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To Dunedin City Council

Please find attached DPA’s submission on the DCC Annual Plan 2022-23

Disabled Persons Assembly NZ

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# Introduction

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person’s organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people to be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

* telling our stories and identifying systemic barriers
* developing and advocating for solutions
* celebrating innovation and good practice

# The submission

DPA welcomes the opportunity to submit on the Dunedin City Council’s Annual Plan 2022-23. We note that Council is not conducting a full annual plan review process this year given that there are no substantial changes proposed which vary from the 10 Year Plan.

DPA is pleased to see some of the items we submitted on in last year’s Annual Plan being progressed. In fact, the DCC hosted a disability community-focused forum as part of its 10 Year Plan consultation programme and this was very successful. Hopefully, we can repeat this again if there is another significant Annual Plan consultation and when the next 10 Year Plan is required to be drawn up by Council again around 2024-25.

Amongst the items that DPA is particularly pleased to see movement on are:

* The new George Street CBD Retail Quarter Redevelopment which will make the area a more accessible one – we were pleased to have been part of ongoing co-design consultations around this and look forward to its completion in 2024.
* The new public toilet upgrades which have also just started, and we look forwards to seeing the first Changing Places toilet/changing facility opened in Moray Place this year.
* The new South Dunedin Library is about to commence construction and we hope that with strong disability voices having been involved in its planning, that it will be an accessible, inclusive facility for all.
* The first of the new proposed playground upgrades at Bathgate Park, South Dunedin which will see accessible, modified play equipment installed along with appropriate seating that will make it a modern community play space which is welcoming to both disabled children and adults.
* A commitment to construct all new DCC social housing to universal design standards and to ensure that about 10 percent of these are fully accessible with the rest able to be converted to being so [as universal design permits this] over time if need be.

We are pleased to see that all these projects have received impetus from what was an otherwise bleak event in the form of Covid-19. The need to maintain economic activity as well as build back better for the future in the wake of the pandemic will hopefully deliver us some more inclusive, accessible community facilities and spaces going forward.

Our recommendations are based around the Council’s questions on what residents would like to see it do better in the next phase of the ten-year plan, particularly when it comes to the next financial year and beyond.

**Climate Change Planning**

The first thing for us is to ensure that Council, when it comes to planning for climate change, needs to firmly engage with the disability community as we will be one of the most severely impacted population groups and this is already becoming evident globally.[[1]](#footnote-2) This is for a variety of reasons including the possibility that, at worst, disabled people, particularly those with mobility impairments, will be forced to move as part of any planned retreat, particularly from flat, low-lying communities in the future. We note the work that the DCC and ORC have started on the South Dunedin Future Project which aims to climate proof that community, which contains a high number of disabled people, from the worst vagaries of climate change.

Therefore, we would like to signal that we are keen to be more fully involved in the process of climate change planning going forward. To this end, DPA would like to recommend that a process like that deployed in Bristol, UK be used where their local council has engaged (and continues to engage in) climate change planning and dialogue with the local disability community. The city council there has co-developed a plan with the Bristol Disability Equality Forum (a Bristol-based disabled people’s organisation which is cross-impairment based like DPA) around climate change and its impact on disabled people which aims to address accessibility and other issues from an environmental/disability lens.[[2]](#footnote-3) As Dunedin progresses towards its next 10 Year Plan, something like this could be undertaken as a partnership between the DCC/ORC and disabled people to create a disability community climate change plan which would be incorporated into existing or updated climate change plans, such as the DCC’s own Climate Change Strategy. We wish to signal our interest in having Council start discussions around this now with the disability community so that this idea could be fully developed for inclusion in the next 10-year plan with appropriate funding to back this.

**Accessibility and Universal Design**

Secondly, and associated with this, is the need to think further about housing accessibility and how to ensure that universal housing design is entrenched into the building/construction sector’s thinking and that of Council’s as the lead planning/consenting authority. Therefore, we would like to see Council create an Environmental and Accessibility Performance Fund, along the lines of one that the Wellington City Council is in the process of creating to incentivise/encourage the developers of buildings and houses to build to both universal design and environmentally friendly standards.[[3]](#footnote-4) This WCC fund has been designed as an alternative to funding developers through remissions (discounts) on things like capital charges and consenting fees. As we approach the next phase of council’s planning cycle, DPA recommends that this idea be fully considered for inclusion in the next 10 Year Plan and this is especially timely given that the City’s Housing Strategy is currently being shaped up too.

