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To Wellington City Council

# Please find attached DPA’s submission on Te Whai Oranga Pōneke – Draft Open Space and Recreation Strategy

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.

**United Nations Convention on the Rights of Persons with Disabilities**

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),1 a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention.

There are a number of UNCRPD articles particularly relevant to this submission, including:

* **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**

**New Zealand Disability Strategy 2016-2026**

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy2 to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

* **Outcome 5 – Accessibility**

# The Submission

DPA welcomes the opportunity to submit on Te Whai Oranga Pōneke – Draft Open Space and Recreation Strategy.

DPA is pleased to see that many of the recommendations we made in our submission on the Wellington City Council’s (WCC’s) Draft Recreation and Open Spaces Policy in 2022 have been picked up in this document.

These included making Wellington’s recreational and open spaces, plans and programmes more inclusive, accessible, and equitable, the need to drive universal design, taking an equity approach to reducing the barriers to participation in active recreation and sport, and empowering diverse communities to feel safe and comfortable using spaces, places and programmes.

We acknowledge the Strategy’s inclusion of statistics which illustrate the lower proportion of adult disabled people who participate in any activity as being 16% less than that for non-disabled people.

This Strategy is vital if these statistics are to be turned around in any meaningful way, especially within the Wellington City area.

DPA hopes this Strategy will set an example for other local authorities to follow throughout Aotearoa in the recreational and open space activity area.

Our submission discusses the strategic focuses, especially those around integration, inclusion and diversity from a disability perspective. As part of this discussion, we make recommendations around how each of these focuses can be enhanced.

**Principles**

DPA supports the key principles underpinning the draft strategy: Tiakitanga, Whanaungatanga, Pārekareka, and Wairuatanga.

These talk about the need to preserve stewardship of Wellington’s recreational and open spaces, interpersonal connection, people’s ability to have fun and recreate and the requirement to respect the spirituality (mana and mauri) of the sea, land and air as everyone does so.

The ability to protect, preserve and make all our open and recreational spaces accessible are important principles to everyone, including disabled people.

**Strategic Focuses**

DPA commends Council for including the strategic focuses that it has in the draft strategy given how relevant they are to disabled people and other marginalised groups.

We are pleased to see that the WCC recognises the right of everyone, including disabled people, to engage in recreational and sporting activities within their communities. However, we make several recommendations for each of them.

1. **Pāhekoheko (Integrated):** DPA welcomes the approaches outlined in this section including the need to optimise open spaces and facilities and for greater multi-functionality. This will help address the issues faced by many individuals and community groups as to where they can accessibly, safely and inclusively recreate and/or engage in sport.

Provision of well-distributed and connected recreational opportunities is something that we also welcome as it will ensure a fair and even distribution of recreational and sporting opportunities across all communities, especially for people in lower socioeconomic communities which include a high proportion of disabled and older people within them.

**Recommendation 1:** that lower socioeconomic areas are prioritised for the development of new recreational and sporting facilities and the modernisation of existing ones, with a focus on strengthening accessibility.

We also support the need to grow the open space network to ensure that everyone is within easy distance of a recreational or social open space whether this be playgrounds, walking tracks or parks.

**Recommendation 2**: that disabled people and local disability organisations are involved in the process of determining the creation of new open space options as well as maintenance priorities for existing ones.

**Recommendation 3:** that the Open Space Provision Targets take account of the needs of disabled people and other marginalised groups in terms of measuring how easily both disabled and other communities can access them.

DPA supports quieter streets being used as recreation and nature spaces. The proposal to open streets as a means of supporting greater wellbeing rather than just having them serve as vehicular thoroughfares is an excellent idea.

**Recommendation 4:** that accessibility, inclusivity and safety elements be important considerations within any policy relating to the development, creation and maintenance of quieter streets.

**Recommendation 5:** that guidelines be published for the benefit of residents and community groups on how to safely and enjoyably create and use quieter streets for recreational and natural purposes.

1. **Whai Wāhitanga (Inclusive):** DPA welcomes Council’s commitment to provide inclusive, equitable and accessible spaces, places and programmes that make everyone feel safe and welcome.

These are pivotal considerations if disabled people are to be involved in the full spectrum of recreational and sporting activities in the Wellington community.

DPA praises the Strategy for its inclusion of the need to drive universal design. We welcome the commitment to engage in co-design with the disabled community to ensure input on accessibility issues around physical access, sensory and other design features to ensure that everyone can use and enjoy open spaces and recreational facilities whether it’s through the provision of toilets, mobility parking, use of Braille or designing accessible recreational programmes.

DPA is pleased to see the commitment to provide accessibility information online and in different mediums including Braille, New Zealand Sign Language, Large Print, Easy Read, audio and visual formats around open space and recreational options.

DPA supports the Council’s commitment to taking an equity approach to reducing barriers to active recreation and sport. We also support Council’s need to do so through recognising that people and communities have different levels of advantage and that different approaches are needed to obtain equal access for all. We support and endorse the idea that facilities and programmes are affordable for users and continue to be free of charge whenever possible.

Another concept in the plan that DPA endorses is taking an equity approach to increasing greening. Given that a significant number of disabled people reside in lower socio-economic areas which tend to have fewer green spaces and vegetation cover, any moves to ensure that there are more green spaces created in these areas would be most welcome.

DPA supports the need to empower our diverse communities to feel safe and comfortable using spaces, places and programmes.

Under this section, we welcome the call to apply crime prevention through environmental design principles (CPTED) to the city’s open spaces and facilities. DPA would like to point out that it is not only women, girls, our rainbow community and young people who feel at risk when using spaces but also disabled people who are at higher risk of becoming victims of violent attacks and other crimes.

One area we do welcome the Council’s commitment is the embedding of play in all the city’s spaces and places and not just playgrounds. However, on the topic of playgrounds, we have made several submissions to the WCC on various playgrounds and especially on their lack of accessible equipment, including within proposed new playgrounds.

**Recommendation 6:** that all Wellington playgrounds become inclusive playgrounds, designed and built to universal design principles.

DPA notes the commitment by Council to invest in public toilets and changing rooms, recognising that they are an essential public infrastructure.

**Recommendation 7:** that all public toilets and changing rooms be designed and constructed according to universal design principles with provision for wet floor showers, railed toilets, good lighting and secure storage facilities for clothing and valuables.

1. **Kanorau (Diverse):** DPA welcomes Council’s recognition of the need to recognise the diversity of people who recreate and use open spaces.

DPA welcomes an equity approach being taken in supporting diverse recreational and sporting activities. We believe that this will benefit disabled people’s sporting and recreational programmes, including those run by organisations like Paralympics New Zealand, Special Olympics New Zealand and other disability-based sporting organisations.

DPA welcomes the proposal to support diverse recreation clubs and organisations to thrive. DPA recommends as part of these efforts that Council prioritises disability sporting and recreational organisations to receive greater support, recognition and funding from Council.

DPA supports the need to ensure that all Wellingtonians have diverse opportunities to connect with nature. We note the inclusion of the nature pyramid concept which ranks people’s connections with nature from being daily (in the form of going walking/wheeling around their neighbourhood to enjoy sunshine, nature and fresh air) through to annual, long duration experiences of going on holidays in the wilderness.

**Recommendation 8:** that Council supports, promotes, recognises and funds opportunities for all Wellingtonians to engage with nature, especially for disabled people and other marginalised population groups and removes barriers to doing so wherever possible.

**DPA’s Recommendations**

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