

April 2024

To Otago Regional Council

Please find attached DPA’s submission on Long Term Plan 2024–2034

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# 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

## Introduction – Need to work together for the environment

Disabled Persons Assembly (DPA) is pleased to provide feedback on the Otago Regional Council’s (ORC’s) Long-Term Plan (LTP) for 2024–2034.

Disabled people are an important population group as we constitute a significant share of Otago’s population as in the 2013 New Zealand Disability Survey (the latest statistics available), an estimated 26% of Otago residents were living with impairments, 1% above the estimated percentage of disabled people living in New Zealand. If these statistics are overlain with the most recent population estimates for Otago (n=254,600) then at least 66,196 disabled people are living in the region as of 2023.[[1]](#footnote-2)

Another significant factor to note is that the number of disabled people is set to increase dramatically as our population ages.

These increases in the disabled population of the region and country come at a time when both Aotearoa and the world face an increasing number of environmental and social challenges.

As we have pointed out in past submissions to this Council and others around Aotearoa, disabled people will be – and already are – one of the most at risk groups from climate change impacts.

For this reason, climate change, the need to mitigate it and ensure that there are effective responses which incorporate disabled people at all levels is one of DPA’s top priorities.

A recent article published by the journal ‘Nature Climate Change’[[2]](#footnote-3) highlighted that governments werefailing to take disability inclusive climate action and disabled people are disproportionately more at risk of higher mortality rates in climate emergencies.

This is underpinned by the fact that disabled people have been accorded lower priority in climate emergencies or other disasters and systemically excluded from receiving emergency healthcare and humanitarian support as a result.

The article also highlighted that slow onset climate change, including sea level rise, more damaging weather events, as well as rising water and food scarcity will all exacerbate the existing inequities experienced by disabled people.

Michael Stein, in a Harvard University Center for the Environment (2023)[[3]](#footnote-4) interview elaborated about the impact of climate change on disabled people:

“Climate change amplifies the marginalization experienced by persons with disabilities negatively affecting health, reducing access to healthcare services, food, water, and accessible infrastructure. People with psychosocial disabilities have triple the rate of mortality in heatwaves.”

For all the above reasons, we need disability-inclusive climate adaptation where ORC collaborates with disabled people to develop disability-friendly adaptation and mitigation policies informed by research.

We would like to take the opportunity afforded by this LTP to note the progress that Council has made in the following areas of importance to disabled people:

* placing more accessible electric buses on the streets of Dunedin and Queenstown
* introducing low, flat $2 fares for bus users in Dunedin and Queenstown
* progressing work around climate change mitigation including through co-sponsoring the South Dunedin Future project, which has been engaging with the suburb’s disabled community
* addressing environmental degradation throughout the province in terms of planning for cleaner water, air and soil which benefits everyone, including disabled people.

We provide feedback and recommendations in this submission on the following key proposals in this LTP:

* Priority 1: Investing in our environment
* Priority 2: Investing in public transport
* Priority 3: Changing the rating system.

We also highlight the need to invest more in emergency management given the barriers disabled people face in civil emergencies as well as in infrastructure strategy when it comes to flood, drainage and river control programmes.

## Proposal 1: Environment

DPA recognises the importance of ORC’s environmental regulation and protection work. There is more need than ever for regional councils (including ORC) to step up and work with partners including iwi and local communities to safeguard the environment to the maximum extent possible.

Living in a properly regulated and protected environment benefits everyone, including disabled people who are at greater risk of, for example, being adversely affected by the impacts of air pollution and by climate change.

DPA favours Option 3 as it would enable more work to be done around addressing the considerable environmental issues facing the region.

We expect that this funding would cover work on the South Dunedin Future project, run in collaboration with the Dunedin City Council.

South Dunedin has a high proportion of disabled people in its population and given what was stated above disabled people already bearing the impacts of climate change, our community has been increasingly involved in discussions with the project, which we have found beneficial.

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| **Recommendation 1:** that ORC opt for Option 3 to ensure funding for needed environmental regulation and protection. |

## Proposal 2: Investing in public transport

DPA is pleased to see the proposal to spend $315 million on the regional public transport system over the ten-year timeline of this plan.

