March 2024

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

Please find attached DPA’s submission on Long-Term Plan 2024-34

## 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

 **1. Introduction**

DPA welcomes the opportunity to engage with Auckland Council on the Long-Term Plan 2024 - 2034.

We last engaged with the Auckland Council over the 2023/24 Budget process. Our Auckland members were disappointed that some of the proposed cuts went through but were relieved that some did not, including to the Citizens Advice Bureau (CAB) and essential services.

On top of this has come the post-Covid cost of living crisis that has impacted both Aotearoa and global economies. This crisis has impacted on all disabled people, the majority of whom live on low incomes in this country.[[1]](#footnote-2)

In the wake of these events DPA urges Auckland Council to focus on providing equity of service for disabled people across all services. This means that core services must be maintained and are accessible for disabled people.

**a) Accessibility considerations not clearly visible**

DPA is concerned that accessibility appears to be largely invisible within the current document.

This large-scale absence of a disability lens is disappointing given the existence of the Auckland Disability Action Plan and Auckland Council Disability Reference Panel.

This is why DPA’s submission focuses on running a disability/accessibility lens over the LTP and our recommendations reflect this.

We also note the absence of the required LTP assessments on Māori and climate impact as we understand these are currently being prepared and will not be available until May.

We would like to see these crucial Māori and climate assessments of both LTPs and annual plans be available at the same time as the main documents themselves. We recommend that these impact assessments be released as part of all future LTPs and annual plans - not weeks afterwards.

DPA also recommends that all future LTPs and annual plans contain a disability impact assessment developed in partnership with Auckland Council’s Disability Advisory Panel.

This would give both the city’s disabled community and Council governance and officers an overview of the impacts future city budgets and plans will have on disabled residents.

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| **Recommendation 1:** that future assessments of the impact of each LTP and annual plan on Māori and the climate are released as part of all future LTPs and annual plans - not afterwards. |
| **Recommendation 2:** that future LTP and annual plans contain disability impact assessments developed in partnership with the Council’s Disability Advisory Panel. |

**b) Disability demographics**

According to Statistics New Zealand’s 2013 Disability Survey, Auckland had a disability population rate of 19 percent.[[2]](#footnote-3)

If the 2013 disability population numbers are overlain with the estimated 2023 total Auckland population of 1,739,300, then there at least 330,467 disabled people currently residing within the city’s boundaries.[[3]](#footnote-4)

This number is set to increase even further as the population ages as there is a strong correlation between ageing and disability.

According to Auckland Council’s own figures (originating from Statistics New Zealand’s 2018 Census), 189,177 residents were aged 65 years, comprising 12.0 percent of the total population.[[4]](#footnote-5)

This number is set to rise exponentially as Statistics New Zealand is forecasting that there will be 1,000,000 plus people aged 65 years and over living in Aotearoa by 2028.[[5]](#footnote-6)

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

**c) Equity for disabled people must be provided for**

Currently there is not equity of access for disabled people to Council services and projects. Whichever funding option is chosen, there must be more investment in the following priorities which are important to Auckland’s disabled community:

* 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.
* Developing a climate resilient, environmentally friendly city that can withstand the challenges of climate change and contribute to its reversal.
* Enabling the participation of disabled people in the economic life of the city as workers, consumers and entrepreneurs.
* Enabling the participation of disabled people in the artistic, cultural, sporting, recreational and social life of the city.
* Ensuring that the voices of disabled people can be heard in all decisions, especially those that impact on our disabled communities across Tāmaki Makaurau.

The rest of our submission centres upon each of the key areas of the plan:

* Transport
* Water
* Parks and community
* City and local development (including housing)
* Environment and regulation
* Economic and cultural development
* Council support

**2. Key areas of the LPTP**

**a) Water**

Disabled people were significantly impacted by last year’s flooding events in Auckland with many gaining firsthand experience of the poor state of the city’s water network which had been subjected due to decades of under-investment, leading to its large-scale failure as the region faced some of its most damaging storms in over a century.

DPA supports the proposals under the get more, pay more plan to accelerate the ‘Making Space for Water’ programme within six years rather than delivering it within 10 years under the central proposal.

This programme will create critical blue-green networks, overland flow path management, better protection and support of rural residents, establish better flood intelligence/warning systems, provide for stream rehabilitation, community-led flood resilience and increased maintenance of stormwater networks that will enable them to cope with future extreme weather events.

If the proposed ‘Making Space for Water’ investments are to be workable, provide value for money and keep everyone safe, then it is important that Council engages with all communities, including our disabled community, about how to make aspects of these programmes fully inclusive and accessible.

