

February 2024

To Dunedin City Council and Otago Regional Council

Please find DPA’s submission on Draft Dunedin Future Development Strategy 2024–2054

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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/$file/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.

# The submission

## Introduction

DPA welcomes the opportunity to engage on the Dunedin City Council and Otago Regional Council’s Future Development Strategy for Dunedin and notes the importance of this plan in determining where housing and business premises can base themselves over the next thirty years.

DPA supports the strategic directions, priorities and environmentally sustainable transport options outlined in this plan. We have some recommendations around how to strengthen the plan to ensure that Ōtepoti Dunedin becomes a more inclusive, accessible city by 2054.

In line with the disabled community’s desire to see a fully inclusive, accessible city, new housing and public buildings should be designed and constructed according to universal design principles, enabling all users to have inclusive access to all homes and buildings across their natural lifetime.

Supporting infrastructure including new roads, footpaths, parks and recreational areas and community facilities should be built to the highest universal design accessibility standards as well.

We recognise the need for planning and development to be undertaken in an environmentally sustainable and balanced way and in a manner which takes full account of the need to accommodate the impacts of climate change and other risks.

Building new, accessible homes and businesses in areas at high risk of being subjected to climate change impacts such as flooding, sea level rise and geological impacts creates unnecessary risks for disabled people. Newly zoned areas should be deemed as either at low or no risk of being impacted by either climate change or geological risks before being approved for development.

Building an inclusive, accessible climate change proof Ōtepoti Dunedin where everyone, including disabled people, can fully participate in their communities without barriers should be the overriding objective of both the DCC and ORC in this plan.

## Disability data

For disabled people, accessibility must be an essential and central component of planning for Dunedin’s growth over the next 30 years.

According to the 2013 Statistics New Zealand Disability Survey, one in four New Zealanders have a disability or long-term health condition. Māori and Pacific peoples have an even higher-than-average rate of disability.[[1]](#footnote-2)

The number of disabled people in Dunedin’s population is projected to increase over the next three decades due to the high incidence of ageing within the population, amongst other factors.

Given the 2013 Disability Survey’s figures and factoring in the draft plan’s projections of a 146,500 population for Dunedin City by 2054, this could mean that there could be an estimated 36,600 (or even more with an ageing population) disabled people living within the city’s boundaries by that time.

## Housing

Disabled people are one group who are disproportionately impacted by homelessness and poor housing. This is due to disabled people being overrepresented amongst low-income earners while also facing higher living costs due to disability. Consequently, disabled people are more likely to be renters; 2018 data from Statistics New Zealand shows that 47% of disabled people rent compared to 35% of non-disabled people.[[2]](#footnote-3)

Disabled people are also at greater risk of homelessness due to the lack of security around ongoing tenancy and this is exacerbated by the low number of accessible houses not only in Dunedin but throughout the country.

We have an expectation that at some point over the next 30 years, central government will move to legislate for housing design standards to focus on universal design, which will enable disabled and non-disabled people alike will be able to live in homes that are both accessible and usable across their natural lifespans.

DPA fully supports the work being undertaken by the DCC in the housing space through the development of its Housing Action Plan and Implementation Plan   
2023–24 which specifically mentions the importance of housing accessibility for disabled people.

We are pleased that this draft future development strategy specifically recognises the importance of building accessible housing to accommodate the needs of our growing disabled and older populations as part of Strategic Direction 4.5 around Dunedin having a range of quality housing choices (pg.36).

DPA recommends that this can best be achieved through universal design accessibility being specifically referenced in all planning documents including future versions and updates to the 2GP District Plan.

DPA asks that DCC look at ways of incentivising private, government and non-government organisations to build more housing and business premises to Lifemark UD standards.

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| **Recommendation 1:** that all future city planning documents, including district plans, reference the need for housing to be designed and constructed to universal design (UD) standards in Ōtepoti/Dunedin. |
| **Recommendation 2:** that the DCCincentivise the building of more compact, accessible to Lifemark UD standard houses and public buildings. |

## Climate change and planning impacts on disabled people

DPA supports the insertion of Strategic Direction 4.12 stating that ‘Ōtepoti Dunedin is resilient to the risk from hazards and is prepared for and able to adapt quickly to the effects of climate change’.

