May 2023

To Hamilton City Council

Please find attached DPA’s submission on Bolmuir Park/Forest Lake School Playground

For any further inquiries, please contact:

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**Introducing Disabled Persons Assembly NZ**

**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/%24file/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 keen to take up this opportunity to engage with the Hamilton City Council on the new Bolmuir School/Forest Lake School Nature Playground design proposal.

As it stands DPA is disappointed in the proposal due to the design and the use of woodchip bark surfacing on the park as they both make it inaccessible to disabled children and adults.

Our local members are also very concerned about the safety elements of the park.

While DPA supports tamariki/children having the option of immersive nature play given that it can teach vital lessons about the need to care for our environment, this choice is being effectively denied to disabled children and adults.

In this submission, we outline our main concerns and make recommendations around how to make the park more accessible, safer and inclusive for everyone, including disabled people.

**Use of bark makes playground inaccessible and dangerous**

DPA asks that woodchip bark not be used as a playground surface material. We are concerned that the lessons of Hammond Park which has a bark surface, after its opening last year have not been learnt.

DPA notes that the opening of Hammond Park was poorly received by the public as evidenced by the adverse social media comment it attracted.

Bark surfaces are inaccessible for disabled people to navigate, especially for wheelchair and mobility aid users as well as blind and vision impaired people.

Parks should be places where both disabled parents who bring their children to the park and disabled children accompanied by whanau/family members can easily access and move around.

DPA is concerned about the safety aspect of using bark as well.

The use of bark on playground surfaces has the potential to cause injury to both children and adults and is especially problematic for disabled children and adults.

Bark surfaces can also cause allergic reactions and other complications for people who have long term health conditions and illnesses.

For all the above reasons, DPA asks that the Bolmuir Park/Forest Lake School Nature Playground be covered by rubber surfacing (or another safer alternative) instead of bark.

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| **Recommendation 1:** that bark not be used as a playground surface material on any HCC playgrounds and that safer, accessible alternatives are used instead. |

**Need for universal design in playgrounds**

The Bolmuir Park/Forest Lake School Nature Playground, should be designed and built to universal design standards so that all tamariki/children are able to navigate and play.

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| **Recommendation 2:** that playground equipment, which is universally designed, inclusive, safe and usable with features including sufficient width, space and elevation, be installed at Bolmuir Park/Forest Lake School Nature Playground. |

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| **Recommendation 3:** that the nature theme of the playground be retained as a key design element but adapted to incorporate that universal design principles and play equipment. |

**Need for disabled people to be involved as co-design partners in playground project**

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| **Recommendation 5:** DPA recommends that disabled people, accessibility auditors and our organisations, including the Hamilton Disabled People’s Forum, be involved as co-design partners in the design of the playground. |