Aspects of the programme which will need an accessibility audit during the design phase include the location and design of blue-green networks; identifying where overland flow path management is needed; ensuring that flood intelligence/warning systems are accessible to everyone including Deaf and disabled communities; and the development and provision of community-led flood resilience programmes.

We also support proposals to increase investment in renewal assets to improve the resiliency of the region’s water network, bring forward investment to further reduce outflows and improve compliance with discharge consents and reduce gaps in the wastewater infrastructure such as those in Clarks Beach, Waiwera, Red Hills and Warkworth.

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| **Recommendation 3:** that Auckland Council conducts an accessibility audit on relevant aspects of the ‘Making Space for Water’ programme and that it engages with the disabled community when doing so. |

**b) Transport**

The provision of public transport services is important for disabled Aucklanders in terms of the ability to undertake social connection, inclusion and participation in their communities. It is also important to ensure that public transport is fully accessible as electric wheelchair users have had difficulties accessing the ferries on the accessible ramps.

Last year DPA made a submission on the Council’s 2023/24 Budget which criticised the proposals to reduce public transport services.

We strongly urge that there is sufficient funding in the budget for Auckland Transport (AT) to be able to fully realise their Accessibility Action Plan[[6]](#footnote-7) which aims to make the city’s transport network fully accessible for everyone, including disabled people.

DPA supports the extension of the electric train network and future integration works for the rapid transit network mega projects. We see rail as potentially one of the most accessible ways for disabled people to access public transport and play our part in reducing carbon emissions.

Another set of proposals we endorse are those around maintaining and increasing the levels of public transport services provided. Undertaking more investment in this space will ensure that more Aucklanders – including disabled people - can enjoy the benefits of more modern, environmentally friendly, accessible buses as we move towards 2030.

DPA would really like to see other much needed safety improvements realised including plans to remove more rail crossings (where serious accidents involving disabled people have occurred both locally and nationally) alongside the construction of more walking and cycling connections.

From our perspective, the development of active transport modes is important for everyone, including 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. Aside from that consideration, we fully endorse the expansion of active transport networks across the city under using the pay more, get more option.

Also 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.

DPA recommends that Council continue funding road safety programmes in the LTP including the construction of more raised pedestrian crossings.

DPA supports capping public transport charges for individual users at $50 per week but notes that not many disabled people will make that many journeys on a weekly basis.

Another issue in the affordability space is the threshold used by AT around funding free transport for people to attend community group organised public events in the city. We have heard that the organiser of the ‘Power in the Park’ event approached AT over whether it would fund free public transport for disabled people to attend this disability community-oriented event. AT advised the organiser that the threshold for doing so was that the event had to be for over 10,000 people, a number that the organiser was not expecting.

As it happens, the ‘Power in the Park’ event successfully went ahead and attracted 1500 people. However, if AT had more room in its budget to support an event that was aimed at a transport disadvantaged group in the form of Auckland’s disabled community, then more disabled people and their whānau/families would have attended.

DPA recommends that Auckland Council adequately fund AT so that it can reduce the minimum threshold for offering free transport to community events, particularly those aimed at transport disadvantaged groups which include disabled and older people.

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| **Recommendation 4:** that Council increase its investment in public transport to enable implementation of AT’s Accessibility Action Plan. |
| **Recommendation 5:** that Council reduce the minimum threshold for offering free transport to community events aimed at disabled people and other transport disadvantaged groups. |
| **Recommendation 6:** that Council continue funding road safety programmes in the LTP including the construction of more raised pedestrian crossings. |

**ii. Total Mobility (TM) and access to funded services**

Currently one of the biggest issues for disabled people in the transport space centres around the availability of Total Mobility funded services and this factor needs to be included as a specific item in the LTP.

Disabled people throughout the Auckland region and elsewhere in Aotearoa continue to face significant challenges in being able to exercise transport choice, especially when it comes to accessing mobility taxis/small passenger vehicle services aimed at people using wheelchairs and mobility devices.

In 2023, media reports highlighted how the shortage of mobility taxi van services had reached crisis point nationally, and this included a Radio New Zealand website article featuring Auckland-based wheelchair user Barney Koneferenisi who expressed his frustrations on this subject. In the same story, small passenger service/taxi company providers pointed to prohibitively high set up costs[[7]](#footnote-8) as being one of the main reasons for this.

