May 2024

**To Rotorua Lakes District Council**

Please find attached DPA’s submission on the Rotorua Lakes District Council Long Term Plan 2024–2034

For any further inquiries, please contact:

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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/%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

# Disabled Persons Assembly (DPA) is pleased to provide feedback on the Rotorua-Lakes District Council’s (RLDC’s) Long-Term Plan (LTP) for 2024–2034. We believe that it is essential that investment in council services and infrastructure be maintained, even increased to ensure our infrastructure is resilient, fit for purpose and of a robust standard.

Disabled people are an important population group as we constitute a significant share of Rotorua’s population as in the 2013 New Zealand Disability Survey (the latest statistics available), an estimated 24% of the New Zealand population were living with impairments. The Bay of Plenty region had New Zealand’s highest percentage of disabled people with 27% self-identifying as people with impairments. In Rotorua-Lakes, the 2013 survey found that the number of disabled people living in the district that year stood at 39,976.[[1]](#footnote-2)

More up-to-date disability population data is scheduled to be released by Statistics New Zealand later this year when the results of its Disability Survey 2023 are due.

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

As the Long-Term Plan (LTP) elaborates, in Rotorua’s case this is linked to the resilience of the city’s infrastructure, service provision and its reputation.

Rotorua-Lakes, like other local councils, face the need to update and replace physical infrastructure including community facilities, footpaths, walkways, cycleways, council housing and recreational/cultural amenities.

We understand from DPA members in Rotorua that there’s more work to do to make the city fully accessible and inclusive for disabled people, and that the disability community would like to engage with Council to improve safety and accessibility around existing roads, streets, bus stops and footpaths for which it has responsibility.

Rotorua City has been severely impacted by the ongoing effects of this country’s housing crisis, which has seen homelessness rates rise considerably and led to popular tourist areas like Fenton Street becoming home to increasing numbers of homeless people living in emergency housing motels over the last few years.

A disproportionate number of the city’s homeless are most likely disabled people given a multiplicity of factors, including that only an estimated 2% of New Zealand’s total housing stock is accessible for disabled people.[[2]](#footnote-3)

However, DPA and Rotorua’s disabled community see hope on the horizon in Council agreeing to develop a Disability Policy and Action Plan. Good examples are those developed by neighbouring councils in Tauranga and Hamilton, which have seen significant gains for disabled people in those areas.

On that basis, DPA recommends that the RLDC prioritise the development of a disability policy and action plan within the first years of this LTP and invests resource to enable its successful implementation across Council.

This submission will cover the key areas contained within the submission document around:

* environment, climate and infrastructure
* future of pensioner housing and housing
* aquatic centre revitalisation
* building our reputation and our economy.

DPA will make recommendations about ways in which this document can inclusive of disability so that the voice of the district’s disabled community can be fully raised within the final LTP.

Council, by ensuring that the voices of disabled people are uplifted in this document, will go some way towards meeting its obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

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| **Recommendation 1:** that RLDC prioritise the development of a disability policy and action plan within this LTP and invests resource to enable its successful implementation across Council. |

**1. Environment, climate and infrastructure**

**a) Environment and climate**

DPA acknowledges the impact of climate change everywhere in Aotearoa, including in Rotorua.

As DPA have pointed out in submissions to other councils around Aotearoa, disabled people will be – and already are – one of the most at risk groups from climate change.

The 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.

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

In the New Zealand context, the need for disabled people to be considered as a population group at greater risk from climate change and future civil emergencies stemming from it has been recognised in research from Massey University’s Environmental Health Intelligence Unit.[[3]](#footnote-4)

DPA recommends that as part of any Disability Action Plan, RLDC should engage with disabled people over how to manage climate change and environmental issues that fall within its jurisdiction.

This includes building climate resilient infrastructure including flood protection works and blue-green networks that are accessible to everyone and prevent flooding and other hazards from unduly impacting on households where there are disabled people.

We also recommend that disabled people are involved as co-design partners in emergency responsiveness planning through both the RLDC and BOP Regional Council working alongside disabled people and disabled people’s organisations (including DPA) on all aspects of emergency response management, planning and policy making.

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| **Recommendation 2:** that as part of any Disability Action Plan, RLDC should engage with disabled people over how to manage climate change and environmental issues that fall within its jurisdiction. |
| **Recommendation 3:** that disabled people are involved as co-design partners in emergency responsiveness planning through both the RLDC and BOP Regional Council working alongside disabled people and disabled people’s organisations (including DPA) on all aspects of emergency response management, planning and policy. |

**b) Infrastructure**

Past DPA and disability community submissions to the RLDC have touched upon the need to significantly upgrade infrastructure including streets, roads, footpaths and walkways to make them fully accessible to everyone, including disabled people.

