April 2024

**Tēnā koutou ki ngā kaimahi o Whangarei District Council**

Please find attached DPA’s submission on Long-Term Plan 2024–34

For any further inquiries, please contact:

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# Introducing Disabled Persons Assembly

**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

DPA welcomes the opportunity to engage with Whangarei District Council (WDC) on the Long-Term Plan 2024–2034.

With the cost-of-living crisis and inflation that has impacted both Aotearoa New Zealand and global economies, disabled people have been most impacted with the majority of whom live on low incomes in this country.[[1]](#footnote-2)

In the wake of these events DPA urges Whangarei District Council to focus on providing equity of service for disabled people across all services. This means that core services must be maintained and are accessible for disabled people.

## Accessibility, accessibility, accessibility … where is it?

DPA is concerned that accessibility appears to be largely invisible within the current document. This large-scale absence of a disability lens is disappointing given the existence of WDC Accessibility Policy and the WDC Disability Action Group.

This is why our submission focuses on running an accessibility lens over the LTP and our recommendations reflect this. We also note the absence in the LTP of the focus on Māori involvement in Council in relation to Te Tiriti o Waitangi, which we consider to be undemocratic.

DPA requests that all future LTPs and annual plans contain a disability impact assessment developed in partnership with WDC Disability Advisory Group. This would give both the disabled community and Council governance and officers an overview of the impacts future budgets and plans will have on disabled residents. Providing good levels of support for WDC staff working on accessibility at Council is also important. We support the recommendation that the levels of compensation for the WDC Disability Advisory Group be increased.

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| **Recommendation 1:** that all future LTPs and annual plans contain a disability impact assessment developed in partnership with WDC Disability Advisory Group. |

## Disability demographics

According to Statistics New Zealand’s 2013 Disability Survey, Tai Tokerau Northland had a disability population rate of 29 percent.[[2]](#footnote-3)

If the 2013 disability population numbers are overlain with the estimated 2023 total Tai Tokerau Northland population of 203,900, then there at least 59,131 disabled people currently residing within Northland.[[3]](#footnote-4)

This number is set to increase even further as the population ages as there is a strong correlation between ageing and disability. As at June 2023, 43,610 residents were aged 65 years, comprising 21 percent of the total population.[[4]](#footnote-5) This number is set to rise exponentially as Statistics New Zealand is forecasting that there will be 1,000,000 plus people aged 65 years and over living in Aotearoa by 2028.[[5]](#footnote-6)

The increasing number of disabled and older people is why all councils – including Whangarei District Council – should plan and invest in the development of fully accessible, inclusive communities.

## Equity for disabled people must be provided for

Currently there is not equity of access for disabled people to Council services and projects. Whichever funding option is chosen, there must be more investment in the following priorities that are important to Whangarei disabled community.

* Affordable, accessible, active public transport including essential road safety, walking and cycling improvements.
* Building and sustaining accessible, connected communities where everyone can live without barriers to their participation in terms of good housing, infrastructure, community facilities and parks.
* Developing a climate resilient, environmentally friendly Whangarei that can withstand the challenges of climate change and contribute to its reversal.
* Enabling the participation of disabled people in the economic life of Whangarei as workers, consumers, and entrepreneurs.
* Enabling the participation of disabled people in the artistic, cultural, sporting, recreational and social life of Whangarei.
* Ensuring that the voices of disabled people can be heard in all decisions, especially those that impact on our disabled communities across Tai Tokerau Northland.

The rest of our submission centres upon each of the key areas of the plan:

* water health/flood protection
* transportation
* parks and recreation
* community facilities and services
* planning and regulatory services
* climate resilience
* local businesses
* rates.

## Key areas of the LTP

### Water Health/Flood Protection

Disabled people were significantly impacted by last year’s flooding events in Whangarei with many gaining first-hand experience of the poor state of the water network. DPA welcomes the opportunity to comment on the Local Water Done Well Policy, which is currently being developed and would request that the follow areas be considered in its development that will enable them to cope with future extreme weather events:

* overland flow path management
* better protection and support of rural residents
* establish better flood intelligence/warning systems
* provide for stream rehabilitation
* community-led flood resilience
* increased maintenance of stormwater networks.

It is important that Council engages with all communities, including our disabled community, about how to make aspects of Local Water Done Well Policy fully inclusive and accessible. An example of this is ensuring that flood intelligence/warning systems are accessible to everyone including Deaf and disabled communities.

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| **Recommendation 2:** that Whangarei District Council conducts an accessibility audit on relevant aspects of the ‘Local Water Done Well Policy’ and that it engages with the disabled community when doing so. |

### Transport

The provision of public transport services is important for disabled Northlanders in terms of the ability to undertake social connection, inclusion and participation in their communities. It is also important to ensure that public transport is fully accessible.