This factor exacerbated a driver shortage as many passenger service operators could not be persuaded into providing these services. And all this at the same time as the Waka Kotahi fund (jointly administered with regional councils) to subsidise small passenger service vehicle mobility conversions had not had much uptake as small passenger service providers claimed that the amount available did not fully cover the costs involved in vehicle conversion. Disabled also commented that the inability for mobility taxi services to use bus lanes on motorways made it costly for them to travel regularly.

During this renewed crisis for the mobility transport system, Waka Kotahi announced a highly anticipated review of the Total Mobility (TM) Scheme[[8]](#footnote-9) to consider these and other issues that have surfaced around the scheme over the last decade.

However, the review could take around a year to deliver recommendations and then possibly a further year after that to begin implementing any changes. During that time, disabled people in Auckland will still need access to affordable, accessible public transport options.

That is why DPA recommends that Council set aside additional funding for the first two financial years of the plan (2024/25 and 2025/26) to enable more mobility vehicle fit outs to be undertaken in the Auckland region so that potential passenger service operators (who often have minimal capital) do not have to carry so much cost.

The best way to do this would be through Council increasing its maximum contributions for vehicle conversions to a level that would (alongside the Waka Kotahi contribution) enable potential providers to fully cover the costs of conversions, allowing them to put more vehicles (preferably electrical or low carbon) on the road sooner.

After that period, central government (via Waka Kotahi/NZ Transport Agency) and regional councils might then be able to agree on a more viable funding model for mobility vehicle conversions and TM services.

Otherwise, DPA recommends that Auckland Council (and all Councils) await the outcomes of the national TM review before implementing any further changes.

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| **Recommendation 7:** that Auckland Council maximise its contribution (over and above the Waka Kotahi contribution) to the cost of fitting out all new mobility service passenger vehicles through increased funding for this purpose. |
| **Recommendation 8:** that Auckland Council await the outcome of the Total Mobility review before proceeding with any further changes. |

**c) Parks and community**

DPA would like to remind Auckland Council of its obligations to ensure that the design of any new housing, public buildings, businesses and public environments meets Universal Design principles.

DPA supports the proposals to enable Council to put more investment into community asset renewals, maintenance and running costs.

Council investment in new assets including new parks and buildings would be positive from an accessibility standpoint as building new facilities would mean that they could be designed and constructed to Universal Design principles.

This would allow Council to retire some older, less accessible facilities from use in favour of much newer, fully accessible and inclusive ones.

DPA fully endorses the more equitable fairer funding model for local boards as this will mark a move away from using an asset-based approach to one that will equally benefit all communities, irrespective of their socioeconomic status.

For Auckland’s poorest communities, where many disabled people reside, this will enable boards in these areas to make greater investments in more accessible facilities and services.

**d) City and local development (including housing)**

DPA supports the Eke Panuku’s $100 million Strategic Development Fund enabling better regeneration outcomes with the reminder that community consultation is accessible, Universal Design principles are key, and the Auckland Council Disability Panel is given ample time to consult on any urban regeneration projects.

Te Ara Tukutuku development on Wynyard Point for a park, access to Wynyard Wharf, new laneways and streets and enabling works for future mixed-use development sites must be designed in a manner that pedestrian safety barriers do not block walkways for wheelchairs, mobility scooters and mobility trikes.

DPA encourages the safety aspect of the current regeneration programmes for our disabled community. The disabled community have also requested that Manukau and Waitakere which is part of the urban regeneration programmes have low level rates for people 55 years and older which includes our disabled community.

We request that the Midtown Regeneration Programme and the Karanga-a-Hape Station neighbourhood improvement programme to enhance the urban environment and support growth around CRL station ensure that pathways have clear pedestrian access as Council seating, bin locations and art installations can cause blockages for disabled. There are also the additional blockages from businesses signage on these same public footpaths.

We support the access of public to port land including options for future use of Queens Wharf. Past public events on the ports have been either inaccessible or had limited accessibility for the disabled community, so an increase in awareness of the space needed for electric wheelchairs and mobility scooters for the design teams and planners is a priority.

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| **Recommendation 9:** thatAuckland Council ensures that the architects, landscape designers, engineering consultants, project management companies, placemaking agencies and infrastructure companies they work with are reminded of Council’s commitment to Universal Design. |

**e) Environment and regulation**

DPA recognises the need for central government to invest into the regional funding for the delivery of their programmes committed in the understanding that the maintenance of our environment and stewardship of green spaces is beneficial for the wellbeing of disabled.

The impact on the disabled community during last year's extreme weather events highlights the importance of climate resilience being an integral part of the Council plan. Creating climate resilience for disabled community is high priority as in times of a weather crisis, the disabled community are often an afterthought. The impact for disabled people is exacerbated by the fact that emergency services are not accessible for many with the community often bridging the gaps.