Thirdly, DPA welcomes the proposal to develop a destination playground in Dunedin. We hope that this development will be built according to universal design principles and in a co-design partnership with disabled people and families/whanau of disabled children as well as disabled parents of children. We are keen that any destination playground avoids the accessibility issues which beset the Margaret Mahy Playground in Christchurch which, despite being planned and opened after the earthquakes, still disappointed the disability community as it was not as accessible as was expected to be and modifications had to be added by the Council later.[[4]](#footnote-5)

Fourthly, DPA notes the various efforts that the DCC have gone to in working with the Otago Regional Council on public transport issues over the last few years, especially. However, we note the considerable difficulties that persist because of the legislatively mandated division of responsibilities in the transport space around, for example, city and district councils being responsible for the construction and maintenance of public transport infrastructure such as bus stops while regional councils remain responsible for funding and overseeing the regulation of public transport services. In this respect, DPA gives its support to the Dunedin Tramways Union’s submission to this annual plan process that, in terms of the DCC’s responsibilities, ‘all proposed road works on a road that includes a bus stop be reviewed before work begins. If necessary, bus stops should be redesigned, and passed through the Traffic and Parking Bylaw Committee approval process.’ This would ensure that any design inconsistencies are removed which make it harder for older and disabled people to get on and off buses when planning and design go awry in these cases. As the Tramways Union states, doing this would save the DCC thousands of dollars a year which it could then shift into other areas of infrastructural need and, ultimately, improve accessibility to public transport for everyone in newly upgraded/constructed streets/roads.

### UNCRPD

The UNCRPD Articles most relevant to our submission are:

* Article 4.3: Involving disabled people and our organisations in decisions that affect us
* Article 9: Accessibility
* Article 19: Living independently and being included in the community
* Article 20: Personal mobility
* Article 21: Freedom of expression and opinion, and access to information
* Article 29: Participation in political and public life
* Article 30: Participation in cultural life, recreation, leisure and sport

New Zealand Disability Strategy 2016-2026:

* Outcome 5 - Accessibility
* Outcome 6: Attitudes
* Outcome 7: Choice and Control
* Outcome 8: Leadership

### Wider impact on Disabled People

DPA believes that if the suggested changes are considered and eventually put into place, that this will further increase the ability of disabled people to participate in and be full citizens of Dunedin.

# DPA’s recommendations

**Recommendation 1:** DPA recommends that the DCC working in collaboration with the ORC engages with the disability community through disabled people’s organisations which include DPA, on developing a Disability Community Climate Response Plan which would be incorporated into existing climate change plans/strategies.

**Recommendation 2:** DPA recommends that the DCC establish an Environmental and Accessibility Performance Fund to incentivise the planning and construction by private and organisationally based developers of environmentally friendly and universally designed housing and public buildings and spaces.

**Recommendation 3:** DPA recommends that the DCC in undertaking the planning and construction of any destination playground(s) build them to universal design standards and ensure the installation of accessible, inclusive play equipment and that this be budgeted for.

**Recommendation 4:** DPA recommends that the DCC in terms of its public transport responsibilities ensures that all proposed road works on a road that includes a bus stop be reviewed before work begins. If necessary, bus stops should be redesigned, and passed through the Traffic and Parking Bylaw Committee approval process, thereby permitting the Council to both save money and improve bus stop accessibility in the process.

# Conclusion

DPA hopes that this review of the 10-year plan’s progress at the year one stage will provide further food for thought as we progress towards the next ten-year planning cycle. It is hoped that through identifying further accessibility issues which impede the full inclusion of disabled people in the Dunedin community that we can get Council to act upon them in a way that involves disabled people in the co-design process. We look forward to seeing our recommendations acted upon.

1. 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#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report>.

   [↑](#footnote-ref-2)
2. Bristol Disability Equality Forum (2020). *Community Climate Action: Let’s Make Change with Bristol Disability Equality Forum*. Retrieved from (https://bristoldef.org.uk/community-climate-action/ [↑](#footnote-ref-3)
3. Wellington City Council. (2022, March 8). ORDINARY MEETING OF PŪRORO MAHEREHERE | ANNUAL PLAN/LONG-TERM PLAN COMMITTEE. Retrieved from AGENDA. <https://wellington.govt.nz/-/media/your-council/meetings/committees/annual-plan-long-term-plan-committee/2022/2022-03-08-agenda-apltp.pdf> [↑](#footnote-ref-4)
4. Murphy, E. (2016, May 8). Margaret Mahy playground to become accessible for children with disabilities. *Stuff.* <https://www.stuff.co.nz/the-press/news/79747057/margaret-mahy-playground-to-become-accessible-for-children-with-disabilities> [↑](#footnote-ref-5)