November 2024

**Tēnā koutou ki te Kaunihera o Tāmaki Makaurau**

Please find attached DPA’s submission on the Auckland Council Development Contributions Policy 2025

## Disabled Persons Assembly NZ

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# 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.

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.

# The submission

**Introduction**

DPA welcomes the opportunity to engage with Auckland Council on the Development Contributions Policy 2025.

Council investment in new assets with developers would be positive from an accessibility standpoint as building new facilities means that they can be designed and constructed to universal design principles.

However, DPA recommends that Auckland Council focus on providing equity of service for disabled people across all services.

**Accessibility lens on policy**

DPA highlights the need for an accessibility lens on developments.

Auckland Council needs to work with developers on universal design as outlined in the updated Auckland Design Manual[[1]](#footnote-2), developed as part of the Auckland Disability Action Plan.

DPA has previously mentioned that accessibility advisors conduct disability impact assessments developed by Auckland Council’s Disability Reference Panel which leads to our first recommendation.

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| **Recommendation 1:** that Council advise developers on accessibility advisors disability impact assessments. |

**Auckland City disability statistics**

According to the Office of Disability Issues, 1 in 4 New Zealanders have a physical, sensory, learning, mental health or other disability.[[2]](#footnote-3) In Statistics New Zealand’s 2013 Disability Survey, Auckland recorded a disability population rate of 19 percent meaning that there were approximately 331,000 disabled people living in the city at that time.[[3]](#footnote-4) [[4]](#footnote-5)

The increasing number of disabled and older people is why all councils should plan and invest in the development of fully accessible, inclusive communities.

**Developers and ratepayers’ contributions**

Statistics show that disabled people are predominantly low-income earners.[[5]](#footnote-6)

In the discussion document, Council raised the subject of developers versus ratepayers’ contributions being equitable in terms of a return on investment to ratepayers. Disabled people are ratepayers as either home owners or tenants.

Statistics from Ministry of Housing noted that 56.5% of disabled people were living in an owner-occupied dwelling, however reports from Donald Beasley Institute specialising in disability research highlight disabled community faced significant challenges when trying to access the housing market as tenants or as buyers.[[6]](#footnote-7) [[7]](#footnote-8)

For disabled people who are fortunate enough to own their own homes, there is the issue of facing high rates bills imposed as part of council’s austerity measures. In addition to this, the need to pay higher rates comes on top of ongoing increases in the cost-of-living which are further exacerbated by high disability related living costs, for example, the need for additional electricity.

This means that for disabled people and other low-income homeowners, there is more need than ever for the availability of rates rebates to be more widely promoted and in accessible ways.

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| **Recommendation 2:** that Council provide accessible information about rates rebates and in accessible ways. |

**Equity for disabled people**

There is a lack of equity of access for disabled people to Council services and projects as well. Some priority areas for disabled people mentioned in the policy document are:

* Affordable, accessible, active public transport including essential road safety, walking and cycling improvements.
* Building and sustaining accessible, connected communities where everyone can live without barriers to their participation in terms of good housing, infrastructure, community facilities and parks.
* Enabling the participation of disabled people in the economic life of the city as workers, consumers and entrepreneurs.
* Ensuring that the voices of disabled people can be heard in all decisions, especially those that impact on our disabled communities across Tāmaki Makaurau Auckland.
* Developing a climate resilient, environmentally friendly city that can withstand the challenges of climate change and contribute to its reversal.

**Priority for investment areas**

The prioritising of investments in greenfield and brownfield areas for the assets listed below needs to be considered through taking a ‘whole journey’ approach when it comes to improving access for everyone, including disabled people. These new developments need to be well-connected to public transport, within easy wheelable/walkable distances and have facilities that meet robust Lifemark[[8]](#footnote-9) universal design standards.

These assets include:

* transport, footpaths, roads and intersections
* parks, park facilities and sports grounds
* drainage and stormwater systems
* community facilities

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| **Recommendation 3:** that Council contract and consult Lifemark or similar providers specialising in universal design standards and provide these contacts to developers |

The provision of public transport services is important for disabled Aucklanders in terms of their ability to undertake social connection, inclusion and participation in their communities. The Auckland Transport Accessibility Action Plan[[9]](#footnote-10) aims to make the city’s transport network fully accessible for everyone, including disabled people.

From our perspective, the development of active transport modes is important, including for disabled people as many of Auckland’s disabled community are either walking or wheelchair/mobility device using pedestrians and need to mobilise safely. At this point, we want to reiterate the need for any walking, cycling or micromobility connections to be placed separately but parallel to one another for safety reasons.

In the transport safety space, there is a need for Council to continue investing in other road safety measures which benefit everyone, including disabled people, such as raised pedestrian crossings.

