

Consultation on the NI Executive Draft Disability Strategy 2025 - 2035

MAG Response

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Introduction

Question 1. Please indicate whether you are responding on behalf of an organisation?

Ministerial Advisory Group, Architecture and the Built Environment for Northern Ireland

Vision

Question 2. To what extent do you agree or disagree with the vision included in the draft Disability Strategy?

Agree

Please tell us why

The Ministerial Advisory Group (MAG) welcomes the Strategy's vision of an inclusive society grounded in rights, dignity and full participation. This strongly aligns with the social and human rights models of disability articulated within the Strategy. MAG would emphasise that the realisation of this vision is fundamentally and inherently shaped by the built environment. The way in which places, buildings, streets, and infrastructure are designed will determine the degree to which 'inclusion' is actually experienced in practice. As such, we would contend that inclusive design must not be thought of as an enhancement or a specialist concern, but rather as a core component of delivering this vision across all aspects of society.

Strategy Scope

Question 3. To what extent do you agree or disagree with the scope of the Strategy?

Agree

Please provide us with any comments you have on the scope of the Strategy.

MAG supports the broad and inclusive scope of the Strategy, particularly its recognition of diverse forms of disability and the attention it draws to including neurodivergence and hidden impairments which are not always obvious. However, MAG would also note that the scope of the Strategy would also benefit from a clearer recognition of the role that is played by space and place in shaping a sense and feeling of inclusion. For example, everyday experiences such as access to services, participation in societal events, and the capability to live independently, are all mediated intrinsically through everyday engagement with the built environment. The Strategy would be strengthened by explicitly recognising the essential role played by the built environment as a cross-cutting medium that serves to underpin a range of different outcomes, rather than a longstanding (and now out-dated view) that it is primarily associated with physical accessibility issues alone.

Guiding Principles

Question 4. To what extent do you agree or disagree with the guiding principles of the Strategy?

Agree

Please provide us with any comments you have on the guiding principles of the Strategy.

MAG supports the guiding principles – in particular, the emphasis that is placed on co-design and the respect for lived experience. From a built environment perspective, these principles should be extended to ensure that Deaf and disabled people are involved at the earliest stages of the related spatial planning and design initiatives, such as (but not limited to) the formation and development of policy; planning processes; and in terms of design development for applicable buildings, spaces and infrastructures. This is essential to avoid the need to retrospectively adapt the build environment to ensure adequate provision of inclusive design considerations.

Outcomes

Question 5. To what extent do you agree or disagree with the importance of the eight outcomes included in the draft Disability Strategy?

Outcome 1

Agree

Outcome 2

Agree

Outcome 3

Agree

Outcome 4

Agree

Outcome 5

Agree

Outcome 6

Agree

Outcome 7

Agree

Outcome 8

Agree

Do you have any further comments to make on any of the outcomes listed? (Please reference the outcome)

MAG strongly supports the eight outcomes and recognises their collective importance. However, MAG would again emphasise that there is a need to recognise that the built environment provides a cross-cutting medium that enables across multiple outcomes. Whilst the built environment is directly relevant and integral to 'Outcome 2 (Built Environment & Transport)', it is also relevant to: 'Outcome 5, Independent Living', in terms of critical issues

concerning housing design and spatial access; 'Outcome 4, Culture & Leisure', in terms of accessibility to venues and through and within the wider public realm; 'Outcome 3, Services', where physical access to many goods and services remains essential to insure inclusiveness, alongside an increasing drive toward digital provision; and 'Outcome 8, Children & Young People', where educational environments must also be fully inclusive. A more integrated recognition of the built environment across these outcomes would strengthen the Strategy and support more effective and comprehensive implementation.

Outcome One

Question 6. To what extent do you agree or disagree with the eleven commitments supporting Outcome One of the draft Disability Strategy?

Commitment 1

Strongly Agree

Commitment 2

Strongly Agree

Commitment 3

Strongly Agree

Commitment 4

Strongly Agree

Commitment 5

Strongly Agree

Commitment 6

Strongly Agree

Commitment 7

Strongly Agree

Commitment 8

Strongly Agree

Commitment 9

Strongly Agree

Commitment 10

Strongly Agree

Commitment 11

Strongly Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

None

Outcome Two

Question 7. To what extent do you agree or disagree with the seven commitments supporting Outcome Two of the draft Disability Strategy?