We strongly urge that there is sufficient funding in the budget for that Whangarei Bus Passenger Services and CityLink Whangarei services to be accessible to fully realise their Accessibility Policy, which aims to remove barriers for everyone, including disabled people. Undertaking more investment in this space will ensure that more Whangarei residents – including disabled people – can enjoy the benefits of more modern, environmentally friendly, accessible buses as we move towards 2030.

DPA would really like to see other much needed safety education. From our perspective, the development of active transport modes is important for everyone, including disabled people as many of Whangarei disabled community are either walking or wheelchair/mobility device using pedestrians and need to mobilise safely. At this point, we want to reiterate the need for any walking, cycling or micromobility connections to be placed separately but parallel to one another for safety reasons.

DPA requests Council reconsider deferring the improvements to pathways such as the Tikipunga Shared Path, Walking and Cycling Projects, and other projects, which increases accessibility for our community.

Also in the transport safety space, there is a need for Council to continue investing in other road safety education which benefit everyone, including disabled people, such as pedestrian crossings where wheelchair users have had near misses with cars turning into them and disabled people being hospitalised.[[6]](#footnote-7) DPA asks for assessment of the speeds of the traffic light walking time frames in town. These are too fast for mobility impaired individuals to travel in the time given and pose a significant health and safety risk. We ask for a review of the Bank Street pedestrian crossing, which has also been identified as a site creating a high risk of incident between pedestrians and traffic.

The benefits of a more accessible, affordable transport could lead to reduced carbon emissions, regular usage of public transport, increased community involvement and increased people’s participation in organised public events.

DPA recommends that Whangarei District Council adequately fund CityLink so that it can reduce transport costs for disadvantaged groups, which includes disabled and older people.

DPA requests that Council to increase the number of disabled parking spots in key locations, but especially in the Town Basin car parks and CBD.

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| **Recommendation 3:** that Council fund road safety programmes with the additional assessment of the speeds of the traffic light walking time frames in town and review of the Bank Street pedestrian crossing. |
| **Recommendation 4:** that Council adequately fund CityLink so that it can reduce transport costs for disadvantaged groups, which includes disabled and older people. |
| **Recommendation 5:** that Council to commit to ongoing pathways improvements such as the Tikipunga Shared Path, Walking and Cycling Projects, and other projects which increases accessibility for our community. |
| **Recommendation 6:** that Council increase the number of disabled parking spots in key locations, but especially in the Town Basin car parks and CBD. |

### Total Mobility (TM) Review

Currently one of the biggest issues for disabled people in the transport space around the availability of Total Mobility funded services. Disabled people throughout the Whangarei region and elsewhere in Aotearoa continue to face significant challenges in being able to exercise transport choice, especially when it comes to accessing mobility taxis/small passenger vehicle services aimed at people using wheelchairs and mobility devices.

In 2023, media reports highlighted how the shortage of mobility taxi van services had reached crisis point nationally, and this included a Radio New Zealand website article featuring wheelchair user Barney Koneferenisi who expressed his frustrations on this subject. In the same story, small passenger service/taxi company providers pointed to prohibitively high set up costs[[7]](#footnote-8) as being one of the main reasons for this.

This factor exacerbated a driver shortage as many passenger service operators could not be persuaded into providing these services. And all this at the same time as the Waka Kotahi fund (jointly administered with regional councils) to subsidise small passenger service vehicle mobility conversions had not had much uptake as small passenger service providers claimed that the amount available did not fully cover the costs involved in vehicle conversion.

During this renewed crisis for the mobility transport system, Waka Kotahi announced a highly anticipated review of the Total Mobility (TM) Scheme[[8]](#footnote-9) to consider these and other issues that have surfaced around the scheme over the last decade.

However, the review could take around a year to deliver recommendations and then possibly a further year after that to begin implementing any changes. During that time, disabled people in Whangarei will still need access to affordable, accessible public transport options.

After that period, central government (via Waka Kotahi/NZ Transport Agency) and regional councils might then be able to agree on a more viable funding model for mobility vehicle conversions and TM services. Otherwise, DPA recommends that Whangarei District Council (and all Councils) await the outcomes of the national TM review before implementing any further changes.

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| **Recommendation 7:** that Whangarei District Council negotiate with Waka Kotahi on the contribution to the cost of fitting out all new mobility service passenger vehicles. |
| **Recommendation 8:** that Whangarei District Council await the outcome of the Total Mobility review before proceeding with any changes. |

### Parks and Recreation

DPA would like to remind Whangarei District Council of its obligations to ensure that the design of any new housing, public buildings, businesses, and public environments meets Universal Design principles.

Council investment in new assets including new parks and buildings would be positive from an accessibility standpoint as building new facilities would mean that they could be designed and constructed to Universal Design principles. This would allow Council to retire some older, less accessible facilities from use in favour of much newer, fully accessible and inclusive ones.

