November 2022

To Auckland Council

Please find attached DPA’s submission on the Draft Upper Harbour Local Parks Management Plan

Disabled Persons Assembly NZ

Contact:

**Chris Ford**

**Regional Policy Advisor**

**027 696 0872**

**chris.ford@dpa.org.nz**

# **Introducing Disabled Persons Assembly**

**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.

Since our formation in 1983, DPA has brought disabled people together and shaped our collective input in a way that drives system level change.

**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/) and [Whāia Te Ao Mārama: Māori Disability Action Plan](https://www.health.govt.nz/publication/whaia-te-ao-marama-2018-2022-maori-disability-action-plan) 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 providing this submission for the benefit of the Upper Harbour Community Board of the Auckland Council in its consideration of the Upper Harbour Local Parks Management Plan.

We will focus our comments on the 10.1 Access and Parking, and 10.2 Buildings sections contained in Volume 1 of the Draft Management Plan.

DPA welcomes the emphasis on accessibility contained in both sections of the plan. We strongly support the board’s commitments made in the draft to increase the use and enjoyment of the park system for disabled people, older people and children through ensuring that features including tracks, mobility parking, and buildings are accessible and usable for everyone.

Before delving into the submission, we would like to make some comments around the use of disability-appropriate language. We recommend that the terms ‘all-ability’ and ‘ability’ be deleted wherever they occur within the plan and replaced with ‘disability’ or ‘disabled people.’ DPA believes that the terms ‘disabled', and ‘disability’ better reflect the way that many disabled people see themselves in that we are disabled by the physical, environmental and attitudinal barriers placed in our way by the wider society around us. The use of such euphemistic terms as ‘all-ability’, ‘differently abled’, etcetera, effectively deny the impact of disablism on our society, and this includes in spaces like our parks system.

**10.1 Access and parking**

As stated above, DPA is pleased that the board is wanting to encourage more use of the park system by disabled people, older people and young children through reducing barriers within the park system. We note the board’s admission that due to important natural, historical or cultural park values needing to be respected, and the steep nature of some parks themselves, that fully accessible paths will not be able to be placed in every park.

DPA recommends, though, under proposed policy 10.1.2(1)(c) which states that ‘design which is easily accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability’ that one or two tracks be created/made fully accessible across their entire length to enable disabled people to have greater equity with other users in the choices and opportunities to enjoy the Upper Harbour parks system. An example of this is that in late 2021, DPA engaged with Auckland Council over the inaccessibility of walking tracks in the Western Springs area and council officers agreed to make what would have been an entirely inaccessible track partially accessible for disabled people which we welcomed. We would also recommend the deletion of the term ‘ability’ in the above policy.

DPA also welcomes the acknowledgement that people use different transport modes to reach parks, including, for example, electric bikes, scooters or segways and other micromobility vehicles which can compete with pedestrians. The risks posed by these modes of transport need to be well and safely managed within the park system as disabled and older people who mobilise, for example, using wheelchairs, mobility aids, as well as through guide and assistance dogs can be adversely impacted by having to share space with non-disabled people using these transport modes.

Therefore, DPA welcomes the insertion of proposed policy 10.1.2(a) which stipulates that in renewing or developing park infrastructure that ‘catering for multiple forms of active transport, micromobility solutions and all-ability access while managing conflicts between different modes of transport,’ is imperative. Nonetheless, DPA recommends that the wording in this policy is amended to delete the word ‘all-ability’, and to also ensure that safety is highlighted so that it reads: … *‘catering for multiple forms of active transport, micromobility solutions and access while safely managing conflicts between different modes of transport.*’

On the issues of car parking and managing parking spaces, DPA is supportive of the need to retain or add mobility parking spaces and drop off points in any public area. In this regard, we welcome the board’s commitment under policy 10.1.2(3)(d) to continue to provide accessible parking and/or drop off spaces, something which is vitally important for disabled people who choose to access the park via private vehicles.

However, we do understand that the number and availability of parking spaces will need to be restricted to align with the park system’s values and environmental considerations. DPA recommends that when considering the limited number of vehicle parks that will need to be created and/or upgraded, that mobility parking and drop off points be considered a high priority, especially in areas where, for example, fully accessible walking tracks and amenities are located.

DPA supports the intent of proposed policy 10.1.2(5)(g) that access to a park or an area of a park may be re-routed if there are concerns around public safety, including the need to prevent conflicts between pedestrians and users of micromobility solutions. This would ensure that disabled people who use wheelchairs, mobility aids, canes, guide and assistance dogs are not placed at unnecessary risk when using the park system.

**10.2 Buildings**

DPA highly commends the board for recognising with proposed policy 10.2.2(d)(iii) the importance of incorporating universal design into any assessment to be conducted for all new and retrofitted buildings within the park system.

To this extent, we recommend when undertaking building assessments that relevant external assessors, including universal design architects and disabled people qualified in barrier free auditing, be contracted to undertake them and that the policy be amended accordingly to recognise this.

**Need to collaborate in discussions on park changes and design**

DPA wishes to be involved in any further discussions on the Kaipātiki Local Parks alongside other disability organisations/stakeholders. This includes around any changes to parks including those which could impact on accessibility.

**DPA’s recommendations**

The Disabled Person’s Assembly recommends:

* **Recommendation 1:** That the terms ‘all-ability’ and ‘ability’ be deleted in the plan and replaced with ‘disability’ or ‘disabled people.’
* **Recommendation 2:** Under proposed policy 10.1.2(1)(c) which states that ‘design which is easily accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability’ add that one or two tracks be created/made fully accessible across their entire length to enable disabled people to have greater equity with other users in the choices and opportunities to enjoy the Upper Harbour parks system.
* **Recommendation 3:** That the wording in proposed policy 10.1.2(a) is amended to delete the word ‘all-ability’, and to also ensure that safety is highlighted so that it reads: … *‘catering for multiple forms of active transport, micromobility solutions and access while safely managing conflicts between different modes of transport.*’
* **Recommendation 4:** That creating mobility parking and drop off points be considered a high priority, especially in areas where, for example, fully accessible walking tracks and amenities are located.
* **Recommendation 5**: When undertaking building assessments that relevant external assessors, including universal design architects and disabled people qualified in barrier free auditing, be contracted to undertake them and that the policy be amended accordingly to recognise this.
* **Recommendation 6:** DPA wishes to be involved in any further discussions on the Kaipātiki Local Parks plans alongside other disability organisations/stakeholders.