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To Auckland Council

Please find attached our submission on the Draft Kaipātiki Local Parks Management Plan

Disabled Persons Assembly NZ

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# Introducing Disabled Persons Assembly

**We work on systemic change for the equity of disabled people**

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People’s Organisation run by and for disabled people.

Since our formation in 1983, DPA has brought disabled people together and shaped our collective input in a way that drives system level change.

**We recognise:**

* Māori as Tangata Whenua and [Te Tiriti o Waitangi](https://www.archives.govt.nz/discover-our-stories/the-treaty-of-waitangi) as the founding document of Aotearoa New Zealand;
* disabled people as experts on their own lives;
* the [Social Model of Disability](https://www.odi.govt.nz/guidance-and-resources/guidance-for-policy-makes/) as the guiding principle for interpreting disability and impairment;
* the [United Nations Convention on the Rights of Persons with Disabilities](https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html) as the basis for disabled people’s relationship with the State;
* the [New Zealand Disability Strategy](https://www.odi.govt.nz/nz-disability-strategy/) as Government agencies’ guide on disability issues; and
* the [Enabling Good Lives Principles](https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/) and [Whāia Te Ao Mārama: Māori Disability Action Plan](https://www.health.govt.nz/publication/whaia-te-ao-marama-2018-2022-maori-disability-action-plan) as avenues to disabled people gaining greater choice and control over their lives and supports.

**We drive systemic change through:**

**Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally

* modelling disabled leadership;
* as a member of the [Disabled People’s Organisations (DPO) Coalition](https://www.odi.govt.nz/guidance-and-resources/disabled-peoples-organisations/);
* as a member of [Disabled Peoples International](http://www.dpi.org/);
* as a member of the [Pacific Disability Forum](https://pacificdisability.org/), a member of the [International Disability Alliance](https://www.internationaldisabilityalliance.org/); and
* creating and supporting disabled-led initiatives such as [Mahi Tika – Equity in Employment](https://www.dpa.org.nz/mahitika/mahi-tika-equity-in-employment).

**Information and advice:** informing and advising on policies impacting on the lives of disabled people

* providing a channel for information between disabled people and government;
* providing advice, commentary, and submissions to Parliament, government agencies, and local authorities;
* providing advice to businesses and non-government organisations; and
* research.

**Advocacy:** supporting disabled people to have a voice, including a collective voice, in society

* listening to disabled people and identifying barriers to equity;
* engaging both nationally and regionally with our members and the wider community - disabled people, whānau, allies and organisations;
* building the capacity and capability of disabled people;
* partnering with other organisations on projects and campaigns; and
* engaging with the media.

**Monitoring:** monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people

* monitoring existing and proposed laws, policies and practices relevant to disabled people and whānau; and
* supporting government, organisations, businesses and the public to recognise, understand and address barriers to equity.

# The submission

DPA is providing this submission for the Auckland Council’s Kaipātiki Local Board in its consideration of the Draft Kaipātiki Local Parks Management Plan.

We will focus our comments on the 11.1 Access and Parking, and 11.2 Buildings sections contained in Volume 2 of the Draft Management Plan.

DPA welcomes the emphasis on accessibility contained in both sections of the plan. We strongly support the commitments made in the draft to improve accessibility to the park system for disabled people, older people and children through ensuring that features including tracks, mobility parking, and buildings are accessible and usable for everyone.

However, we make some key recommendations to improve the document so that it is clearer, especially in relation to the use of disability-related terminology.

**11.1 Access and parking**

DPA notes that Council will not be able to make all tracks fully accessible for a variety of reasons, including limited park space and the need to protect natural and cultural values, and just the pure inaccessibility of some spaces. However, DPA recommends in these situations that both the Council and local board ensure that reasonable accommodations are made so that all tracks are accessible up to the point where they would become inaccessible.

Furthermore, for every track which is not able to be fully accessible, we recommend that one or two be created/made fully accessible across their entire length to enable disabled people to have greater equity with other users in choices and opportunities to enjoy the Kaipātiki parks system. An example of this is that in late 2021, DPA engaged with Auckland Council over the inaccessibility of walking tracks in the Western Springs area and council officers agreed to make what would have been an entirely inaccessible track partially accessible for disabled people which we welcomed.