For Whangarei poorest communities, where many disabled people reside, this will enable boards in these areas to make greater investments in more accessible facilities and services.

DPA supports improvement of safety and inclusiveness for walkways and parks addressing accessibility for elderly and young who wander or run when taken out.

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| **Recommendation 9:** that Councils improve the safety and inclusiveness for walkway and parks addressing accessibility for older people, disabled people, and children. |

### Community Facilities and Services

DPA applauds WDC support of inclusive events in our community. Enhancing the creative aspects within the disability community is important and creates further avenues for Council to promote visitor attractions.

We ask that the disabled communities be given the opportunity to highlight their creative abilities at different festivals in Whangarei. Past public events have been either inaccessible or had limited accessibility for the disabled community, so an increase in awareness of the space needed for electric wheelchairs and mobility scooters for the event planners is a priority.

DPA supports micromobility businesses, for example the purple e-scooters for Whangarei residents, which reduces carbon emissions. This is to highlight that we support businesses but want to share the disabled communities’ concerns with the need for clear pedestrian access. Barriers for disabled people on pathways can include e-scooters, parked cars, rubbish bins, inorganic rubbish, shopping trolleys and other items which could cause potential damage to disabled people using wheelchairs, mobility scooters, walking frames and other mobility assistance devices.

DPA highlights the importance of regional sporting facilities as several Whangarei disability sports groups, organisations and community groups use these facilities. DPA wants Council to ensure sporting facilities are accessible and available with all new facilities and existing facilities built on the principles of Universal Design.

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| **Recommendation 10:** that disabled people be included in major non-disabled Council events in Whangarei. |
| **Recommendation 11:** that Council address the concerns of disabled needing clear pedestrian access. |
| **Recommendation 12:** that Council ensure that all sporting facilities are accessible and built on Universal Design principles. |

**Planning and Regulatory Services**

DPA recognises the need for central government to invest into the regional funding for the delivery of their programmes committed in the understanding that the maintenance of our environment is beneficial for the wellbeing of disabled.

Often disabled are an afterthought when structures are developed, and cars are prioritised over pedestrians as seeing mobility scooters tip over due to the large dips of car driveways on public pathways. Many disabled cannot access their community for the simple reason that the footpaths they use are damaged and are not being repaired, or there are delays in repairing them. DPA recommends thatCouncil ensures that the architects, landscape designers, engineering consultants, project management companies, placemaking agencies and infrastructure companies they work with are reminded of Council’s commitment to remove barriers to accessibility[[9]](#footnote-10).

Partnership of Māori disabled in the space of mana whenua and kaitiakitanga is also key in public transport roads and footpaths, water wastewater treatment, community engagement, climate action, waste management, economic development and regional facilities.

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| **Recommendation 13:** that Council ensures that the architects, landscape designers, engineering consultants, project management companies, placemaking agencies and infrastructure companies they work with are reminded of Council’s commitment to remove barriers to accessibility. |
| **Recommendation 14:** that the partnership of Māori disabled in the space of mana whenua and kaitiakitanga be included in the consultations. |

### Climate Resilience

The impact on the disabled community during last year's extreme weather events highlights the importance of climate resilience being an integral part of the Council plan. Creating climate resilience for disabled community is high priority as in times of a weather crisis, the disabled community are often an afterthought. The impact for disabled people is exacerbated by the fact that emergency services are not accessible for many with the community often bridging the gaps.

Preventing this situation re-occurring in the future will require planning for climate resilient communities and places that are also accessible for disabled people. As a recent news article states “Floods are inevitable. Flood disasters are not”.[[10]](#footnote-11)

DPA supports renewable energy, which is beneficial for a more climate resilient Whangarei, but it notes its concerns with Resource Management Act reforms being a step to fast-track consents for new infrastructure without considering the impacts on the environment.

DPA requests that WDC work with NRC and CDEM to establish a voluntary register for people with disabilities to identify special requirements in case of emergency or evacuation (e.g. medical, pets, equipment, mobility or sensory). People also need to know where their nearest or most appropriate accessible evacuation centre is, who to contact, and how to contact or mobilise themselves and others if access is blocked and/or phones are down with this information being publicised through WDC, disabled persons organisations, Tai Tokerau disability providers and personal networks.

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| **Recommendation 15:** that there be further community engagement around the impact on disabled people of extreme weather events. |
| **Recommendation 16:** that disabled have concerns the RMA reforms are a form of fast-tracking consents to bypass necessary environmental protections. |
| **Recommendation 17:** that WDC work in partnership with NRC to establish a voluntary register for disabled people to identify special requirements in case of emergency or evacuation and publicise information about emergency preparedness for disabled people through WDC, disabled persons organisations, Tai Tokerau disability providers and personal networks. |

### Local Businesses

Another area of concern for us is around accessibility of local businesses, with mobility parking spaces often occupied by non-disabled customers[[11]](#footnote-12). DPA would like to see Council work with Northland Chamber of Commerce to improve accessibility for disabled people to the local business environment to boost the regional economy, and support measures to ensure that mobility parking in private businesses are monitored more effectively.