Commitment 12

Agree

Commitment 13

Agree

Commitment 14

Agree

Commitment 15

Agree

Commitment 16

Agree

Commitment 17

Agree

Commitment 18

Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

MAG strongly welcomes the focus on accessibility and the recognition that barriers arise from how society is designed - rather than from individuals themselves. However, MAG considers that the ways in which this is currently framed risks positioning accessibility primarily as a matter of technical compliance, rather than as a core universal principle of quality spatial design and planning. There are several issues to consider:

1. The adoption of standards such as BS8300 is important and should of course be supported. However, it will be important to emphasise that these should be understood as a baseline threshold, rather than a target ambition. This would help to mitigate the risk that reliance on standards alone becomes a 'box-ticking' exercise to be able to claim that a design is inclusive. Instead, inclusive environments should be held to be holistic in their approach and design-led in their creation in order to ensure that they are the experienced inclusively in practice.
2. Accessibility should not be limited to individual buildings, but an overarching view and consideration of how movement occurs through everyday space, which includes: the streets and ancillary public realm; footpaths and crossings; transport stops, hubs and interchanges; and many variations of transitions between different types of spaces. The Strategy already identifies well-known barriers such as pavement obstructions and poor street design. These should be elevated to core design and planning issues, and not positioned as secondary considerations.
3. Inclusive design must be embedded at the highest levels of policy thinking and development and in its institutional statutory regulation, including: planning policy and development control; public procurement processes; related public project briefs, design requirements and tender specifications. This would strongly align with the Strategy's commitment to forward-planning and will also reduce the need for costly, timely, disruptive and often ineffective, retrofitting schemes.

4. MAG strongly supports the involvement of Deaf and disabled people in shaping the built environment. This should extend beyond consultation to meaningful co-design practices which ensure that an inclusive range of lived experiences directly feed into and inform strategic design decisions, spatial layouts and day-to-day operational practices.

5. MAG emphasises that many barriers to inclusivity are not immediately visible or always recognised, but are instead embedded in everyday design decisions that are often taken for granted. These 'hidden barriers' can arise from instances such as road layouts and circulation; signage and legibility spaces where there has been little forethought (such as the fringes of inner-ring roads); and more generally where decisions are made based on assumptions that suit the 'typical' or 'normal' user of a space. We understand that addressing these hidden barriers requires a significant shift where inclusive design is not a matter of compliance, but one where there is a critical reflection on how environments enable or exclude participation.

Outcome Three

Question 8. To what extent do you agree or disagree with the five commitments supporting Outcome Three of the draft Disability Strategy?

Commitment 19

Agree

Commitment 20

Agree

Commitment 21

Agree

Commitment 22

Agree

Commitment 23

Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

MAG would reiterate the need to ensure that physical access is also considered in light of the general societal move towards digital service provision.

Outcome Four

Question 9. To what extent do you agree or disagree with the four commitments supporting Outcome Four of the draft Disability Strategy?

Commitment 24

Agree

Commitment 25

Agree

Commitment 26

Agree

Commitment 27

Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

MAG welcomes the commitments to improving access to culture, leisure and sport. The accessibility of these activities is fundamentally shaped by the design of venues and the surrounding public realm – maintaining an emphasis of how they are accessed across all modes of transport. Consideration should be given not only to access into buildings, but also to the wider spatial journey involved in getting there, including: traversing and navigating the street and road networks; transport interchanges, hubs and connections; and general means of wayfinding, in order to ensure that participation is genuinely inclusive.

Outcome Five

Question 10. To what extent do you agree or disagree with the seven commitments supporting Outcome Five of the draft Disability Strategy?

Commitment 28

Agree

Commitment 29

Agree

Commitment 30

Agree

Commitment 31

Agree

Commitment 32

Agree

Commitment 33

Agree

Commitment 34

Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

MAG strongly supports the emphasis on independent living and recognises the central and fundamental role of housing. However, the Strategy's current approach relies heavily on the provision of guidance and encouraging of incremental improvement. MAG recommends that a stronger approach is required, where a focus should be placed on how these commitments are delivered. There are a number of items to consider.

1. Housing should be considered as a critical infrastructure that sits at the centre of the Strategy. The provision of accessible and adaptable housing should be understood as essential for inclusion, and not as a specialist provision.

2. MAG welcomes the proposed Inclusive Design guidance. However, as noted earlier guidance and technical compliance alone will likely not be sufficient to drive fundamental change and establish and normalise new ways of thinking. Consideration should therefore also be given to: strengthened minimum standards of compliance; practical, working integration with planning policy; and, clear and transparent mechanisms for delivery.

3. There will be a considerable need to devise and implement a widespread plan to retrofit existing housing stock. A significant proportion of Deaf and disabled people are living in existing housing that is not fit for purpose. MAG therefore recommends greater emphasis on: plans to develop and implement retrofit strategies; plans to develop and implement adaptation programmes; and plans to provide longer-term and sustainable investment in quality housing.

