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To Wellington City Council

Please find attached DPA’s submission on the Draft Annual Plan 2022/23

Disabled Persons Assembly NZ

Contact:

**Chris Ford**

**Regional Policy Advisor**

**Acting Kaituitui – Wellington**

**Disabled Persons Assembly NZ**

**Phone: 027 696 0872**

**Email:** [**chris.ford@dpa.org.nz**](mailto:chris.ford@dpa.org.nz)

# 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 Wellington City Council Annual Plan 2022-23. We strongly support the proposed Environmental and Accessibility Performance Fund and removing charges for all overdue library books. We make several recommendations on the Council’s plan for its social housing stock, and the need for Council to budget for universal design when it comes to infrastructural projects, including the new Khandallah summer pool.

**Environmental and Accessibility Performance Fund**

DPA welcomes the fact that Council has formally made a proposal in this annual plan to establish an Environmental and Accessibility Performance Fund to support developers in creating universally designed, accessible and environmentally friendly building and housing in the city. We fully support this proposal due to the dire shortage of accessible housing for disabled people in the Wellington region.

**Removing overdue charges on library books**

DPA welcomes Council’s proposal to remove all overdue charges on borrowed books and other resources across all its libraries. We understand that this is in line with similar moves made by other councils around Aotearoa. Removing charges will especially benefit disabled people, given that a substantial number of us live on low incomes and rely on free resources from public libraries.

**Proposal to create Community Housing Provider (CHIP)**

DPA notes that Council is proposing to establish a Community Housing Provider (CHIP) to operate the Council’s social housing service, which would replace City Housing Services (CHS). The Council’s case is that establishing a CHIP will enable it to access Income Related Rental Subsidies (IRSS) more easily for tenants who cannot do so at present. We recognise that the current system is both difficult for tenants who often pay more than 25 percent of their income in rent and Council who are making substantial, un-sustainable losses on its housing portfolio.

DPA recommends that if Council opts to create a CHIP to control its housing portfolio, it should do so on the proviso that it does not create the same issues experienced with setting up similar structures in other parts of the country. In Christchurch, for example, the City Council in setting up the Otautahi Community Housing Trust (OHCT) there has done an excellent job in supporting its tenants through establishing wraparound supports and taking a tenant-centric approach. However, two-thirds of OHCT tenants remain ineligible for IRSS subsidies as only new tenants who took up tenancies after the new trust structure was put into place in 2016 are eligible for them.[[1]](#footnote-2) Therefore, DPA recommends that Council continue to lobby Government over making the IRRS subsidy available to all local authorities and that this should be the case regardless of the structures any council uses to provide social housing.

**Governance**

DPA recommends that tenants should have full democratic representation on any governance bodies established to oversee the either the existing CHS or any new CHIP. Further, DPA recommends that disabled tenants must be appointed to council housing governance roles alongside representatives from other housing marginalised groups including Maori, Pasifika, tamariki/youth, older people, women, LGBTI+ and low-income workers/earners.

DPA realises that there will be a need to upskill some people from these groups in governance to enable them to participate in decision making and recommends that there be funding and support made available for this to occur

The affordability of things such as, for example, replacing lost keys and home repairs for council tenants needs reviewing as well, and this should happen regardless of who operates council housing going forward. A Wellington member recounted her experience of supporting two disabled council housing tenants who were charged excessively high fees by CHS for things like repairing an accidentally damaged wall and replacing a set of lost keys, outlays which they are still paying off in instalments from their benefits.

**Accessible Housing**

Irrespective of whether Council opts for continued direct control or creates a CHIP, the need to create accessible housing must be addressed. DPA has been encouraged through recent engagement between us, the Council’s Accessibility Advisory Group (AAG) and Council officers on moves to make more of its social housing stock accessible, using universal design (UD) standards under its Te Kainga programme. Nevertheless, the WCC must increase the rate of its share of UD housing construction over the next year as the current housing shortage in the city continues to have a dire impact on disabled people as every day more of us are added to the social housing wait list.

**Universal design for proposed infrastructure projects**

DPA sees that there are several community infrastructure projects on the horizon, some of which are part of this annual plan. The proposed upgrade of the Khandallah Summer Pool and other planned projects, for example, must be designed and built to universal design standards, thereby enabling everyone to have access to this and other community facilities.

DPA recommends that Council must include the costs of incorporating universal design as part of all capital project budgets. DPA also recommends that Council engage in co-design processes around all infrastructure projects by fully involving disabled people, disabled people’s organisations (including DPA), the Council’s Accessibility Advisory Group (AAG) and other relevant stakeholders in them.

DPA would also like to ask as to whether the WCC has applied to Government for funding from its “Better Off” fund which is available to support councils wishing to upgrade social, recreational, and other essential infrastructure as part of Covid-19 recovery projects. If this has been the case, then we welcome this but if not, then Council should take up this opportunity while it exists.

### 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 30: Participation in cultural life, recreation, leisure and sport

New Zealand Disability Strategy 2016-2026:

* Outcome 5 - Accessibility

### Wider impact on Disabled People

DPA believes that if our recommendations around housing, the universal design of projects and the Environmental and Accessibility Performance Fund are all adopted, that they will make positive contributions towards creating the inclusive and accessible city that disabled Wellingtonians want to live in and visitors feel welcomed to.

# DPA’s recommendations

**Recommendation 1:** DPA recommends that should Council decide to establish a Community Housing Provider (CHIP) that it does so on the proviso that it can access Income Related Rent Subsidy (IRRS) for all its social housing tenants without exception from day one.

**Recommendation 2:** DPA recommends that Council continue to actively lobby Government over making the IRRS available to all local authorities across the country to support their social housing tenants and for this be available regardless of the structures which any council uses to provide social housing through.

**Recommendation 3:** DPA recommends that Council, regardless of the final structure it decides on for social housing, appoint tenant representatives from socially marginalised groups including disabled tenants to any social housing governance entity and provide support for the upskilling of tenant representatives through governance training.

**Recommendation 5:** DPA recommends that all Council infrastructure projects incorporate budget lines for universal design, and that it also applies to the Government’s “Better Off” Fund if it has not already done so.

**Recommendation 6:** DPA recommends that Council fully engages in co-design processes around all proposed capital projects with disabled people, disabled people’s organisations (including DPA), the Council’s Accessibility Advisory Group and other relevant stakeholders.

# Conclusion

DPA welcomes the WCC’s Annual Plan on the proviso that Council adopts our recommendations which aim to build the voices of disabled and other disadvantaged people into housing and infrastructure design decisions and improve the availability and affordability of accessible housing. DPA, through its Regional Policy Advisor/Acting Wellington Kaituitui, is available to be reached out on the proposals in this plan and other forthcoming council initiatives. We wish to be heard at the upcoming oral hearings regarding this submission.

1. [↑](#footnote-ref-2)