For local disabled people, more needs to be done by Council on accessibility issues, including the Te Manawa O Owhatiura safety improvements, Ngongotaha Village traffic safety and place-based improvements and Te Pūtake o Tawa track projects.

We also note that Council has proposed not to proceed with work around making rural street improvements ($1.4 million over 10 years), urban street improvements ($2.1 million over 10 years) and to Māori roadlines and unformed roads ($1.2 million over 10 years).

DPA has heard from some Rotorua members who are disappointed in Council’s proposal to remove $3.56 million from its contribution towards the creation of new walkways and cycleways. While shared pathways are admittedly difficult for disabled people to navigate for safety reasons, the creation of parallel but separate pedestrian and cycling spaces would still be fully possible if this funding were retained, even in the absence of an NZTA contribution.

DPA recommends that continuing to invest in street/road improvements that improve accessibility and safety should be an ongoing priority.

DPA recommends that the proposal to create no new cycleways and walkways is reversed by Council on the premise that parallel but separate pedestrian and cycling spaces are created.

DPA would also like to take the opportunity afforded by this submission to remind the RLDC that all footpaths must be built according to universal design standards and the New Zealand Transport Agency – Waka Kotahi’s ‘Pedestrian Network Design Guide.’[[4]](#footnote-5) Furthermore, it is essential that levels of service provided by infrastructure such as footpaths, road crossings, etc, be reviewed from time to time to ascertain when the original design levels of services are no longer adequate, and upgrades should be undertaken.

For new subdivisions, development contributions to enable existing infrastructure and services to handle growth should not only cover water services, but also transport connections, libraries and other facilities.

DPA recommends that any new bus infrastructure that will be funded in this LTP – especially bus stops – are built to universal design and best practice accessibility standards to ensure that they are fully accessible to everyone, including disabled people. Associated with this, RLDC and BOP Regional Council should collaborate with disabled people in doing so.

Universal design is an important standard as it not only provides inclusive access for everyone including disabled people but reduces costs in terms of the need to repurpose, retrofit or repair environments later.

We state this as bus stop accessibility is a significant issue for disabled people throughout the district. While bus services contracted by the Bay of Plenty Regional Council are generally good, the poor state of many stops and shelters has been commented upon by disabled people.

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| **Recommendation 4:** that Council continue to invest in street/road improvements that improve accessibility and safety as an ongoing priority. |
| **Recommendation 5:** that RLDC collaborate with BOP Regional Council and disabled people to improve bus stop and shelter accessibility using universal design accessibility standards. |

## 2. The future of housing and pensioner housing

## a) Housing

We mentioned earlier to the impact that Aotearoa’s housing crisis is having on disabled people and the high profile this issue has had in Rotorua’s case.

DPA believes that the homelessness crisis is entirely due to systemic factors. For disabled people, the lack of accessible housing is a significant contributor to housing insecurity. This is signified in 2018 data which found that 7.9% of disabled people were living in unsuitable or very unsuitable homes compared to 3.9% of non-disabled people.[[5]](#footnote-6) The negative effects of inadequate housing for disabled people have been well documented in numerous reports including in the “My Experiences, My Rights: A Monitoring Report on Disabled Persons Experience of Housing in Aotearoa New Zealand.”[[6]](#footnote-7)

Disabled people are also more likely to both be low-income earners than non-disabled people and face higher living costs due to disability.[[7]](#footnote-8) This is reflected in 2013 data (the latest available) from StatsNZ, which shows that disabled people are more likely to rent than non-disabled people with 38% of disabled people renting compared to 30% of non-disabled people.[[8]](#footnote-9) This renting gap has likely grown over the last ten years.

We acknowledge RLDC’s efforts in concluding the Rotorua Housing Accord with central government and Te Arawa Iwi representatives under the previous Labour Government in 2022. However, we note the current Coalition Government’s intention to negotiate a new accord between all three parties has created confusion for all parties involved.

Nevertheless, the intention to create a new accord does provide the opportunity for there to be full input from Rotorua’s disabled community into housing issues, especially around the need for new builds to be constructed to Universal Design (UD) accessibility standards.

One way of achieving more accessible house builds, particularly in the private and community sectors, would be through utilising development contributions, something that is already being done to incentivise housing builds to UD standards in Thames Coromandel District.[[9]](#footnote-10)

DPA recommends that RLDC introduce development contributions remissions to incentivise housing builds to universal design standards to raise the number of fully accessible homes.