We welcome the inclusion of this objective as the disabled community are already being severely hit by the impacts of climate change and are expected to be one of the hardest hit population groups going forward, locally, nationally, and internationally.[[3]](#footnote-4)

The combined impacts of climate change and sea level rise could mean that mitigation measures and/or managed retreat is a real possibility for coastal areas of Dunedin, especially in South Dunedin and in areas where there is an increased flooding risk, including on the Taieri Plains.

The fact that certain locations may be deemed unsuitable for house building and settlement activity or even face managed retreat means that disabled people (especially those living in the abovementioned areas) need to be fully involved in discussions about this issue.

Land which is either at climatic and/or geological risk should not be zoned for building upon. This is important as there have been councils around the country that have approved the building of housing in flood prone areas, an issue highlighted by last year’s Auckland and North Island flooding events.[[4]](#footnote-5)

DPA have outlined our concerns around the dire shortage of accessible housing across the country and the need for this to be addressed within the Dunedin context. However, the need for accessible housing should not result in these being built-in high-risk areas where new builds can suddenly be rendered uninhabitable if they are damaged or destroyed in natural events like flooding or landslides.

We state this as disabled people are likely to be heavily impacted if either newly built or existing accessible homes are impacted in this way. For many people within our disabled community, this means having to spend time living in sub-optimal, less accessible accommodation and spending what limited income they may have on buying new furniture and household appliances (especially if people are un-insured as many disabled people are). Disabled people should not have to choose between living in inaccessible unsuitable homes or in a home at high risk from flooding or other event.

DPA is pleased to see that under 6.2.1 around natural hazards constraints (p.49) the explicit statement in the draft plan that some undeveloped and non-intensified areas of Dunedin are deemed unsuitable for either new or further development due to moderate or high climatic and geological risks.

DPA recommends that both councils regularly review the geographical risk profile of the Dunedin City area so that more areas can be declared at-risk from climate change (if necessary) thereby enabling the banning of any further development activity within them.

In respect of local discussions regarding the future of the city around climate change, we have been fully supportive of the work undertaken by the South Dunedin Future Project. We have been at the forefront of efforts in getting the project team to engage with the disabled community of South Dunedin, given that there is a high proportion of disabled people within the suburb’s population.

The engagements we and the wider disabled community have had with the team so far have been constructive and we expect this to continue.

As we noted earlier, climate change is and will continue to have a disproportionate impact on disabled people. For this reason, we emphasise the importance of both councils seeking to continue involving disabled people and disability organisations in all planning and discussion around climate change with the Bristol Disability Forum model something that we have constantly highlighted as best practice in this respect.[[5]](#footnote-6)

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| **Recommendation 3:** that both the DCC and ORC regularly review the land risk profile of the Dunedin City area so that more areas can be declared at-risk from climate change if necessary. |
| **Recommendation 4:** that both the DCC and ORC continue to involve disabled people in all aspects of all planning and discussion around climate change. |

## Transport, infrastructure and connected communities

DPA supports the inclusion of Strategic Directions 4.8 around Ōtepoti Dunedin needing to be a compact and accessible city and 4.10 on the need for Otepoti Dunedin neighbourhoods to be attractive and supportive of healthy, connected communities.

Both strategic directions are important for our Ōtepoti Dunedin disabled community as making our city compact, connected and supportive of everyone makes a huge difference to our wellbeing.

Like any other group, disabled people want to feel a part of the communities we live in but can sometimes feel marginalised and excluded through poor accessibility and urban design.

That is why access to well designed, accessible, inclusive communities means making provision for inclusive transport, infrastructure and urban design for everyone, including disabled people.

Some of Dunedin’s growing communities, including Mosgiel, Waldronville/Brighton, Otago Peninsula and other locations could become real leaders in developing accessible communities where we as disabled people feel fully included through the ability to participate freely without barriers.

This can be achieved through having, for example, mobility crossings with kerb cut outs, quiet spaces where people can retreat to in busy areas (which are suitable for neurodivergent people and people experiencing mental distress), accessible bus stops, mobility parking and vehicle drop off areas, appropriate seating where people can sit and rest as well as good lighting and security features.

Building all supporting infrastructure to UD standards should support the building of accessible, inclusive communities but more detail needs to be included in the final plan as to how.

The best way to do this is through ensuring that Universal Design Standards are written into the final plan so that they are understood by developers, planners, architects, and builders.