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| **Recommendation 4:** thatCouncil inform key development stakeholders including architects, landscape designers, engineering consultants, project management companies, placemaking agencies and infrastructure companies of Council’s commitment to universal design. |

**Climate Change, Natural Hazards and Disabled People**

DPA advocates for climate resilient solutions and want Council to ensure that the developers that they contract are committed to sustainable practices who support appropriate development within sustainable environmental limits to protect the health, wellbeing, and economic opportunities of the disability community in Aotearoa New Zealand.

DPA opposed the Fast-track Approvals Bill as it disproportionately favoured large scale development with long lasting impacts, which will have far-reaching adverse implications for Aotearoa New Zealand’s environment. It risks locking in an infrastructure that is inaccessible and unsafe for disabled people.

Our environment is already degraded from decades of inappropriate development and unsustainable practices and is also facing major risks from climate change and the cumulative effects of existing land and resource use. We need to restore and protect what we have left, instead of finding ways to further degrade it.

Disabled people are one of the groups most at risk from climate change[[10]](#footnote-11) and natural hazards. Many examples exist of disabled people being highly impacted by urban planning failing to provide for the impact of climate change and natural hazards occurring across low-lying communities in Aotearoa New Zealand.

There is a need for all decision makers to take steps to uphold wellbeing of our disabled community who are affected by natural disasters. Adverse weather events also cause substantial infrastructure damage including to roading, so further erosion with the introduction of any mining companies or property developers reduces our climate resilience. The impact that weather-enforced homelessness has had on disabled people is further exacerbated by the lack of accessible housing.

DPA also asks that all decision-making bodies be required to consider the needs of disabled people and that engagement processes be required to consult with disabled people and their representative organisations.

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| **Recommendation 5:** that disabled people can have input into the decision-making processes of development projects that impact on our health and wellbeing.  |
| **Recommendation 6:** that the impact of climate change and natural hazards is fully accounted for when considering development projects.  |
| **Recommendation 7:** thatall decision-making bodies be required to consider the needs of disabled people and that disabled people’s organisations are involved as co-design partners in all projects. |

1. Auckland Council. (n.d.). *Auckland Design Manual*. <https://www.aucklanddesignmanual.co.nz/en/design-guidance/universal-design.html> [↑](#footnote-ref-2)
2. Office of Disability Issues. (n.d.). *Key facts about disability in New Zealand.* <https://www.odi.govt.nz/home/about-disability/key-facts-about-disability-in-new-zealand/> [↑](#footnote-ref-3)
3. Statistics NZ Disability survey: 2013. <https://www.stats.govt.nz/information-releases/disability-survey-2013> [↑](#footnote-ref-4)
4. Statistics NZ Subnational population estimates (RC, SA2), by age and sex, at 30 June 1996-2023 (2023 Boundaries). <https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979> [↑](#footnote-ref-5)
5. Figure.NZ. (n.d.) *Median weekly income for disabled people in New Zealand* *2017 Q2–2023 Q2* <https://figure.nz/chart/pXcWorfm74PV07bu> [↑](#footnote-ref-6)
6. Donald Beasley Institute. (2020). Housing for Disabled People: Family/Whānau and Close Supporter Perspectives. [Monitoring Report]. New Zealand Disabled People’s Organisations Coalition. <https://www.donaldbeasley.org.nz/assets/publications/uncrpd/Housing-for-Disabled-People-Family-Whanau-and-Close-Supporter-Perspectives.pdf> [↑](#footnote-ref-7)
7. Donald Beasley Institute. (2020). My Experiences, My Rights: A Monitoring Report on Disabled Person’s Experience of Housing in Aotearoa New Zealand. [Easy Read Monitoring Report]. New Zealand

Disabled People’s Organisation Coalition. <https://www.donaldbeasley.org.nz/assets/projects/UNCRPD/My-Experiences-My-Rights-A-Monitoring-Report-on-Disabled-Persons-Experience-of-Housing-in-Aotearoa-New-Zealand/My-Experiences-My-Rights-A-Monitoring-Report-on-Disabled-Persons-Experience-of-Housing-in-Aotearoa-New-Zealand.pdf> [↑](#footnote-ref-8)
8. Lifemark. (2024, 26 Sep). *Mātāwai: Future Focussed, Supportive and Universally Designed Public Housing* <https://www.lifemark.co.nz/about-us/news/article/te-m%C4%81t%C4%81wai-future-focussed-supportive-and-universally-designed-public-housing> [↑](#footnote-ref-9)
9. Auckland Transport. (2022, 12 Apr). *Accessibility Action Plan - Delivering a transport system which meets the needs of all Aucklanders Version 3: 202 2 - 2024* <https://at.govt.nz/media/1989002/accessibility-action-plan-2022-24.pdf> [↑](#footnote-ref-10)
10. Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from <https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report>. [↑](#footnote-ref-11)