May 2024

**Tēnā koutou ki te Kaunihera o Tamakimakaurau**

Please find attached DPA’s submission on Auckland Council Shoreline Adaptation Plans: Pākiri to Mathesons Bay, Ti Point to Sandspit and Snells Beach to Ōrewa.

For any further inquiries, please contact:

Patti Poa

Policy Advisor - Auckland

Disabled Persons Assembly New Zealand

Email: policy@dpa.org.nz

**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:**

* **Rangatiratanga / Leadership**: reflecting the collective voice of disabled people, locally, nationally and internationally.
* **Pārongo me te tohutohu / Information and advice**: informing and advising on policies impacting on the lives of disabled people.
* **Kōkiri / Advocacy**: supporting disabled people to have a voice, including a collective voice, in society.
* **Aroturuki / Monitoring**: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

**UN 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 3 – General principles**
* **Article 9 – Accessibility**
* **Article 11 – Situations of risk and humanitarian emergencies**
* **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 this opportunity to give feedback on the Shoreline Adaptation Plans: Pākiri to Mathesons Bay, Ti Point to Sandspit and Snells Beach to Ōrewa.

Nature is core to the wellbeing of all people and is critical in keeping us emotionally, psychologically and physically healthy.[[1]](#footnote-2) Disabled people value access to our coasts as its beneficial for our mental health[[2]](#footnote-3). In addition to this, Māori disabled connect to the whenua through whakapapa[[3]](#footnote-4) which places an extra value on its importance. It is important to remember these things when understanding community values and connections to the coast.

# With an increasing number of disabled and older people, it is why all Councils should plan and invest in the development of fully accessible, inclusive communities. Navigating shorelines and coastlines can be difficult or even impossible for many disabled people. It is important for Council as part of its shoreline adaptation plans to ensure that accessible places and spaces are created that can include disabled people.

# Climate change disproportionately impacts disabled people and older people. Nevertheless, disabled people could also make an impact on how this is tackled through acting as agents of social change by identifying areas of importance to our communities.

DPA has made submissions requesting greater clarification on what is being planned around accessibility. In this submission, we reiterate the recommendations for accessibility improvements we have made for other shorelines, especially in areas which will need to be changed to manage potential coastal erosion, inundation and flooding events.

DPA would like to see a greater emphasis on providing accessibility in and around the shorelines to ensure that everyone can access these areas. There is also a need for all new buildings or developments to be designed with an accessibility lens based on universal design principles[[4]](#footnote-5).

Our submission picks up on points made on this subject in the past with specific reference to the Pākiri to Mathesons Bay, Ti Point to Sandspit and Snells Beach to Ōrewa shorelines.

**Areas for improvement**

Should any assets and facilities, such as public toilets, public buildings and other facilities need to be moved to shift them away from vulnerable areas then there is a prime opportunity for them to have accessibility improvements made and/or new facilities constructed that meet universal design standards.

Also, if any areas are being reclaimed and turned into wetland and stream bank-based parks or new beachfronts, then again, this presents an opportunity for these areas to be designed and built along universal design principles as well. This means they would incorporate, for example, appropriately designed walkways with features including accessible signage, accessible toilets, height adjustable seating and user-friendly tables, quiet spaces, and tactile strips to enable safe navigation for blind and low vision people.

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| **Recommendation 1:** that all facilities in and around the coastal shoreline be upgraded and/or built to universal design principles. |

The Shoreline adaptation plan strategies identifies that some assets or uses (like footpaths, sports fields and carparks) may need to be moved to manage potential risks. As mentioned above, facilities need to be upgraded or built to universal design, but it is also important to remind those specialists involved in the process about Council’s commitment to universal design.

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| **Recommendation 2:** thatCouncil ensures that the architects, landscape designers, engineering consultants, project management companies, placemaking agencies and infrastructure companies they work with are reminded of Council’s commitment to universal design. |

DPA notes that any changes to coastlines should incorporate entry and exit points to places such as beaches and parks which can be accessed by everyone including disabled people and especially wheelchair and mobility aid users, blind and low vision people and older people.

This can be done, for example, through the placement of sufficient mobility parking spaces, drop off points for mobility vans and service vehicles, the placement of tactile strips on and around key areas, the creation of landing points where people can rest (especially if the entry or exit is steeply sloped) and the creation of suitable footpaths and walkways down into beach and coastal areas.

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| **Recommendation 3:** that accessible entry and exit points be created throughout the coastline area. |

As part of this process, DPA would like to see beach mats and other wheelchair and mobility aid friendly surfaces provided to ensure that disabled people can navigate successfully and safely access beaches and coastlines.

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| **Recommendation 4:** that accessibility features including beach mats and other assistive equipment be placed at beaches across the area. |

As climate change is now a significant threat and with disabled people being one of the most significantly impacted groups due to it, there may be a need for either building or other activity to be restricted in specific areas and the possibility of managed retreat needs to be factored in.

If either managed retreat and/or building restrictions are proposed along any part of the area covered by this plan, DPA would like to see any engagement around this specifically prioritise disabled people as one of the key population groups (amongst others) to be consulted with.

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| **Recommendation 5:** that disabled people be prioritised as a key population group for consultation on any managed retreat and building restrictions associated with climate change-based risks. |

As part of the civil defence and emergency management planning process for this area, which will be largely focused around dealing with climate change related emergencies and given the experiences of some disabled people during the Auckland flooding events in early 2023 that the needs of disabled people be prioritised and that any civil defence and emergency management plans involve disabled people as a key co-design stakeholder group.

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| **Recommendation 6:** that disabled people be prioritised as a key stakeholder group for emergency planning and civil defence purposes across all the coastline area. |

As the needs of disabled people differ from person to person and from area to area, it is important that people in the specific areas are consulted on their accessibility needs.

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| **Recommendation 7:** that local disabled people and disability organisations be involved in planning out the future of the Pākiri to Mathesons Bay, Ti Point to Sandspit and Snells Beach to Ōrewa shorelines and communities. |

1. Mental Health Foundation UK. (2021) *How connecting with nature benefits our mental health*. <https://www.mentalhealth.org.uk/sites/default/files/2022-06/MHAW21-Nature-research-report.pdf> [↑](#footnote-ref-2)
2. Mental Health Foundation NZ. (2018). *Survey shows strong link between time spent in nature and positive mental health*. (<https://mentalhealth.org.nz/news/post/survey-shows-strong-link-between-time-spent-in-nature-and-positive-mental-health> [↑](#footnote-ref-3)
3. Jones, B., King, P. T., Baker, G., Nikora, L. W., Hickey, H., Perry, M., … Ingham, T. R. (2024). Karanga rua, karanga maha: Māori with lived experience of disability self-determining their own identities. *Kōtuitui: New Zealand Journal of Social Sciences Online*, *19*(1), 45–64. <https://doi.org/10.1080/1177083X.2023.2224422> [↑](#footnote-ref-4)
4. Auckland Design Manual website is undergoing redevelopment, so alternative websites are - <https://www.lifemark.co.nz/news/need-universal-design/> and <https://www.branz.co.nz/universal-design/> [↑](#footnote-ref-5)