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| **Recommendation 5:** that the final Development Plan fully incorporate Universal Design Standards to ensure accessibility across all supporting community infrastructure including buildings, retail outlets, foot paths, schools, and community facilities. |

All modes of transport including driving, bussing, walking, cycling, taxis and trains need to be more accessible. The main challenge to improving transport for disabled people lies in turning plans for improved accessibility into action not only in Dunedin but around the country.

This can be seen in the Waka Kotahi research report (on which DPA collaborated) entitled ‘Transport experiences of disabled people in Aotearoa New Zealand’.[[6]](#footnote-7)

This research illustrated the ongoing accessibility challenges faced by disabled people when using all modes of transport. Disabled people’s main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the disablist attitudes of some transport planners.[[7]](#footnote-8)

Disabled people also have ongoing issues with accessing buses and mobility taxis in Dunedin (as well as throughout the country) which raises the need for improved transport accessibility and affordability, including for disabled people, as being key to the success of all urban planning efforts going forward.

While there has been progress made in improving transport accessibility in Dunedin (especially around buses) with more plans to do so, DPA would like to see futher progress made and DCC to encourage Kiwi Rail to trial an accessible daily commuter suburban rail passenger service between Dunedin and Mosgiel.

Also, to complement existing bus and mobility passenger services, door-to-door public transport options, like accessible dial-a-ride rideshare services should be trialled in Dunedin. These types of options are already successfully operating in Hamilton and Timaru.[[8]](#footnote-9)

Such services would increase the number of options available and ensure that people had access to efficient, timely transport options that would be available without having to pre-book so far in advance as is the case now with all mobility transport services in the city.

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| **Recommendation 6:** that the DCC and ORC plan to put more accessible, affordable public transport options/choices into service including trialling commuter rail links between Dunedin and Mosgiel and dial-a-ride services to complement existing services. |

DPA welcomes proposals to enable safe, attractive, and connected opportunities for walking, cycling and other micromobility. This should be undertaken on the proviso that there are separate but parallel spaces for pedestrians and cyclists/micromobility users.

## Blue – Green networks

DPA supports the proposed creation of blue-green networks as a way of creating green open spaces where water can flow through as a means of flood control.

We note that the establishment of these types of spaces has been mooted in other council planning consultations around the country, and they could provide one of the ways in which flooding could be managed in places like South Dunedin.

These spaces should be made fully accessible for everyone, including disabled people and that our disabled community should be involved in the co-design of these spaces to ensure that they are.

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| **Recommendation 7:** that blue-green spaces be made fully accessible for everyone, and that disabled people are involved in their design. |

1. Statistics New Zealand. (2013). New Zealand Disability Survey. Retrieved from <https://www.stats.govt.nz/assets/Uploads/Disability-survey/Disability-survey-2013/Disability-survey-2013-additional-documents/The-New-Zealand-Disability-Survey-2013-easy-read-version.pdf> [↑](#footnote-ref-2)
2. Statistics New Zealand. (2018). The disability gap 2018. Retrieved from <https://www.stats.govt.nz/infographics/the-disability-gap-2018/> [↑](#footnote-ref-3)
3. 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> [↑](#footnote-ref-4)
4. Newton, K. (2024, January 26). 1415 new homes consented on Auckland flood plains in the year since flooding disaster. Radio NZ website. <https://www.rnz.co.nz/news/in-depth/507562/1415-new-homes-consented-on-auckland-flood-plains-in-the-year-since-flooding-disaster> [↑](#footnote-ref-5)
5. Kelly-Costello, A. (2022, May 3). “We can turn this around: Bristol’s plan for a Green and Accessible Future.” Disability Debrief. <https://www.disabilitydebrief.org/debrief/we-can-turn-this-around-bristols/> [↑](#footnote-ref-6)
6. Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). Transport experiences of disabled people in Aotearoa New Zealand (Waka Kotahi NZ Transport Agency research report 690). Retrieved from <https://www.nzta.govt.nz/resources/research/reports/690> [↑](#footnote-ref-7)
7. Kelly-Costello, A. (2023, June 30). Putting a blind-friendly transport system on the agenda. Blind Citizens New Zealand. <https://abcnz.org.nz/uncategorized/putting-a-blind-friendly-transport-system-on-the-political-agenda/> [↑](#footnote-ref-8)
8. <https://timaru.metroinfo.co.nz/myway-by-metro/> and <https://www.busit.co.nz/flex/> [↑](#footnote-ref-9)