DPA also supports the proposal to create separate trails/tracks to accommodate walkers, cyclists, mountain bikers and micro mobility users. This will enable disabled people with mobility impairments, including those using wheelchairs and mobility aids, as well as blind and low vision people using canes and/or guide dogs, to navigate the park system safely without fear of colliding with cyclists or bikers.

DPA recommends that tactile strips be placed at strategic locations on all walking tracks and walkways to enable easy and safe navigation by blind and vision impaired people.

DPA welcomes the proposal under 11.1.2 (3)(c) to recognise the need for mobility parking and drop off spaces to be created. However, DPA recommends that the term ‘limited mobility’ be changed to ‘disabled people’ (and this includes wherever the term is referenced in this plan) as a wide range of people with impairments who experience disability need access to mobility parking, i.e., not just people with mobility impairment but also people who experience low energy, and older people. Blind and low vision people require easy access to drop off points as do other disabled people as well.

Similarly, when it comes to the use of disability-appropriate language, we would recommend that the terms ‘all-ability’ and ‘ability’ be deleted wherever they occur within the plan and replaced with ‘disability’ or ‘disabled people.’ DPA believes that the terms ‘disabled', and ‘disability’ better reflect the way that many disabled people see themselves in that we are disabled by the physical, environmental and attitudinal barriers placed in our way by the wider society around us. The use of such euphemistic terms as ‘all-ability’, ‘differently abled’, etcetera, effectively deny the impact of disablism on our society, and this includes in spaces like our parks system.

 **11.2 Buildings**

DPA welcomes the recognition that the provision of supporting infrastructure in parks, including buildings, is crucial to supporting the people who choose to spend time within the Kaipātiki Park system. To this end, we support the statement that when considering proposed buildings or upgrading existing ones that the local board will bear in mind ‘... the design and location of buildings and structures to support accessibility, shared-use, public safety, and environmentally and financially sustainable outcomes and maintenance costs.’

Therefore, DPA supports the proposal contained in Policy 11.2.2(d)(iii) that in considering the placement of new buildings within the park system that the use of universal design will be one of the factors to be taken into consideration. If universal design is used in any new and/or upgraded buildings, this will enable everyone, including disabled people, the ability to use park buildings for recreational, sporting, accommodation and other purposes on the same basis as non-disabled people.

DPA recommends that Section 11.2.2(1) be further strengthened through deleting the words ‘should consider’ to ‘must consider’, thereby changing the relevant sentence to ‘*Where buildings are proposed to be located on parks, including replacements, the assessment must consider the authorisation approach in section 12.1 and the following ...’* This change would mean that the board and relevant council officers would have to consider, rather than just potentially consider, the placement or replacement of buildings according to environmental and universal design considerations.

**Collaborate in discussions on park changes and design**

DPA wishes to be involved in any further discussions on the Kaipātiki Local Parks alongside other disability organisations/stakeholders.

# DPA’s recommendations

The Disabled Person’s Assembly recommends:

* **Recommendation 1:** Thatboth the Council and local board ensure that reasonable accommodations are made so that all tracks are accessible up to the point where it would become inaccessible or inappropriate for them to continue being so. Furthermore, for every track which is not able to be fully accessible, we recommend that one or two be created/made fully accessible across their entire length to enable disabled people to have greater equity with other users in choices and opportunities to enjoy the Kaipātiki parks system.
* **Recommendation 2:** That tactile strips be placed at strategic locations on walking tracks and walkways to enable easy and safe navigation by blind and vision impaired people.
* **Recommendation 3:** Thatunder 11.1.2 (3)(c) the term ‘limited mobility’ be changed to ‘disabled people’ (and this includes wherever this term is referenced in the plan), as a wide range of people with impairments who experience disability need access to mobility parking, i.e., not just people with mobility impairment but also people who experience low energy, and older people.
* **Recommendation 4:** That the terms ‘all-ability’ and ‘ability’ be similarly deleted wherever they have been placed within the plan and replaced with ‘disability’ or ‘disabled people.’
* **Recommendation 5:** That Section 11.2.2(1) be strengthened through deleting the words ‘should consider’ to ‘must consider’, thereby changing the relevant sentence to ‘*Where buildings are proposed to be located on parks, including replacements, the assessment must consider the authorisation approach in section 12.1 and the following ..*.’
* **Recommendation 6:** ThatDPA wishes to be involved in any further discussions on the Kaipātiki Local Parks alongside other disability organisations/stakeholders.