April 2022

To Christchurch 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**

**Disabled Persons Assembly NZ**

**Phone: 027 696 0872**

**Email:** **chris.ford@dpa.org.nz**

**Ingrid Robertson**

**Kaituitui – DPA Christchurch**

**Phone: 021 965 355**

**Email:** **Christchurch@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 Christchurch City Council’s Annual Plan 2022-23. From our perspective, Council has moved to implement several positive initiatives during the past year.

These have included beginning to implement the Ōtākaro Avon River Corridor (OARC) Activity Plan. We note from the annual plan that Council is intending to work with the community and Ngāi Tahu (and Ngāi Tūāhuriri as mana whenua) on how to best use this area. DPA would like to be included, alongside other disabled persons organisations, as one of the stakeholders alongside Te Tiriti and other community partners in any decisions around doing so, to ensure that the area is accessible to everyone.

DPA is pleased, as an organisation which works to the principles of Te Tiriti, that the Council is working to build its own partnership with iwi and mana whenua to ensure that the views and values of Māori are considered when making decisions on activities across the city. In this sense, we want to see the voices, perspectives and hopes of disabled Māori raised within Council policy and decision-making processes as well.

One significant move that we wish to commend Council for is its decision to stop charging for library overdue items. This move will benefit many disabled people who sometimes have accessibility issues with returning borrowed items and given that many within our community are on low incomes, it will be a very welcome one indeed. This move brings Christchurch into line with other local authorities in Aotearoa including, for example, Dunedin who have dispensed with late fees as well.

DPA acknowledges that there are not any significant changes in this year’s annual plan. However, we do wish to emphasise some key issues that we either wish to reiterate or seek clarification upon.

The first is around the proposal to defer/delay some previously planned capital spending. DPA believes that any deferred or delayed spending should not be at the expense of meeting accessibility requirements. Indeed, DPA believes in the principles of universal design when it comes to capital developments such as buildings, footpaths, and other infrastructure. Indeed, DPA recommends the use of Universal Design principles in the design and construction of public buildings, spaces and places and this includes outdoor playgrounds and parks. Across all local authorities in Aotearoa, Auckland Council is leading the way in this respect and has published useful guidelines on this subject.[[1]](#footnote-2)

The second point is also based around infrastructure and, more specifically, the Council’s plan to maintain the upkeep of roads, facilities, and footpaths up to standard. DPA welcomes this commitment given the economic pressures this country is facing.

In respect of these first two points, DPA would like to ask as to whether Council has any intention of applying for “Better Off” funding from central government to fund projects which the community considers to be important in terms of, for example, swimming pools, gardens, libraries and community centres, etcetera? If not, DPA would like to recommend that Council does so.

In respect of another key infrastructure project highlighted in the annual plan, the Edgeware Pool Project, DPA alongside other local disabled persons organisations would like to be involved in co-design discussions with Council and the St Albans Pavillion and Pool Incorporated about this. Similarly, we will be lobbying for the pool complex to be constructed to universal design standards.

The third is around proposed rates increases. Rates increases will primarily impact upon people on low or fixed incomes who are either homeowners or private sector renters, many of whom will be disabled people. Disabled people have higher disability related costs when it comes to daily living and given the current cost of living crisis, many will be particularly hard pressed if they are rate payers or renters to meet increased rates demands and/or rent increases stemming from this. At the same time, we acknowledge that Council has kept rates increases within the current rate of Consumer Price Index (CPI) inflation. Therefore, Council should actively lobby Government to increase the level of rates rebates for low-income ratepayers from its current maximum of $665.00 per year as a means of providing additional support. If central government were to do this, then rates would be able to remain within inflation thereby maintaining a steady revenue base for the CCC which, in turn, will allow it to continue providing the full range of public services it currently does, including to disabled people who are more likely to rely upon them.

The fourth is around the proposals to change swimming pool and leisure centre entry fees. DPA is pleased to hear that work on both the Hornby and Parakiore sites is progressing and that the proposal to change the charges is completely understandable given the need to standardise them across all seven council owned complexes. We are also pleased to see that there are proposed fee reductions or even no swim charges being applied for children, and this move will benefit families/whanau with disabled children too. However, we would like to clarify as to whether further discounted concessions will be made available by Council to people who use Hāpai, Community Services or Super Gold cards given these proposed reductions?

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 commends the Council’s annual plan and believes that if it continues to resource essential infrastructure maintenance and services, then this will have a positive impact on disabled people’s ability to participate fully in the Christchurch community.

# DPA’s recommendations

**Recommendation 1:** DPA recommends that all capital and infrastructure budgets, particularly those relating to public buildings, housing, car parks and footpath maintenance, incorporate funding for universal design upgrades within these budgets.

**Recommendation 2:** DPA recommends that Council apply for ‘Better Off’ funding from central government if it has not already done so to fund infrastructure projects which are desired by the community.

**Recommendation 3:** DPA recommends that Council, mana whenua and relevant organisations involved in the Ōtākaro Avon River Corridor (OARC), and Edgeware Pool developments involve us, disabled people, and our disabled people’s organisations in co-design-based discussions on them.

**Recommendation 4:** DPA recommends that Council actively lobby central government to increase the level of rates rebates available to low- and fixed-income homeowners to relieve the impact of rates increases on this group, many of whom will be disabled people.

**Recommendation 5:** DPA seeks clarification as to whether Hāpai, Community Services or Super Gold card holders will be eligible for further concessions at Christchurch’s public swimming pools in line with plans to further reduce leisure centre and swimming pool charges as proposed in this annual plan.

# Conclusion

DPA sees this annual plan as another step in the recovery of the city from both the Covid-19 pandemic and the earthquakes of ten years ago. Our aim is that Otautahi-Christchurch becomes a fully accessible and inclusive city for all who live in it and who visit. Both our Christchurch Kaituitui and Regional Policy Advisor are available to be reached out to for further discussions around this plan. We would also like to make an oral submission in support of it.

1. Auckland Council. (n.d.) *Auckland Design Manual.* Retrieved from <https://www.aucklanddesignmanual.co.nz/design-subjects/universal_design> [↑](#footnote-ref-2)