



# PARENTS OF VISION IMPAIRED (NZ) INC

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*Providing a community to support parents of children with vision impairments*

18 August 2025

Committee Secretariat  
Governance and Administration Committee  
Parliament Buildings  
Wellington

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Tēnā koe,

Please find attached a submission from Parents of Vision Impaired NZ on the **Local Government (System Improvements) Amendment Bill**.

We would like to speak to this submission.

Ngā mihi,

Rebekah Graham

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## ABOUT PARENTS OF VISION IMPAIRED NZ

Parents of Vision Impaired NZ (PVI) is a registered charity which supports parents who have blind, low vision, or vision-impaired children. There is no cost to enrol, and we provide a supportive community for parents who are overcoming challenges every day. We offer parents advice, information, and opportunities to meet other parents. We publish a quarterly newsletter (eVision) and have a members-only Facebook page for families and whānau to share information and to network. PVI also runs an annual conference which allows parents and whānau to get together face to face for a longer time to talk, listen and learn in a social setting. PVI takes an active part in the disability sector through making sure that the voice of visually impaired children and their parents is heard in consultations with government, schools, local councils, and other organisations.

## ABOUT THE BILL

The Local Government (System Improvements) Amendment Bill proposes a range of amendments to the Local Government Act 2002 to reduce pressure on council rates by:

- refocusing the purpose of local government; and
- better measuring and publicising council performance; and
- prioritising core services in council spending; and
- strengthening council accountability and transparency; and
- providing regulatory relief to councils.

## PVI'S APPROACH

PVI takes a whole of life approach with the understanding that disabled children and whānau should have a say about outcomes that affect them. In doing so, we draw on key components of the following:

**New Zealand Bill of Rights Act (1990).** This Act states that everyone has the right to be free from discrimination from government and state officials, including with regards to education and on the grounds of disability.

**International conventions.** Aotearoa New Zealand is a signatory to United Nations conventions that emphasise disabled peoples' rights. As such, governments are required to undertake all appropriate legislative, administrative, and other measures for the implementation of the rights recognized in the following conventions:

- **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD):**
- **United Nations Convention on the Rights of the Child (UNCRC).**

**NZ Disability Strategy (2016-2026)**<sup>1</sup> is the Government's primary vehicle for implementing the UNCRPD and includes the NZ Disability Action Plan<sup>2</sup>. Of interest to this submission are the Outcomes **Choice and Control**, **Leadership**, and **Accessibility**.

**Enabling Good Lives Principles**<sup>3</sup>. The following principles are particularly relevant:

- *Self-determination:* Disabled people are in control of their lives.
- *Ordinary life outcomes:* Disabled people are supported to live an everyday life in everyday places; and are regarded as citizens with opportunities for learning, employment, having a home and family, and social participation - like others at similar stages of life.
- *Mana enhancing:* The abilities and contributions of disabled people and their families are recognised and respected.

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<sup>1</sup> Office for Disability Issues. *New Zealand Disability Strategy*. Accessed from: <https://www.odi.govt.nz/nz-disability-strategy/>

<sup>2</sup> See <https://www.odi.govt.nz/disability-action-plan-2/>

<sup>3</sup> See <https://www.enablinggoodlives.co.nz/about-egl/egl-approach/principles/>

## OUR SUBMISSION

We **oppose the Local Government (System Improvements) Amendment Bill** as currently drafted. While we acknowledge the intent to reduce pressure on rates and improve council performance, the proposed reforms will have the opposite effect for disabled people: reducing accessibility, excluding disabled voices, and limiting councils' ability to respond to diverse community needs.

## OUR CONCERNS

While the Bill claims to reduce pressure on council rates and improve council performance, PVI notes that the proposed changes will undermine the ability of local councils to meet the needs of disabled local residents. The key areas of concern are as follows:

### **Removal of the “Four Well-beings”**

The bill removes councils' responsibility to consider social, economic, environmental, and cultural well-being. For disabled people and their families, these provisions were critical: they recognised that council roles extend beyond infrastructure to fostering inclusive communities, accessible public spaces, and cultural participation. Removing this broader mandate and requiring councils to narrow their focus to “core services” such as roading and water, means that there will be a neglecting of the investment in accessibility, inclusive design, and disability-friendly facilities.

### **Exclusion of Disability Voices**

By narrowing the purpose of local government to “core services” and emphasising efficiency, the Bill risks marginalising community wellbeing, inclusion, and accessibility. Disabled people and their families rely on councils for accessible transport, inclusive playgrounds, footpath safety, community facilities, and accessible communications. If these are deprioritised, disability voices will be further silenced.

New requirements for performance measures (e.g., contractor expenditure) could be broadened to include accessibility and equity indicators. At present, the bill misses an opportunity to hold councils accountable for progress on inclusive and accessible services.