DPA recommends that disabled people are involved in all aspects of housing policy in the RLDC area under the auspices of the Accord, including its eventual replacement.

## b) Pensioner housing

DPA notes the two options outlined in this LTP of either maintaining the current delivery model where council continues to fully control its pensioner housing stock or leasing it to a community housing provider (CHP).

Under the CHP model, tenants would be able to access income related rents through the Government’s Income Related Rent Subsidy (IRSS) scheme and wrap around social supports.

Under the status quo option, Council would remain directly accountable for the operation of pensioner housing, something that would be difficult under the CHP model. Opting for CHP leases would also mean that privatisation, in the form of selling council housing and associated land, would then become easier if Council chose to go down that route in the future, something that would concern many residents, including disabled people.

DPA acknowledges that tenants and community organisations will be consulted about both options and that, regardless of the operating model that Council decides on, there will be some form of wraparound support available for tenants regardless.

DPA recommends that disabled tenants of pensioner housing are directly involved in any discussions around the future of pensioner housing.

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| **Recommendation 6:** that disabled people are involved in all aspects of housing policy in the RLDC area under the auspices of the Rotorua Housing Accord. |
| **Recommendation 7:** that disabled tenants of pensioner housing are directly involved in any discussions around the future of pensioner housing. |
| **Recommendation 8:** that RLDC introduce development contributions remissions to incentivise housing builds to universal design standards to raise the number of fully accessible homes in the district. |

## 3. Aquatic Centre revitalisation

DPA welcomes the proposals to revitalise the Aquatic Centre.

Rotorua’s disabled community have been amongst those calling for the centre’s upgrade for many years, given the inaccessibility of much of the premises, particularly the changing areas.

DPA believes that the Aquatic Centre should be built to universal design accessibility standards, meaning that it would incorporate features like easy access to pools, changing areas, visual alarms, accessible signage, tactile sensors and the addition of a hydrotherapy pool.

DPA recommends that local disabled people and disability organisations are involved as co-design partners in the Aquatic Centre’s re-development.

To ensure that there is sufficient investment in creating an accessible, modern centre, we support the Full Stage 3 option as the best one to fund the redevelopment.

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| **Recommendation 9:** that local disabled people and disability organisations are involved as co-design partners in the Aquatic Centre’s re-development. |
| **Recommendation 10:** that the Full Stage 3 option is supported to fund the development. |

## 4. Building our reputation and our economy

**a) Inner City improvements**

DPA is pleased to see that Council intends to continue making improvements to the inner-city area to make the area a more attractive place for both residents and visitors.

However, we recommend that disabled people and disability organisations are made full co-design partners in this project alongside the business community and iwi.

Doing so would mean that accessibility is built into the Master Plan from the outset meaning that the by time it goes out to wider public consultation that inclusive design will have already been incorporated.

The involvement of disabled people as key stakeholders alongside iwi and business would mean that there would be fewer, if any, fixes required to make infrastructure more accessible if these were identified in the inner city in future, resulting in the project providing greater amenity and accessibility for everyone.

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| **Recommendation 11:** that disabled people and disability organisations are made full co-design partners in this project alongside Council, the business community and iwi. |

1. <https://www.stats.govt.nz/information-releases/disability-survey-2013/> [↑](#footnote-ref-2)
2. <https://newsroom.co.nz/2022/09/26/fully-accessible-housing-should-be-a-given-not-a-nice-to-have/> [↑](#footnote-ref-3)
3. <https://www.ehinz.ac.nz/indicators/population-vulnerability/what-are-vulnerable-populations/#people-living-with-a-disability> [↑](#footnote-ref-4)
4. <https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/walking-standards-and-guidelines/pedestrian-network-guidance/> [↑](#footnote-ref-5)
5. Lifemark (2017).  *Accessible Housing by the Numbers*. Retrieved May 26 2020, from:<https://www.lifemark.co.nz/news/accessible-housing-by-the-numbers/>    [↑](#footnote-ref-6)
6. <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-7)
7. Statistics New Zealand. (2020, October 28). *Measuring inequality for disabled New Zealanders*. Retrieved June 10, 2022 from <https://www.stats.govt.nz/reports/measuring-inequality-for-disabled-new-zealanders-2018#economic> [↑](#footnote-ref-8)
8. <https://www.stats.govt.nz/reports/disability-and-housing-conditions-2013> [↑](#footnote-ref-9)
9. <https://www.lifemark.co.nz/case-studies/thames-coromandel-district-council-incentivises-universal-design-housing/> [↑](#footnote-ref-10)