August 2023

To Wellington City Council

Please find attached DPA’s submission on Te Awe Māpara – Draft Wellington Community Facilities 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:**

* **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.

**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 19 – Living independently and being included in the community**
* **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 feedback on Te Awe Māpara: Wellington Community Facilities Plan.

DPA acknowledges the Wellington City Council’s (WCC’s) admission that not all facilities are accessible or culturally friendly. For our disabled community, accessibility is a major focus.

We also support the need for Wellington’s community facilities to be upgraded and/or modernised to meet the diverse needs of the city’s many communities, including its disabled community, growing population and need to address environmental concerns including climate change.

DPA welcomes the finding as well that community facilities are not equitably distributed across its many communities in a fair way, with a high number being disproportionately located in higher and middle-income suburbs than in lower socioeconomic ones.

Disabled people tend to be disproportionately concentrated in lower socioeconomic areas and we would welcome any moves that sought to address the lack of community facilities under these plans including halls, playgrounds, community rooms, toilets, libraries, etc.

In this submission, we will be concentrating on providing feedback around the sections regarding where we are heading; what we are going to do; next steps and action plan.

DPA Wellington members contributed to this submission.

# Where we are heading

DPA supports the general direction of the proposed mission and outcomes within the document which focus around promoting and developing thriving and accessible community facilities under the principles of manaakitanga, whanaungatanga, pārekareka, pāhekokotanga, and tiakitanga.

DPA is specifically supportive of the key mission to make all facilities accessible through having, as the draft plan states, a ‘well-distributed network of facilities which everyone can access with ease and dignity.’

The need to have facilities which everyone can access with ease and dignity is important for disabled people who want the ability to use facilities on an equitable basis alongside non-disabled people. It is not good when, for example, disabled people must enter facilities through the back entrance rather than through the front entrance due to accessibility barriers.

We also acknowledge on page 18 the more specific reference to disability within the context of providing accessibility for everyone in our community.

# What we are going to do

DPA supports the concept of facilitating greater collaboration between facilities, especially if they offer complementary or similar services and activities.

DPA supports actions which will enable this to happen including developing resources to support collaboration between facilities and evolving facilities use so that it creates more opportunities for a stable and cohesive network to develop.

The various collaborative models including community hubs, co-located precincts, shared facilities, partnership facilities, hub and spoke and managed collaborations (amongst others) are all great ideas.

However, DPA believes that all decisions around facility configuration need to be made in partnership with affected communities.

DPA welcomes and supports the Council’s plan to adhere to Universal Design (UD) principles in the building and re-development of community facilities. We recognise the WCC’s recognition that all community facilities should have (at a minimum) accessible toilets, suitable lighting (low lighting), quiet/low noise spaces, mobility parking, accessible wayfinding signage, visual and audio fire alarms, widened doorways, corridors and outside pathways, accessible food preparation and dining facilities and other features which are important to disabled people.

In larger facilities, like at swimming pools, gyms and recreational centres there would be wet floor shower and Changing Places style changing/showering areas, accessible equipment, plus all the other features we described above.

We support the Council’s plans to engage and involve disabled people in these changes and to undertake accessibility audits within all existing buildings as part of this process.

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| **Recommendation 1:** that DPA supports the WCC’s plan to make all community facilities fully accessible using Universal Design (UD) principles. |

We also support other ideas contained in this section around promoting the joint delivery of programmes to community groups including children, older people, youth and disabled people.

We note the importance in the plan of increasing the marketing and promotion of community facilities.

DPA believes that information about all council-owned and controlled community facilities should be available in accessible formats including Braille, Large Print, Easy Read, New Zealand Sign Language and audio.

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| **Recommendation 2:** that all information and promotional material on community facilities be available in accessible formats including Braille, Large Print, Easy Read, New Zealand Sign Language and audio. |

Facility booking processes need to be made easier too, including for disabled people and this should form part of any accessibility audit of existing buildings to be undertaken as part of this plan with any barriers in booking processes identified and then addressed in partnership with disabled people and disability organisations.

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| **Recommendation 3:** that all facility booking processes and procedures be audited as part of overall accessibility auditing processes with any accessibility barriers in booking processes identified and removed. |

DPA welcomes the recognition of the need for all community facilities to be accessible to public transport connections permitting people who drive, bus, cycle, mobility scoot or use micromobility devices to be able to access community facilities more easily.

We would like to point out one important aspect (as we have in many of our past submissions) that micromobility devices are a cause of great concern to many disabled and older people for safety reasons.

DPA emphasises that any cycle and micromobility device storage areas are safely placed outside of community facilities and that all micromobility users and cyclists are not permitted to use their devices/cycles on either footpaths or other open spaces directly outside community facilities.

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| **Recommendation 4:** that all cycle and micromobility vehicle storage facilities are safely placed outside of community facilities and that all micromobility users and cyclists are not permitted to use their devices on footpaths or other open spaces directly outside community facilities. |

DPA supports many of the proposed delivery improvements outlined on page 45 of the draft plan.

DPA particularly notes the proposal to investigate the provision of staff and volunteer training to improve the inclusiveness of community facilities, such as in working with disabled people and rainbow communities.

DPA welcomes this proposal, but we believe that each of these proposals (including around disability responsiveness) should not just be investigated but implemented as policy under the final plan.

We believe this as one of our Wellington members brought to our attention the following example of why disability responsiveness training is needed for all staff and volunteers within community facilities:

*“I tried to get a response from WCC about the fact a disabled man was told he was unable to have a support person with him in a WCC pool giving him directions. Any response we make needs to point out that staff education and culture are important. [All] staff need awareness training.”*

Under Section 4.4.2 of the plan – Paearu Aronga Tōmua - DPA welcomes the very high priorities accorded to the concepts of accessibility, inclusivity and increasing participation as being important criterion when considering the development and/or re-development of community facilities.

Each of these interlinked components – accessibility, inclusivity and increasing participation - are important to disabled people and other marginalised groups in our community who desire the ability to more greatly involve themselves in the life of the wider community.

We are also pleased to see that disabled people will be involved in all decisions pertaining to the accessibility of community facilities. This accords with the UNCRPD’s general principles around the need to involve disabled people and our organisations in all decisions relating to us.

# Next steps and action plan

We will consider the final two sections of the plan together as one.

While we have emphasised how pleased we are with the general direction and tenor of the draft plan, there are several areas which need to be significantly addressed to make the plan an even better one not only for disabled people but for all Wellingtonians.

The first centres on the lack of accessibility actions listed on page 82. We do support all actions listed for implementation on this page. However, they appear to be few and could be further bolstered through the addition of all the recommendations we have made throughout this submission with associated measurement targets added.

We would also recommend the addition of more accessibility actions after dialogue with disabled people and disability organisations.

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| **Recommendation 5:** that more accessibility actions be added for implementation within the facilities plan after dialogue with disabled people and disability organisations. |

In this respect, according to one of our members, a key area which needs to be addressed is the number of Changing Places facilities in the Wellington City area. While it is positive that at least one facility is being planned for Inglewood Place, only providing two new facilities in seven years is not adequate to meet the demand there is for them.

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| **Recommendation 6:** that more Changing Places facilities are added throughout Wellington under the plan following consultation with disabled people and disability organisations. |

DPA also recommends that an action be added for the WCC to consider selling buildings which are found to be inaccessible to disabled people or are unable to be modified to make them so provided that full community consultation processes are followed.

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| **Recommendation 7:** that the WCC consider selling buildings which are inaccessible to disabled people or are unable to modified to make them compliant. |