DPA has outlined in past ORC consultations, including the most recent one on the mid-term review of its Regional Land Transport Plan (RLTP) the need for inclusive, accessible transport.

We would also like to point out to Council that in 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled “Transport experiences of disabled people in Aotearoa New Zealand.”3

This research illustrated the ongoing accessibility challenges faced by disabled people when using public 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 ableist attitudes of some transport planners.

There were two key recommendations made in that report.

The first concerned the need to take a ‘whole-of-journey approach’ when making decisions around future transport investments to improve access to transport for disabled people. As the report outlined, if both central and local government adopted these approaches, there could be a shift away from relying on making small interventions that address only specific aspects of some trips to taking a more comprehensive approach to journey planning.

The second is that by central and local government transport planners taking a more comprehensive approach, it would enable a transition to an ‘accessible journeys for all’ approach whereby our transport system would be required to provide accessible journeys for everyone, including disabled people.

DPA recommends that ORC take the opportunity presented by both the RLTP and this LTP to begin implementing the ‘whole of journey’ and ‘accessible journeys for all’ transport approaches within the Otago region.

The beginnings of a ‘whole of journey’ and ‘accessible journeys for all approach’ can be seen in the proposals to continue rolling out electrically powered buses in Dunedin and Queenstown. DPA recommends this is undertaken on the proviso that all buses on all routes are accessible for everyone, including disabled people. DPA positively notes that these new buses contain sufficient seating for wheelchair users, audio announcements for the benefit of blind and low vision people, and space for service animals.

DPA recommends that additional funding is allocated to making public transport information available in accessible formats including Easy Read, New Zealand Sign Language, Braille, large print, audio, and captioned video about bus services.

DPA is also pleased to see that an investigation and trial of public transport (mainly bus links) is proposed for Ōamaru; Alexandra, Clyde, Cromwell to Queenstown; Balclutha to Dunedin (including airport); and Wānaka.

DPA fully supports trialling public inter-regional transport services in these communities which have been significantly under-served. Our major ask is that the trial services are fully accessible to everyone, including disabled people. This includes putting fully accessible electrically powered coaches and/or mobility vans on the road for these trials.

Another issue in the public transport space which was not specifically mentioned in the consultation document is Total Mobility.

In our recent submission on the Draft Mid-Term Review Otago Southland Regional Land Transport Plans 2021–2031, we discussed the unfolding crisis within the TM transport space, especially around the lack of mobility vehicles to provide 24/7 services in main centres like Dunedin and Queenstown.

One of the principal reasons is the inability of providers who wish to enter the industry not being adequately financially supported to do so in the form of incentives like funding for mobility vehicle conversions. Due to many potential providers lacking the necessary capital to do so, there are an insufficient number of mobility vehicles on the region’s roads.

Again, we wish to reiterate our recommendation from the RLTP review that the ORC 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, thereby meaning that providers do not have to carry much, if any of the costs of doing so.

DPA favours Option 1 in terms of improving public transport within the region as the best way to achieve the outcomes we seek.

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| **Recommendation 2:** that ORC opt for Option 1 to ensure needed investment for public transport. |
| **Recommendation 3:** that ORC take the opportunity presented by both the RLTP and this LTP to begin implementing the ‘whole of journey’ and ‘accessible journeys for all’ transport models within the Otago region. |
| **Recommendation 4:** that trial inter-regional services are fully accessible to everyone, including disabled people. This includes putting fully accessible electrically powered coaches and/or mobility vans on the road for these trials. |

## Proposal 3: Changing the rating system

DPA’s only comment on this issue is that the ORC advises ratepayers about the availability of rates rebates from central government for low-income ratepayers who may have difficulty paying full rates.

Statistics show that disabled New Zealanders are grossly overrepresented amongst low-income earners with many earning less than $30,000 per annum.[[4]](#footnote-5)

It is also important that rates rebate information is also made available in accessible formats for disabled people by the ORC.

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| **Recommendation 5:** that Council advises ratepayers about the availability of rates rebates for low-income ratepayers and that information about them is provided in accessible formats. |

## Emergency management and flooding hazards

Flood protection work is important for keeping everyone safe, including disabled people.