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| **Recommendation 18:** that Council’s commitment to Universal Design be communicated to local businesses and mobility parking spaces be monitored effectively. |

### Rates

Disabled people in Northland face an increased risk of living in poverty largely due to lower incomes and extra resource requirements compared to non-disabled people[[12]](#footnote-13). Statistics also show that disabled New Zealanders are grossly overrepresented in unemployment rates; two-thirds of disabled people earn less than $30,000 per annum, increasing the likelihood of poor socio-economic outcomes[[13]](#footnote-14).

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| **Recommendation 19:** that Council make their rates rebates process more accessible for disabled people to apply. |

### Governance and Strategy

Accessibility is a core principle of the UNCRPD, and a key outcome of the Aotearoa New Zealand Disability Strategy. It affects every area of disabled people’s lives, from the homes we live in, the places we work and the extent to which we can move around our communities. It also has a major impact on disabled people’s level of risk and ability to recover following a natural disaster.

DPA supports appropriate development within sustainable environmental limits to protect the health, wellbeing, and economic opportunities of the disabled community in Aotearoa New Zealand. It is essential that disabled people can have input into the decision-making processes of projects that impact on our health and wellbeing.

DPA supports Council becoming a Northland Inc. Shareholder considering the impacts to the disability community and wherever possible that budgeting includes allowances for accessibility needs.

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| **Recommendation 20:** that disabled people can have input into the decision-making processes that impact on our health and wellbeing. |
| **Recommendation 21:** thatCouncil becoming a Northland Inc. Shareholder considers the impacts to the disability community and wherever possible that budgeting includes allowances for accessibility needs |

1. Figure.NZ. (n.d.) *Median weekly income for disabled people in New Zealand* *2017 Q2–2023 Q2* <https://figure.nz/chart/pXcWorfm74PV07bu> [↑](#footnote-ref-2)
2. Statistics NZ Disability survey: 2013. <https://www.stats.govt.nz/information-releases/disability-survey-2013> [↑](#footnote-ref-3)
3. Statistics NZ Subnational population estimates (RC, SA2), by age and sex, at 30 June 1996-2023 (2023 Boundaries). <https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979> [↑](#footnote-ref-4)
4. Infometrics Regional Economic Profile Northland Region 2023, Age composition of the population, 2023 (People, as at 30 June 2023) <https://rep.infometrics.co.nz/northland-region/population/age-composition> [↑](#footnote-ref-5)
5. Statistics NZ Subnational population projections, by age and sex, 2018(base)-2048 (2028 boundaries). [https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979#](https://nzdotstat.stats.govt.nz/wbos/Index.aspx?DataSetCode=TABLECODE7979) [↑](#footnote-ref-6)
6. Piper, D. (Oct 2023, 18). *Victim left seriously injured after alleged hit-and-run on mobility scooter*. Stuff website. <https://www.stuff.co.nz/national/crime/133140103/victim-left-seriously-injured-after-alleged-hitandrun-on-mobility-scooter> [↑](#footnote-ref-7)
7. Forman, L. (Dec 2023, 19). *Money set aside for wheelchair taxis not being spent*. RNZ website. <https://www.rnz.co.nz/national/programmes/checkpoint/audio/2018920173/money-set-aside-for-wheelchair-taxis-not-being-spent> [↑](#footnote-ref-8)
8. Te Manatū Waka Ministry of Transport Total Mobility Scheme Review (n.d.) <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/review-of-the-total-mobility-scheme/> [↑](#footnote-ref-9)
9. Whangarei District Council. (2014). *Accessibility Policy 2014.* <https://www.wdc.govt.nz/files/assets/public/v/1/documents/council/policies/accessibility-policy.pdf>

   [↑](#footnote-ref-10)
10. Smith, R. (February 2023, 3). *Floods are inevitable, flood disasters are not.* Stuff website. <https://www.stuff.co.nz/opinion/131138570/floods-are-inevitable-flood-disasters-are-not> [↑](#footnote-ref-11)
11. CCS Disability Action. (n.d.) *Opinion: Great ways to abuse mobility parking, and why you shouldn’t* <https://www.ccsdisabilityaction.org.nz/news/mobility-parking-abuse> [↑](#footnote-ref-12)
12. Wilkinson-Meyers et al. (2015). To live an ordinary life: resource needs and additional costs for people with a physical impairment. Disability & Society, 30(7), 976-990. [↑](#footnote-ref-13)
13. 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-14)