**Impact:** Disability inclusion risks remaining invisible in council reporting and performance monitoring.

### **Reduced Accessibility**

Disabled people already face significant barriers in accessing council services and public spaces in Aotearoa New Zealand<sup>4</sup>. If councils are forced to limit their focus, accessibility and inclusion initiatives will be among the first to be cut, undermining obligations under both the UN Convention on the Rights of Persons with Disabilities (UNCRPD) and the New Zealand Disability Strategy.

**Impact:** Disabled people face increased exclusion, reduced locally accessible infrastructure, and find it harder to participate in community life. Families who are already carrying additional costs, may have to increase this cost burden when councils do not provide accessible services.

### **Narrowing Council Spending Priorities**

Councils will be required to give “particular regard” to network infrastructure and core services. Services that matter to disabled people and families, such as accessible public transport, libraries, community facilities, and inclusive recreational opportunities, are deprioritised under this narrow focus.

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<sup>4</sup> Office for Disability Issues. (2020). *Findings of the National Local Authority Survey on Accessibility*. Wellington: New Zealand Government. <https://www.whaikaha.govt.nz/assets/News/old-ODI-content/2020-06-18-Findings-of-the-National-LA-Survey-on-Accessibility.pdf>

**Impact:** Disabled children and whānau experience fewer opportunities for social connection, education, and recreation, leading to greater isolation. Long-term this leads to poorer outcomes for disabled persons.

### **Central Government Overreach Without Funding**

Central government control over local government functions should not be increased unless accompanied by increased central funding. Currently, councils are expected to meet wide-ranging needs with limited revenue streams (mainly rates). If central government narrows councils' mandate without providing additional funding, disabled communities will lose vital opportunities for advocacy, co-design, and accessible service provision.

While improved performance and transparency are positive, the bill centralises decision-making with the Secretary for Local Government, with limited recognition of community diversity. The removal of the requirement to consider *tikanga Māori* in CCO director appointments further erodes equity commitments. Local disabled persons and their families will bear the cost if councils are forced to cut services.

If central government narrows councils' mandate without providing additional funding, disabled communities lose opportunities for advocacy, co-design, and accessible service provision. International evidence shows that when local governments are stripped of autonomy without adequate resourcing, equity and inclusion initiatives are disproportionately undermined<sup>5</sup>. In Aotearoa, scholars have already cautioned that reducing local government's wellbeing role risks silencing diverse communities and weakening democratic responsiveness<sup>6</sup>.

**Impact:** Governance that does not actively consider inclusion weakens local democratic process, perpetuates barriers, and creates additional costs for disabled people and families.

**The National Local Authority Survey on Accessibility** report by the Office for Disability Issues (2020)<sup>7</sup> assessed how councils are progressing on accessibility across areas like leadership, transport, participation, and public spaces. They found that:

- 39% of councils rated accessibility of participation processes as “developing.”
- Only ~30% reported disabled people are “at the table” in significant decision-making; just 13% of councils employ disabled people in leadership roles.
- 74% of councils rated transport accessibility as less than “good,” highlighting widespread gaps.

Local councils already lack adequate accessibility frameworks and consultation practices. Reducing their obligations without funding support is likely to degrade outcomes further. The proposed Bill risks further excluding disabled people because of its austerity focus.

## **HOW THE BILL FAILS TO UPHOLD THE UNCRPD**

**Violation of State Obligations (Article 4):** The Bill's failure to specify that reforms must protect or enhance disability inclusion contravenes the UNCRPD's general obligation for States to **actively ensure** the full realization of disabled persons' rights. Unless the Bill explicitly embeds disability considerations in performance metrics,

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<sup>5</sup> Ryan, F. (2019). *Crippled: Austerity and the Demonization of Disabled People*. London: Verso.

<sup>6</sup> Bevan, P. (2021). Local government, wellbeing, and inclusion in Aotearoa New Zealand. *Policy Quarterly*, 17(1), 27–34. <https://ojs.victoria.ac.nz/pq/article/view/6911>

<sup>7</sup> Source: <https://www.whaikaha.govt.nz/assets/News/old-ODI-content/2020-06-18-Findings-of-the-National-LA-Survey-on-Accessibility.pdf>

governance responsibilities, and consultation frameworks (with corresponding funding) the State is effectively abdicating its duty.

**Threat to Accessibility (Article 9):** The Bill's push to relax regulatory requirements and limit "non-core" services risks sidelining accessibility initiatives. For instance, funds and efforts for accessible infrastructure, transportation, communication formats, and inclusive public spaces may be deemed outside "core services" and deprioritized. Without explicit statutory backing for accessibility, councils under financial or administrative pressure may scale back or eliminate crucial programs, undermining the UNCRPD mandate for accessible public services.

**Jeopardizing Independent Living (Article 19):** Centralizing control without proportional funding makes it difficult for councils to maintain local services and supports for independent living. Local tailoring of services is often the only way to meet diverse accessibility needs. A one-size-fits-all central direction risks reducing choices and inclusion in local communities.

