January 2022

To Dunedin City Council

Please find attached DPA’s submission to the Dunedin City Council on ‘Our Coast, Our Community’ St Clair – St Kilda Coastal Plan

Disabled Persons Assembly NZ

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**Introducing Disabled Persons Assembly NZ**

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person’s organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

* telling our stories and identifying systemic barriers
* developing and advocating for solutions
* celebrating innovation and good practice

**The submission**

DPA welcomes the opportunity to submit on the ‘Our Coast, Our Community’ St Clair-St Kilda Coastal Plan.

The United Nations Convention on the Rights of Persons with disabilities (UNCRPD) Articles most relevant to our submission are:

* Article 4.3 Involving disabled people and our organisations in decisions that affect us
* Article 5: Equality and non-discrimination
* Article 7: Children with disabilities
* Article 9: Accessibility
* Article 19: Living independently and being included in the community
* Article 20: Personal mobility
* Article 30: Participation in cultural life, recreation, leisure and sport [[1]](#footnote-1)

The New Zealand Government policies and strategies which are relevant to this submission are as follows:

 New Zealand Disability Strategy 2016-2026:

* Outcome 5 – Accessibility

DPA is pleased to see that the Council has engaged in extensive consultations (including, initially, with DPA) on this project. We acknowledge the Council’s recognition of the importance of accessibility to the coastline, in order to uphold the right of disabled people to be able to access the coastline, including to its beaches and other spaces, on the same basis as others as it seeks to plan for the eventualities of climate change-driven sea level rise.

We are also pleased to see that there will be further engagement around the specifics of putting this plan into effect with the community and key stakeholders.

This submission will focus on some of the specific aspects that we would like to see given greater emphasis as part of the plan. While the draft plan has incorporated some disability community input, it is also evident that other perspectives have been missed including those of blind and vision impaired people and older people, amongst others. Therefore, our recommendation is for all impairment-based groups which constitute the disability community to be involved in this process through DPA as well as the Access for All Group of which it is a member.

**DPA’s recommendations**

**Recommendation 1:**  DPA strongly recommends that Objective 4 be fully supported in terms of Council’s desire to create connected, accessible public spaces along the coastline and encouraging their use in safe and appropriate ways.

**Recommendation 2:**  DPA strongly recommends that Objective 5 around the need to align the plan within relevant policies and plans and the desire to support implementation with the uptake of emerging and innovative best practices. In this respect, we would like to see emerging and innovative best practises around accessibility and the universal design of structures (including natural ones) incorporated into any future action and/or coastal management plans which flow from this plan.

**Recommendation 3:**DPA welcomes the recognition within the plan that multiple access points be created and that these need to be fully accessible to pushchairs, wheelchair and mobility aid (i.e., walker) users. To facilitate this there is a need to consider the placement of accessible mobility parking and transport options along the coastal area so that everyone can easily access it. We are however, concerned that the needs of blind and low vision people appear to have been overlooked in this document, in that, for example, there will be a need to have tactile strips placed around footpath and walking track boundaries to enable safe navigation.

**Recommendation 4:** DPA welcomes the Council’s intention to consult with the community around key decision points in relation to significant coastal management actions or policy change. In this regard, we are keen for there to be further engagement, on a co-design basis, between the DCC and local disability community with a particular focus on involving DPA as well as other locally based disabled persons organisations including, for example, People First, Deaf Aotearoa, Blind Citizens Network Otago and Muscular Dystrophy in this process. DPA and many disabled people, DPOs and other access stakeholders are involved in the Access for All Group which meets monthly and should be fully involved alongside the Council’s Disability Issues Advisory Group (DIAG) in this process going forward.

**Conclusion**

DPA welcomes the general principles informing this draft coastal plan. The Dunedin City Council should ensure that disabled people and their representative organisations are included in the planning process going forward as full co-design partners. We look forward to seeing progress made on this plan but in a way which ensures universal access for everyone to the natural wonders and features of the St Kilda – St Clair coastline as it begins undergoing the most significant natural change it has experienced for over two centuries.

1. United Nations. (2006). Convention on the Rights of Persons with Disabilities. *Treaty Series*, *2515*, 3 <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html> [↑](#footnote-ref-1)