Partnership of Māori disabled in the space of mana whenua and kaitiakitanga is also key in landscape initiatives, public transport roads and footpaths, pest management, water wastewater treatment, community engagement, climate action, waste management, economic development, regional facilities and urban regeneration.

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| **Recommendation 10:** that there be further community engagement around the impact on disabled people of extreme weather events. |
| **Recommendation 11:** that the partnership of Māori disabled in the space of mana whenua and kaitiakitanga be included in the consultations |

**f) Economic and cultural development**

Auckland Council recently supported an event an inclusive event promoting the artistic creativity of the disabled LGBTQIA+ community Deepen recently which enhances the visibility of the creative disabled community. Enhancing the creative aspects within the disability community is important and creates further avenues for Council to promote visitor attractions.

Lantern, Pasifika and Diwali festivals are major events within Auckland and often accessibility are an afterthought with large festivals and events. We ask that the disabled communities be given the opportunity to highlight their creative abilities at these festivals. An example of this is the group of Deaf Japanese drummers that have toured in New Zealand.

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| **Recommendation 12:** that disabled people from diverse cultures and ethnic groups be included as part of the planning stages for festivals and major events. |

**g) Council support**

DPA supports the work of elected members and see the value of their education in disability awareness to enhance their knowledge of diversity, building equity and social cohesion.

Fit-for-purpose technology needs to include accessible technology to improve Council processes for a quicker and easier experience for all disabled Aucklanders when we need to engage with Council.

Reduction of duplication across the council organisations can mean less accessible services, so it is important that if services are moved to a centralised location that there are accessible options for people who cannot travel outside of their local areas.

Reduction of council services can also lead to reduction of staff and due to unconscious bias of non-disabled Managers,[[9]](#footnote-10) disabled staff are often the first to lose their jobs. We ask that Council ensure an ongoing commitment to a diverse and inclusive workforce[[10]](#footnote-11)

Another area of concern for us is around accessibility of local businesses, with mobility parking spaces often occupied by non-disabled customers[[11]](#footnote-12). DPA would like to see Council work with Business Improvement Districts and Business Associations to improve accessibility for disabled people to the local business environment to boost the regional economy, and support measures to ensure that mobility parking in private businesses are monitored more effectively.

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| **Recommendation 13:** that before new technology is implemented by Council that council staff ensure that it is accessible for all our disabled community. |
| **Recommendation 14:** that Council’s commitment to Universal Design be communicated to local businesses and mobility parking spaces be monitored effectively. |

1. Figure.NZ. (n.d.) *Median weekly income for disabled people in New Zealand* *2017 Q2–2023 Q2* <https://figure.nz/chart/pXcWorfm74PV07bu> [↑](#footnote-ref-2)
2. Statistics NZ Disability survey: 2013. <https://www.stats.govt.nz/information-releases/disability-survey-2013> [↑](#footnote-ref-3)
3. 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-4)
4. Auckland Council. (2018). *2018 Census Results.* <https://knowledgeauckland.org.nz/media/1180/auckland-2018-census-info-sheet.pdf> [↑](#footnote-ref-5)
5. Statistics NZ Subnational population projections, by age and sex, 2018(base)-2048 (2028 boundaries). [https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979#](https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979) [↑](#footnote-ref-6)
6. 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-7)
7. Forman, L. (Dec 2023, 19). *Money set aside for wheelchair taxis not being spent*. RNZ website. <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent> [↑](#footnote-ref-8)
8. Te Manatū Waka Ministry of Transport Total Mobility Scheme Review (n.d.) <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/review-of-the-total-mobility-scheme/> [↑](#footnote-ref-9)
9. Wyatt, A. (23 Nov 2023). *Unconscious Bias and Its Effects on the Workplace*. Employsure website. <https://employsure.co.nz/blog/unconscious-bias-and-its-effects-on-the-workplace> [↑](#footnote-ref-10)
10. Auckland Council. (n.d.). Executive Team Members Chief Executive Phil Wilson <https://www.aucklandcouncil.govt.nz/about-auckland-council/how-auckland-council-works/executive-team/Pages/executive-team-members.aspx> [↑](#footnote-ref-11)
11. CCS Disability Action. (n.d.) *Opinion: Great ways to abuse mobility parking, and why you shouldn’t* <https://www.ccsdisabilityaction.org.nz/news/mobility-parking-abuse> [↑](#footnote-ref-12)