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To Auckland Council

Please find attached our submission on the Draft Ōrākei 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.

**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/), [Whāia Te Ao Mārama: Māori Disability Action Plan](https://www.health.govt.nz/publication/whaia-te-ao-marama-2018-2022-maori-disability-action-plan), and [Faiva Ora: National Pasifika Disability Disability Plan](https://www.moh.govt.nz/notebook/nbbooks.nsf/0/5E544A3A23BEAECDCC2580FE007F7518/$file/faiva-ora-2016-2021-national-pasifika-disability-plan-feb17.pdf) 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.

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

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

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

# **The submission**

DPA is providing this submission for the benefit of the Ōrākei Local Board in its deliberations on the Draft Ōrākei Local Parks Plan.

We focus our comments on the 11.1 Access and Parking, and 11.2 Buildings sections contained in Volume 1 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 do have some 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 Ōrākei 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 notes the proposal to enable more connections to the Ōrākei parks system for people who either cycle or use micromobility solutions such as, for example, scooters.

However, as the draft plan recognises, this can create tension between cyclists and micromobility users and other people who access the parks system via foot or by disabled people using wheelchairs and mobility aids, as well as blind and low vision people using canes and/or guide dogs to navigate, deaf and hard of hearing people who may not hear micromobility users coming up behind them, children who may move unpredictably and so on.

DPA, therefore, recommends that for any shared tracks, there be safety measures put in place including, good clear signage and the placement of parallel tracks for both walking pedestrians/mobility aid users and cyclists/micromobility users, to provide safety for both cyclists and pedestrians.

DPA also 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 chronic fatigue and older people. Blind and low vision people require easy access to drop off points as do other disabled people as well.

**Disability Appropriate language**

DPA recommends 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 ourselves in that we are disabled by the physical, environmental and attitudinal barriers placed in our way by the wider society around us. For these reasons we ask that these documents not use euphemistic terms as ‘all-ability’, ‘differently abled’, and so on.

**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 Ōrākei Parks 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.’

DPA notes 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. This is an important step in the right direction as adoption of universal design for all new and/or upgraded buildings, 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 Ōrākei 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 on shared tracks, there be safety measures put in place including, for example, good clear signage and the placement of parallel tracks for both walking pedestrians/mobility aid users and cyclists/micromobility users, to provide safety for both cyclists and pedestrians.
* **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),
* **Recommendation 4:** that the terms ‘all-ability’ and ‘ability’ be 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 Ōrākei Local Parks alongside other disability organisations/stakeholders.