

May 2024

**To Wellington City 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

DPA welcomes the opportunity to give feedback on the Wellington City Council’s (WCC’s) Long-Term Plan (LTP) 2024-2034. DPA believes that it is essential that investment in council services and infrastructure be maintained and increased to ensure that the city’s infrastructure is resilient, fit for purpose and of a robust standard while being accessible for all who live in the city.

One of the central concerns of disabled people locally lies around accessibility, mainly to the physical and built environment (especially in areas controlled by Council), as well as council information, communications and services.

The need to plan for population growth must factor in the rising number of disabled people in the city. Official figures from 2022 show that there were an estimated 22% of Wellington City’s population (n=40,000) identifying as disabled people at that time.[[1]](#footnote-2)

We wish to congratulate the WCC on its initiatives to improve accessibility and inclusion for the city’s disabled community through, for example, the recent openings of more raised crossings, something that disabled people and others in the community have long lobbied for.

This submission traverses the need for an inclusive, accessible city which meets the needs of both present and future disabled Wellingtonians across the key proposals of:

* Investing in three waters network
* Waste collection and funding changes
* Other proposed changes

We also comment and make recommendations around what’s coming up in the future including those around proposed suburban parking charges, new cycle lanes and the Khandallah Swimming Pool.

The LTP should invest in initiatives which continue to bring the “Accessible Wellington: The Accessible Journey Action Plan 2019” to life. In doing so, the WCC will be meeting its obligations to disabled people under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), New Zealand Disability Strategy and Te Tiriti O Waitangi.

WCC needs carefully calibrate this LTP to ensure that it can deliver on the community outcomes and plans contained in this document and ensure that residents, particularly disabled people, are supported and not adversely impacted by any of the proposals contained within it.

## 1. Investing in three waters

DPA acknowledges the opportunities and challenges presented by the need to address the city’s Three Waters infrastructure, something that has been of immense concern and frustration for the city’s residents following the numerous, almost daily instances, of leaking pipes throughout the city.

DPA notes the WCC’s proposal to spend $1.2 billion on capital expenditure and $676 million on operational expenditure in relation to three waters over the next 10 years, a total of $1.87 billion.

We recognise that the debate over this issue (that has extended across both the previous government and into the new government’s term) has complicated matters for councils all around Aotearoa, including in Wellington.

The new Coalition Government’s decision to establish ‘Local Water Done Well’ as its main policy in this space means that local councils will carry more of the responsibility and cost of maintaining and upgrading ageing water infrastructure.

Disabled people, alongside everyone else, depend on water for everyday functioning and some people in the disabled community use higher than average amounts of water than in households with non-disabled people.

An example of this was reported in Christchurch where the mother of a disabled child complained to the city council there following her household being incorrectly charged an excess water rate despite having a medical exemption due to her son being incontinent and needing to be changed and showered constantly.[[2]](#footnote-3)

DPA is concerned that Wellington’s moves to install water meters in all private homes and businesses to measure usage signals an intent to bring in charging ordinary householders for water use as Auckland does.

In stating this, we recognise the role that water meters can and do play in being able to monitor water usage and, especially, when it comes to detecting any leaks.

We are particularly concerned that any water charging would unfairly penalise low-income households, who include a disproportionately high number of disabled people and would also penalise households that have high water usage due to the health or disability of a member of the household.

DPA recommends that if water charging is contemplated that consultation is undertaken with the community to ensure an equitable charging regime which takes these factors into account.

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| **Recommendation 1:** if water charging is contemplated then consultation must be undertaken with the community to ensure an equitable charging regime. |

## 2. Waste collection and funding changes

DPA notes the three options being outlined around waste collection and funding changes. It is essential that waste and recycling options be fully accessible to disabled residents.

One of the key issues is the need for waste services to safely collect medical waste from homes where disabled people and people with health conditions live.

DPA recommends that the waste and recycling system should incorporate free medical waste bins for households who request them so that medical waste can be safely disposed of.

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| **Recommendation 2:** that WCC incorporate free medical waste bins for households requesting them so that medical waste can be safely disposed of. |

## 3. Other proposed changes

## a.) Suburban parking changes – precinct parking fees proposal

Local disabled people are concerned about the proposal to impose parking precinct fees.

For disabled motorists and drivers carrying disabled people, there will be an inability to pay these charges given that many live on low incomes.

DPA acknowledges that the changes are aimed at encouraging better use of existing car parks, especially at busier times, but this may not be a suitable solution for everyone as some disabled people do have (and need) their own vehicles for convenience and accessibility.

DPA recommends that the WCC introduce more mobility parks as a means of addressing this issue as it would enable disabled people to park without charge.

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| **Recommendation 3:** that WCC introduce more mobility car parks for disabled users. |

## b.) Bike network and sustainable street changes

Associated with this are proposals being made by the WCC to introduce more cycle ways and reduce the number of parking spaces in parts of the city.

DPA acknowledges the importance of people taking up active transport modes including walking and cycling as a means of increasing wellbeing and to reduce climate emissions.

However, it is clear to us that the needs of disabled pedestrians have been ignored in the design of the proposed cycleways. There needs to be a re-design of cycle lanes so members of the community, including disabled people, can get out of their homes, cross safely, and feel safe. The current design ignores the needs of older and disabled people.

DPA recommends that disabled people are fully involved in discussions around any proposals to establish cycleways, particularly around their location and design.

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| **Recommendation 4:** DPA recommends that the WCC engage fully with disabled people in affected communities around any proposals to introduce cycleways. |

## c.) Khandallah Swimming Pool

DPA notes the two options of either closing Khandallah Pool for safety reasons and replacing it with a new, more accessible entranceway into Khandallah Park or rebuilding the pool completely by using a safer design.

DPA has no position on which option to take but we have recommendations that can be actioned irrespective of the option chosen.

If the first option of closing the pool and demolishing it is chosen, we recommend that any savings from doing so are invested in making the remaining Wellington pools more accessible and to also fund the creation of the proposed accessible entranceway to Khandallah Park.

If the second option of rebuilding the pool using an earthquake safe design is chosen, we recommend that it be re-constructed to universal design accessibility standards.

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| **Recommendation 5:** if the pool closure option is chosen, any savings from doing so should be invested in making the remaining Wellington pools more accessible and to also fund the creation of the proposed accessible entranceway to Khandallah Park. |
| **Recommendation 6:** if the pool rebuilding option is chosen, it should be re-constructed to universal design accessibility standards. |

1. <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/accessiblewgtn/files/survey-report/accessibility-action-plan-early-engagement-survey-report.pdf> [↑](#footnote-ref-2)
2. <https://www.stuff.co.nz/the-press/news/131412207/mum-sent-excess-water-charge-bill-despite-exemption-over-sons-disability> [↑](#footnote-ref-3)