**Erosion of Meaningful Participation (Article 29):** By narrowing the purpose of local government and focusing oversight on cost efficiency and central performance metrics, the Bill risks shrinking the scope of public consultation. Disabled people and representative organizations may be excluded from decision-making processes, eroding their right to participate effectively in "political and public life on an equal basis" with others.

In its current form, the Local Government (System Improvements) Amendment Bill places councils at risk of deprioritizing accessibility, sidelining disabled voices, and eroding their capacity to support inclusive, independent living. This runs directly counter to the UNCRPD's Articles 4, 9, 19, and 29. If the Bill does not embed disability inclusion at its core it risks failing New Zealand's obligation under international law.

#### HOW THE BILL FAILS TO UPHOLD THE DISABILITY STRATEGY:

The Strategy's vision is for New Zealand to be a **non-disabling society**. The Bill's push to tighten council mandates and reprioritize "core services" risks sidelining the outcomes of **accessibility, choice and control, and leadership by disabled people**. Without explicit provisions for ensuring councils maintain accessible consultations, infrastructure, and responsiveness, the Bill undermines the Strategy's vision of a non-disabling society built on collective responsibility.

#### HOW THE BILL CONTRAVENES EGL PRINCIPLES:

**Undermining Self-determination & Person-centredness:** By narrowing council roles and reducing flexibility, the Bill jeopardizes disabled people's ability to shape local services that reflect their individual needs and aspirations.

**Ignoring Mainstream First & Ordinary Life Outcomes:** Streamlining services to cost-efficiency may see councils scale back inclusive community infrastructure and universal access, undermining disabled people's integration into everyday community life.

**Blocking Easy-to-use & Relationship Building Supports:** Regulatory relief and a tight focus on efficiency risk making council processes (e.g., consultation, performance reporting) less accessible and less supportive of relationship-driven engagement.

By failing to integrate these frameworks, the Amendment Bill risks reversing decades of progress toward inclusive, responsive governance. Embedding the NZ Disability Strategy vision and EGL's principles into the Bill is essential to honour New Zealand's legal and ethical obligations toward disabled people.

## RECOMMENDATIONS

To align with the UNCRPD, the NZ Disability Strategy, and the EGL principles, we recommend that the Bill be amended to:

1. Recognise accessibility and disability inclusion as a “core function” of local government.
2. Require and allow funding for inclusive consultation practices.
3. Include accessibility and inclusion in performance measures, not only financial efficiency.
4. Require central government to provide additional funding whenever greater control or regulatory relief is imposed in order to protect disability supports.
5. Ensure alignment with national disability frameworks and legislative obligations so that councils retain flexibility to meet diverse community needs.

## FINAL COMMENTS

PVI opposes the Local Government (System Improvements) Amendment Bill in its current form. The proposed changes risk excluding disabled voices, reducing accessibility, and diminishing the ability of local councils to respond effectively to disabled communities.

Any reforms to local government must prioritise inclusion, accessibility, and adequately funded local decision-making to protect the rights and wellbeing of disabled New Zealanders.

## FURTHER READING

- Bevan, P. (2021). Local government, wellbeing, and inclusion in Aotearoa New Zealand. *Policy Quarterly*, 17(1), 27–34. <https://ojs.victoria.ac.nz/pq/article/view/6911> (Examines the risks of narrowing local government functions.)
- Committee on the Rights of Persons with Disabilities. (2018). *General comment No. 7 (2018) on the participation of persons with disabilities, including children with disabilities, through their representative organizations, in the implementation and monitoring of the Convention*. United Nations. <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G18/285/01/PDF/G1828501.pdf> (Guidance on ensuring meaningful participation of disabled people in decision-making)
- Disability and Critical Health Psychology: Applications for Work and Everyday Life* (Graham & McGuigan, 2025), featured in *Critical Health Psychology: Foundations, Approaches and Applications* – an open-access textbook exploring equity-focused and applied psychological perspectives. [Read more here](#)
- Ryan, F. (2019). *Crippled: Austerity and the demonization of disabled people*. Verso. (shows how cost-cutting reforms disproportionately harm disabled people)
- Shakespeare, T. (2014). *Disability rights and wrongs revisited* (2nd ed.). Routledge. (A comprehensive overview of disability rights theory and practice)
- Stace, H., & Sullivan, M. (2020). *A brief history of disability in Aotearoa New Zealand*. <https://www.disabilitysupport.govt.nz/assets/History-of-Disability-in-Aotearoa-NZ-final1.pdf>
- World Health Organization, & World Bank. (2011). *World report on disability*. World Health Organization. <https://www.who.int/publications/i/item/9789240685215> (A landmark report with data and recommendations on inclusion, accessibility, and governance)