October 2024

**To Dunedin City Council**

Please find attached our submission on the Draft Town Belt Reserve Management Plan

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:**

**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.

## 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]](#footnote-2) 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.

The following UNCRPD articles are particularly relevant to this submission:

* **Article 9 - Accessibility**

# The Submission

DPA welcomes the opportunity to feedback on the Draft Dunedin City Council (DCC) Town Belt Reserve Management Plan.

DPA recognises the value that reserves have for both people and the environment.

All reserves should be accessible to disabled people so that we can enjoy them on the same basis as non-disabled people do. Our view is that the best way to achieve this is through making accessibility improvements to existing reserves.

DPA acknowledges that in the DCC’s Reserves Management General Policy that access for disabled people to amenities such as toilets and mobility parks are recognised.

We also welcome the statement in the draft plan that the Council will look for opportunities to improve access for ‘[people with] all levels of mobility providing for and enabling enjoyment and participation of recreational activities within the Reserve.’

However, DPA would like to see the wording of objective 6.13 (page 41) made much clearer in that ‘all levels of mobility’ specifically refers to disabled people.

While acknowledging that improving accessibility is an important objective, there is a need for clarity, and we provide guidance around how 6.13 can be re-worded below:

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| **Recommendation 1:** 6.13: ‘Look for opportunities to improve access for disabled people, including people with mobility impairments, blind and low vision people and older people to recreational activities within the Reserve.’  |

We also note the use of language like ‘accessibility parking’ at various points within the document. DPA recommends that this should be changed to ‘mobility parking’ to ensure that the correct term for these types of car parks is used to avoid any confusion.

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| **Recommendation 2:** that accessible parking spaces are referred to as ‘mobility parking spaces’. |

In this submission we make general comments and recommendations around how to improve accessibility across the Town Belt Reserve area, a location that attracts both locals and tourists alike to recreate, live, work and play in.

We also recognise the cultural, economic, social and environmental significance of the area to both mana whenua and tauiwi who reside within the Town Belt area and those outside of it who have either current or historical ties to it.

## Recreation and Access

DPA supports the principles that all reserves should be open to the public and be used for the specific purpose they were designated for, i.e., as a playground, sports field, or walkway.

Principally, public access should be equitably available to everyone, including disabled people.

However, we recognise that there will sometimes be reasonable limitations to this given that, for example, all walking tracks on reserves may not be able to be made fully accessible, particularly for people with mobility impairments who use wheelchairs or other mobility devices.

In these situations, the DCC should make every effort to ensure that reasonable accommodation is achieved by making tracks even partially accessible where full accessibility is not possible through, for example, making them accessible up to points where they are no longer deemed to be safe and/or accessible for everyone.

On these and other matters pertaining to accessibility, including around making supporting amenities like, for example, toilets and picnic tables accessible, council should involve disabled people and disability organisations as full stakeholders in any discussions around improving and maintaining accessibility both within and to public reserves.

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| **Recommendation 3:** that disabled people and disability organisations be involved by Council as full stakeholders in all discussions relating to the accessibility of its reserves. |

We note several proposals in this reserve management plan around improving public accessibility in the following areas including:

* Review of Moana Pool facilities where disabled people have been engaged in discussions around accessibility.
* The Beverley Begg Observatory where there has been some dialogue between the Dunedin Astronomical Society and barrier free auditors around the accessibility of their proposed toilet.
* The proposal for more mobility parking in the vicinity of Woodhaugh Gardens.

DPA welcomes all the above proposals and notes the current involvement of disabled people in discussions around the first two proposals and the need to do so on the third.

## Maintenance and asset management

DPA acknowledges the impact that climate change will have on the Town Belt Reserve area going forward.

If new infrastructure such as walkways or walkway extensions and footpaths are proposed then these need to be built in a way that respects the environment while enabling access for everyone, including disabled people.

The building of accessible toilets and changing places needs to be considered as well, especially in commonly use places such as recreational reserves and sports fields/parks.

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| **Recommendation 4:** that new infrastructure including any walkways, footpaths or walkway extensions, changing rooms/toilets and other facilities are built with both accessibility and environmental considerations including climate change in mind. |
| **Recommendation 5:** that accessible toilets and changing places need to included especially in high use spaces. |

1. <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities> [↑](#footnote-ref-2)