4. Access to suitable adequate housing is varied and uneven across Northern Ireland. The Strategy should embed a more place-based approach that recognises variations and areas of high-need. There is certainly a need for much greater focus on specific typologies of area, such as (but not limited to) rural areas and divided cross-community interface areas.

Outcome Six

Question 11. To what extent do you agree or disagree with the seven commitments supporting Outcome Six of the draft Disability Strategy?

Commitment 35

Agree

Commitment 36

Agree

Commitment 37

Agree

Commitment 38

Agree

Commitment 39

Agree

Commitment 40

Agree

Commitment 41

Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

None

Outcome Seven

Question 12. To what extent do you agree or disagree with the five commitments supporting Outcome Seven of the draft Disability Strategy?

Commitment 42

Strongly Agree

Commitment 43

Strongly Agree

Commitment 44

Strongly Agree

Commitment 45

Strongly Agree

Commitment 46

Strongly Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

None

Outcome Eight

Question 13. To what extent do you agree or disagree with the twelve commitments supporting Outcome Eight of the draft Disability Strategy?

Commitment 47

Agree

Commitment 48

Agree

Commitment 49

Agree

Commitment 50

Agree

Commitment 51

Agree

Commitment 52

Agree

Commitment 53

Agree

Commitment 54

Agree

Commitment 55

Agree

Commitment 56

Agree

Commitment 57

Agree

Commitment 58

Agree

Do you have any further comments to make on any of the commitments listed? (Please reference the commitment)

MAG notes that inclusive design of educational settings and community environments plays a critical role in supporting and enabling Deaf and disabled children and young people to participate fully in social and developmental activities. It is therefore essential that early exposure to well-designed and inclusive environments is provided. This can support independence, confidence and a much longer-term sense of societal inclusion. The inclusive design of educational settings and community environments should therefore be considered as part of a holistic and comprehensive approach to delivery of the Strategy.

Equality Impact Assessment

Question 14. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in the EQIA consultation document?

If so, what are they and can you provide details

MAG considers that spatial inequality requires greater attention. There is limited recognition of geographic variation in accessibility needs; the significant and discrete differences between urban and rural areas and the challenges that they present; and the cumulative impact of social, physical and economic barriers in areas of social and spatial disadvantage. The built

environment plays a key role in shaping these inequalities and, conversely, can also play a powerful role in bringing change. As such, these types of spatial inequalities should be more explicitly addressed within the EQIA.

Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in the EQIA Consultation document?

If so, what are they?

There is a risk that, without consistent implementation - that is backed-up by robust enforcement - the Strategy could improve accessibility significantly in some areas while allowing others to fall further behind. This would serve to reinforce and deepen existing spatial inequalities. These concerns are especially relevant to matter of rural transport provision; significant variations in the quality of housing across the region; and the differing approaches that are taken to the design of the public realm by local councils.

Please state what action you think could be taken to reduce or eliminate any adverse impacts emerging from implementation of the draft Disability Strategy.

Please provide comment on actions you think could be taken to reduce or eliminate any adverse impacts emerging from implementation of the draft Disability Strategy.

MAG recommends adopting a place-based approach to implementation that has the capability to recognise variations in current conditions, and then to focus and prioritise attention. This will require accessibility outcomes to be monitored geographically; ensuring consistency in standards and delivery across regions; and embedding inclusive design requirements within planning and procurement systems and practices.

Final Comments

Question 15. Is there anything further you'd like to add or comment on in relation to the draft Disability Strategy?

Please provide comments on anything further you'd like to add or comment on in relation to the draft Disability Strategy.

Please provide comments on anything further you'd like to add or comment on in relation to the draft Disability Strategy.:

MAG strongly supports the ambition and direction of the Disability Strategy. To maximise the impact of the Strategy, we would again emphasise that it should recognise the fundamental role played by the built environment. The built environment is not a discrete or standalone issue, but an essential one that is foundational in shaping all aspects of inclusion. We would also reiterate that inclusive environments will not emerge through compliance alone, but will require early-stage integration in policy and planning; supporting and incorporating high-quality, design-led approaches; embedding meaningful engagement with an inclusive range of lived experiences; as well as ongoing evaluation and improvement.

MAG would welcome the opportunity to support the Executive in developing guidance, informing implementation and promoting best practice in inclusive design across Northern Ireland.

Are there any other comments you would like to make in regard to the consultation process more generally?

Please provide comments you would like to make in regard to the consultation process more generally.

MAG would be keen to engage with the Executive on this matter via a workshop or discussion rather than this remaining solely a paper exercise, and can be contacted via the DfC Architecture team at magsecretariat@communities-ni.gov.uk

Dr David Coyles, MAG Member

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