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**To Dunedin City Council**

Please find attached Review of 2GP heritage provisions and design of multi-unit housing

For any further inquiries, please contact:

Chris Ford

Policy Advisor – Southern and Central

[policy@dpa.org.nz](mailto:policy@dpa.org.nz)

# 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/$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:**

**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

DPA welcomes this opportunity to give feedback to the Dunedin City Council on the Review of 2GP Heritage provisions and design of multi-unit housing.

From a disability perspective, there is much that needs to be done in terms of making heritage buildings more accessible and increasing the stock of universal design accessible housing.

In terms of our submission, we will firstly discuss the 2GP heritage proposals and secondly, the issues around multi-unit housing.

DPA notes that the multi-unit housing consultation is in the form of a survey. However, we provide written feedback in this submission based on the questions asked in the survey from an accessibility perspective.

## 2GP Heritage Proposals

DPA welcomes the Council’s development of its Built Heritage Action Plan in 2023.

DPA supports the need to retain the Ōtepoti Dunedin’s unique heritage buildings, which are some of the most pristine and beautiful in Aotearoa.

These include the University Clocktower Building, Municipal Chambers, Dunedin Railway Station, Toitū Settlers Museum, First Church, Knox Church and many others besides throughout the city.

It is important that historic buildings and places which are important to Kāi Tahu are preserved and protected as part of Ōtepoti’s obligations under Te Tiriti o Waitangi.

In terms of accessing heritage buildings, we note the legislative requirements which are triggered if a heritage building needs modifying and this includes the addition of accessibility requirements.

However, disabled people are frustrated by the limits that are put on the extent to which a building can be modified under current historic places legislation.

An example of this is that in some multi-storey heritage buildings, disabled people, especially mobility device and wheelchair users, are sometimes unable to access the upper floors of a building if heritage auditors deem that the addition of a lift would alter and/or interfere with the character of an historic building.

One of our DPA staff once lived in an historic home with his family in North Otago which has now been converted by its current owners into a luxury bed and breakfast facility where the only facilities able to be accessed by people who are wheelchair and/or mobility device users are downstairs.

This is the case as Heritage New Zealand Pouhere Taonga prevented the building’s owners from installing either a stair climbing chair or installing a lift due to the covenants applying to that specific property.

These types of restrictions may act to preserve a building’s character, but this can come at the expense of making it fully accessible and inclusive for disabled people.

We admit that the DCC building inspection team is limited by the existing heritage legislation, but we would prefer to see as fewer instances of this as possible.

DPA recommends that a representative of the disabled community with accessibility knowledge be appointed to any heritage building advisory groups which the Council may establish.

## Need to further reduce demolition by neglect

## Multi-unit housing