DPA acknowledges the work that has been done to keep numerous communities throughout the Otago region safe including in Mosgiel/Taieri, Lower Clutha, Tokomairiro, and North Dunedin.

In the wake of the South Dunedin Future project, DPA recommends that the ORC makes a considerable contribution (alongside any contribution from the DCC and central government) to fund any outcomes stemming from community feedback into the South Dunedin Future long term plan due in 2026.

An example of why disabled people benefit from protection works such as the creation of flood banks and better drainage systems is the desire to avoid homelessness.

Disabled people, especially those who live with mobility and other impairments, face a great shortage of accessible housing which is difficult to access even at the best of times, let alone after a natural disaster.

Following last year’s North Island storms, there were stories about disabled people who could not return to their homes for many months afterwards, and some disabled people (as we heard earlier this year) are still living in inaccessible housing over a year later.

DPA recommends that there is increased investment in flood and drainage scheme maintenance, as well as operational and capital projects to increase flood and river resilience throughout the region.

Providing an effective emergency management system is important for the region as well. Recent government reports have indicated that the North Island storm events of 2023 exposed this country’s emergency management systems as having significant shortcomings.[[5]](#footnote-6)

These findings are very alarming to disabled people throughout Aotearoa, including in Otago, given the comments we made earlier in the submission about the needs of disabled people being overlooked in emergency situations.

DPA recommends that Council allocate additional spending to civil defence and emergency management over the lifespan of the LTP in expectation of the increased number of climate change related and other emergencies.

DPA also recommends that disabled people are appointed to Otago regional civil defence and emergency management committees to ensure that our community’s voice is heard in both the emergency planning and response spaces.

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| **Recommendation 6:** that the ORC makes a considerable contribution to fund any outcomes stemming from community feedback into the South Dunedin Future long term plan due in 2026. |
| **Recommendation 7:** that there is increased investment in flood and drainage scheme maintenance, as well as operational and capital projects to increase flood and river resilience throughout the region. |
| **Recommendation 8:** that ORC allocates additional spending to civil defence and emergency management over the lifespan of the LTP in expectation of the increased number of climate change related and other emergencies. |
| **Recommendation 9:** that disabled people are appointed to Otago regional civil defence and emergency management governance committees to ensure that our community’s voice is heard in both the emergency planning and response spaces. |

1. <https://rep.infometrics.co.nz/otago-region/population/growth> [↑](#footnote-ref-2)
2. Stein, J.S., Stein, M., Groce, N. & Kett, M. (2023). The role of the scientific community in strengthening disability-inclusive climate resilience. *Nature Climate Change 13*, 108-109. [https://www.nature.com/articles/s41558-022-01564-6.epdf?](https://www.nature.com/articles/s41558-022-01564-6.epdf?sharing_token=WG7FDIwxm9EdrpxLpip75tRgN0jAjWel9jnR3ZoTv0OlD0JgJ93tTQjFULmdry3BVlmuGxD5onmsJt996nkMEGAr2tCBsveYWZXhgtd709bHCKwbcstWptPivtOz4U34R-phYAWEgIDvEDGs0fzjPHcHM0ng8l0DWIje7vQzL10%3D) [↑](#footnote-ref-3)
3. Harvard University Center for the Environment. (2023, January 19). *Disability in a Time of Climate Disaster*. Retrieved from [https://environment.harvard.edu/news/disability-time-climate-disaster#](https://environment.harvard.edu/news/disability-time-climate-disaster#:~:text=Climate%20change%20amplifies%20the%20marginalization,rate%20of%20mortality%20in%20heatwaves) [↑](#footnote-ref-4)
4. King, P. T. (2019). Māori with Lived Experience of Disability Part II. Commissioned by the Waitangi Tribunal. Retrieved from <https://forms.justice.govt.nz/search/Documents/WT/wt_DOC_150473583/Wai%202575%2C%20B023.pdf> [↑](#footnote-ref-5)
5. <https://www.rnz.co.nz/news/national/514982/significant-shortcomings-in-nz-s-emergency-management-system-inquiry> [↑](#footnote-ref-6)