

# Wellington City Council Accessibility Advisory Group

Submission on:

## Building Seismic Performance Consultation Document



Prepared on: 6 March 2013

*In association with*

**Absolutely**

**POSITIVELY**

ME HEKE KI PŌNEKE  
WELLINGTON CITY COUNCIL **Wellington**

## **The Accessibility Advisory Group's Background**

The role of the Accessibility Advisory Group (AAG) is to raise awareness and understanding of accessibility issues. Our goal is to ensure that Wellington remains an accessible city, which is useable by everyone - regardless of ability. We represent the perspective of the wider community, specifically with regard to the needs or concerns expressed by those with impairments.

Our submission responds to the recommendation by the Royal Commission to "amend the Building Act to enable local authorities to issue building consents for strengthening works, without triggering the Building Act rule to upgrade the building to comply 'as nearly as reasonably practicable' with current Building Code requirements for access and facilities for people with disabilities".

The AAG has very grave concerns that the Royal Commission has considered decoupling as an option. We are strongly opposed to the decoupling recommendation.

### **Q21: Are current requirements to upgrade buildings to "as nearly as reasonably practicable" to Building Code fire and disabled access requirements a disincentive or a barrier to owners planning to earthquake-strengthen existing buildings?**

AAG response: Improved accessibility will result in more people, regardless of age or ability, being able to use a building. As one in five New Zealanders have some form of disability/impairment, it makes good social and economic sense to improve the access of as many buildings as possible. It is a lack of understanding of the benefits of being more accessible that makes this appear a barrier when it is in fact an opportunity to make a building more usable and subsequently more profitable. When viewed in this way, the requirement to upgrade accessibility could be perceived to be an incentive to building owners, not a disincentive.

#### **Accessibility means**

*Environments, information and buildings that are accessible and usable by everyone in the community. This includes: the able bodied, people pushing strollers, the elderly and people with impairments or disabilities.*

**Q22: Should local authorities be able to grant building consents for earthquake strengthening without triggering the requirement to upgrade the building towards Building Code fire escape and disabled access and facilities requirements?**

AAG response: No, the N.Z. Building Act already allows discretion where it is not “reasonably practicable” to upgrade a building to fire escape and disabled access requirements. This should continue to be the exception not the norm. Local authorities should not be given the opportunity to disregard what has already been established as an essential need, not just a “nice to have”.

**Q23: Should any change apply to both fire escape and disabled access and facilities requirements, or disabled access and facilities requirements only, i.e. retain the current fire escape upgrade requirements?**

AAG response: Any changes should apply to both fire escape and disabled access and facilities requirements as they are both equally important in ensuring that our buildings are safe and sustainable in the future.

Denying access and facilities for people with disabilities /impairments is a breach of the U.N. Convention on the Rights of Persons with Disabilities. New Zealand ratified the Convention in September, 2008. It is the right of all people to be treated fairly and equally to ensure, among other things, that all people can be safe and protected from harm.

Denying access and facilities for people with disabilities/impairments is also out of line with the New Zealand Disability Strategy, which provides “a framework to ensure that government departments and agencies consider disabled people before making decisions”. The aim of the Strategy is for New Zealand to become a more inclusive society.

The AAG has worked with the Wellington City Council, and other stakeholders, to establish the “Accessible Wellington Action Plan 2012-2015 – Promoting Inclusion”. It is our aim for the city to be accessible, safe and easy to get around. This includes access to the built environment to eliminate barriers to participation.

*Individuals are not disabled. They have impairments. It's the environment we live in, which creates disability.*

## **Q24: What would be the costs and other implications of de-linking earthquake strengthening from current Building Code fire and disabled access requirements?**

AAG response: There would be substantial social and economic costs to New Zealand by de-linking these 2 requirements from one another.

As N.Z. has an aging population, and thus a trend towards more people with impairments, we risk isolating a large proportion of our population from buildings that are earthquake strengthened but do not meet disabled access requirements. Surely we owe it to future generations to future proof our buildings rather than having to knock them down in the future to make them accessible for the people who need to use them.

We believe that isolated examples of local authorities making poor judgement calls on “as reasonably practicable” has created a fear and reluctance in the industry to be proactive when it comes to disabled access requirements. The cost of compliance must be relative to the cost of the overall project. There are many ways accessibility can be improved at low cost.

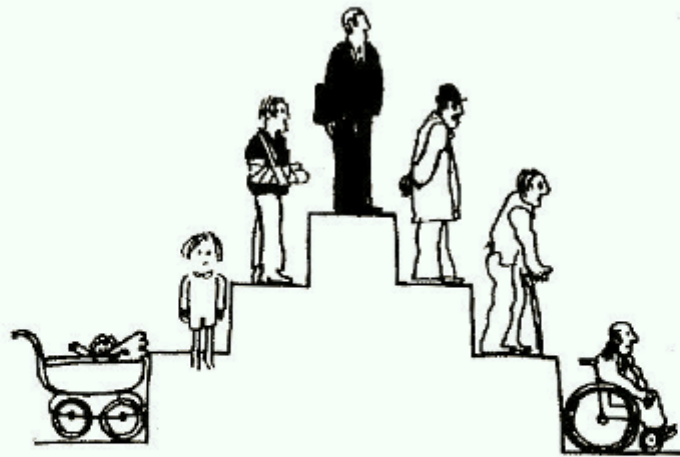
Some typical low cost, quick wins for accessibility include:

- Installing informative, locational and directional signage in easy to read lettering on contrasting background
- Adding an accessible (lower) section to existing public counters to allow wheelchair users to see over counter and to use eftpos machines
- Adjusting the timers on automatic sliding doors to be longer ie 5 seconds to allow time for those with impaired mobility to navigate through the door
- Installing handrails for stairs, access ramps and toilets
- Replacing single isolated steps/thresholds with either a small ramp or up-stand
- Installing contrasting nosings on stairs and contrasting flooring at changes of level
- Relocating accessible car parks to more appropriate locations closer to destination
- Installing new kerb ramps allowing a smoother transition from footpath to road
- Relocating pot plants, rubbish bins, stored supplies, etc, which currently obstruct doors, lift controls, bathrooms

*20% of New Zealand's population identifies themselves as having some form of disability, and with our aging population this figure is only going to grow in the coming years.*

## Closing Notes

Disability can be either permanent or temporary and everyone will experience disability at some point in their lives. We urge you consider our recommendations and comments above, for the sake of all New Zealanders and our future generations.



Everyone is functionally impaired at some stage of their life

Image courtesy of the BFNZT