and Housing Options for our Ageing Population Policy Statement.

Universal Design, Part M and Housing

Part M of the Building Regulations sets out the **minimum** requirements for access and use in new buildings, and extensions and material alterations to existing buildings. At present, the minimum requirement is for dwellings to be visitable, rather than liveable for disabled people. We welcome that a number of local authorities are setting targets in their development plans for a percentage of homes in new developments to be Universal Design Homes. However, we have advised that a review of Part M should be carried out, with priority given to Part M for Dwellings.

We are currently finalising work in conjunction with the Society of Chartered Surveyors of Ireland looking at the initial cost of building Universal Design Homes and informing a longer term cost benefit analysis. A preliminary key finding from our analysis and consultation is that the allowable floor area for dwellings is critical to enable key Universal Design features to be incorporated. At present, the target floor area for social and affordable houses is too small to allow for the achievement of the UD Home or UD Home+ levels. Some houses in the private

market are being delivered with a suitable floor area for UD Home level design, which we believe presents an opportunity for implementation. In addition, there are opportunities to achieve the UD Home level in apartments where there is a requirement for the floor area to exceed the minimum area by 10%. However, we note that Build-To-Rent apartments are exempted from this requirement¹. We have also advised that 10% of new housing stock should be designed to UD Home+, wheelchair liveable standards. We are currently working with the Irish Green Building Council to support the incorporation of Universal Design Homes into its Home Performance Index certification scheme.

Universal Design and the Public Realm

Universal Design also has application in projects in the public realm, including our shared civic spaces, to ensure that the design of these spaces does not disadvantage particular groups, or impede their access to these amenities. We have worked with disabled people to audit the walkability of individual towns, identifying gaps to inclusion and participation in how our roads and streets are built, designed and maintained. The NDA notes that the recent pandemic has led to some significant changes in how some urban spaces are laid out and accessed. In some cases, these changes have created further barriers for those with disabilities, rather than removing them. In some cases, the changes seem to have been implemented without adequate consultation or engagement with disabled people and their representative organisations, and the NDA takes this opportunity to remind the Committee that the principle of meaningful engagement is also enshrined in the UNCRPD.

Conclusion

Whether it is in the home or in the shared built environment, Universal Design can most readily be achieved when built into planning and design processes from the outset, in particular by being enshrined in our public procurement processes. Incorporating Universal Design at the start of a project is more cost effective

¹ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, Section 3.8(b)

than trying to introduce it at a later stage, and Universal Design also reduces the need for costly and wasteful retro-fitting of buildings at a later stage. It is therefore an approach that supports economic, environmental and social sustainability, a key requirement for all projects. The NDA and CEUD have produced technical guidance, Codes of Practice, and supported the development of standards, all of which can inform the Universal Design of our public spaces, public buildings and our housing. We would be happy to answer any questions you might have on our work or our advice to date.

ENDS