

November 2024

**To Christchurch City Council**

Please find attached our submission on the Draft Coastal Hazards Adaptation Plan

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# Introducing Disabled Persons Assembly NZ

**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

DPA welcomes this opportunity to give feedback to the Christchurch City Council (CCC) on the Draft Coastal Hazards Adaptation Plan for Whakaraupō Lyttleton and Koukourarata Port Levy 2024.

# Nature is core to the wellbeing of all people and is critical in keeping us emotionally,

# psychologically and physically healthy.[[1]](#footnote-2) Disabled people value access to our coasts

# as it is beneficial for our mental health.[[2]](#footnote-3) In addition to this, Māori disabled connect to the whenua through whakapapa which places an extra value on its importance. It is important to remember these things when understanding community values and

# connections to the coast.[[3]](#footnote-4)

# With an increasing number of disabled and older people, all councils should plan and invest in the development of fully accessible, inclusive communities. Navigating shorelines and coastlines can be difficult or even impossible for many disabled people. It is important for the CCC as part of its coastal management plan to ensure that accessible places and spaces are created that can include disabled people.

# Climate change disproportionately impacts disabled people and older people.[[4]](#footnote-5)

# Nevertheless, disabled people are making an impact on how this is tackled

# through acting as agents of social change by identifying areas of importance to our communities.

# DPA has made submissions to other councils around the country on their coastline and coastal reserve management plans. In this submission, we make recommendations for accessibility improvements for Whakaraupō’s Lyttleton’s and Koukourarata’s Port Levy’s shorelines, especially in areas which will need to be changed to manage potential coastal erosion, inundation and flooding events.

Koukourarata Port Levy and Lyttleton Whakaraupō have the additional challenge of needing to plan for seismic risk, something that became evident in the Canterbury earthquakes of 2010-11 which significantly impacted on many coastal parts of Lyttleton and Port Levy. This earthquake saw accessibility to parts of Lyttleton and its shorelines impacted for months.

# DPA recommends that the CCC make the principles of inclusion, access and co-design a high priority in the coastal reserves management plan for Lyttleton and Port Levy. This means that all changes to buildings, facilities and assets are considered with an accessibility lens in mind.

Our submission will make some general and specific points about the need for accessibility and inclusion to be incorporated into planning for the management of Lyttleton’s and Port Levy’s changing coastline.

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| **Recommendation 1:** that the CCC make the principles of inclusion, access and co-design with disabled people a high priority in the refreshed coastal reserves management plan. |

DPA acknowledges the objectives determined by the communities of Lyttleton and Port Levy which form the basis of this plan:

* Community and resilience
* Community and culture
* Infrastructure
* Access to natural areas
* Environment and landscapes

**The bigger picture – managing changes to assets and facilities in an inclusive and accessible way**

If any assets and facilities, such as public toilets, public buildings and other facilities are moved as part of work to shift them away from vulnerable areas that the opportunity is taken for them to have accessibility improvements made and/or new facilities constructed according to universal design standards.[[5]](#footnote-6)

Universal design standards are about making buildings and facilities accessible to everyone, including disabled people, across the course of their lifespan.

Also, if any areas are being reclaimed and turned into wetland and riverbank/streambank-based parks or new beach tracks that these areas are designed to ensure accessibility.

Key accessibility features along any new or rejuvenated riverbank/streambank parks or beach tracks should include signage, accessible toilets, height adjustable seating and user-friendly picnic tables, and tactile strips to enable safe navigation for blind and low vision people.

We recognise that some existing walking tracks, including for example that from Governors Bay to Allandale, will be only kept open while it is safe to do so due to growing storm damage.

When it comes to toilets, we note the proposals made to move or change public toilets at Allandale, Purau and Koukourarata. If changes are made to these toileting areas, then the need for change/relocation presents an ideal opportunity to create toilets (even temporary ones) built to universal design specifications.

Another aspect of toilet accessibility is the ease with which people can get to them. Some of our Christchurch members have visited coastal toilets where access is either on gravel or sand pathways/tracks which are often not easily navigable for wheelchair or mobility aid users.

DPA recommends that buildings and facilities are audited for accessibility in terms of assessing for internal and external barriers.

From our perspective, it is important to keep communities involved in all decisions, and this includes disabled people, about the need to close or change infrastructure like walking tracks, halls and other facilities as climate change impacts continue.

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| **Recommendation 2:** that all new facilities in and around the coastal shoreline, including public toilets, be upgraded and/or built to Universal Design standards. |

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| **Recommendation 3:** that buildings and facilities are audited for accessibility in terms of assessing for internal and external barriers. |

Any changes to coastlines should incorporate entry and exit points to places such as beaches and parks which can be accessed by everyone including disabled people.

This can be done, for example, through the placement of sufficient mobility parking spaces, drop off points for mobility vans and service vehicles, the placement of tactile strips on and around key areas for blind and low vision people, the creation of landing points where people can rest (especially if the entry or exit is steeply sloped) and the creation of suitable footpaths and walkways down into beach and coastal areas.

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| **Recommendation 4:** that accessible entry and exit points be created throughout the coastal area by, for example, the creation of sufficient mobility parking spaces and footpaths/walkways into beaches and coastal areas. |

**Managing managed retreat**

As climate change is now a significant threat and with disabled people being one of the most significantly impacted groups, there may be a need for building or other activity to be banned in specific areas and the possibility of managed retreat needs to be factored in.

DPA recommends if either managed retreat and/or building bans are proposed along any part of the area covered by this plan, that engagement around this specifically prioritise disabled people as one of the key population groups to be consulted with.

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| **Recommendation 5:** that disabled people be identified as a key population group for consultation on any managed retreat and building bans associated with climate change. |

**Civil defence and emergency responsiveness**

As part of the civil defence and emergency management planning process for the Lyttleton coastal area, the needs of disabled people must be prioritised.

This means that any civil defence and emergency management plans must involve disabled people as a key co-design stakeholder group.

DPA is pleased to see that the CCC will prioritise road maintenance and other temporary works to ensure that access is maintained to any coastal community following an emergency event.

This is an important consideration for everyone, especially disabled and older people who may need to evacuate or have supplies urgently delivered to them in the aftermath of an emergency.

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| **Recommendation 6:** that disabled people be identified as a key stakeholder group for emergency planning and civil defence purposes across all of Christchurch’s coastline area. |

**Disabled people as decision making partners**

Overall, the best way to develop an effective coastal reserve management plan is through engaging with key stakeholders, including disabled people and disability organisations, as it is implemented.

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| **Recommendation 7:** that both local disabled people and disabled people's organisations be involved in ongoing planning for the future of the Lyttleton and Port Levy coastlines. |

1. Mental Health Foundation UK. (2021) *How connecting with nature benefits our mental health*. <https://www.mentalhealth.org.uk/sites/default/files/2022-06/MHAW21-Nature-research-report.pdf> [↑](#footnote-ref-2)
2. Mental Health Foundation NZ. (2018). *Survey shows strong link between time spent in nature and positive mental health*. (<https://mentalhealth.org.nz/news/post/survey-shows-strong-link-between-time-spent-in-nature-and-positive-mental-health> [↑](#footnote-ref-3)
3. Jones, B., King, P. T., Baker, G., Nikora, L. W., Hickey, H., Perry, M., Ingham, T. R. (2024). Karanga rua, karanga maha: Māori with lived experience of disability self-determining their own identities. *Kōtuitui: New Zealand Journal of Social Sciences Online*, *19*(1), 45–64. <https://doi.org/10.1080/1177083X.2023.2224422> [↑](#footnote-ref-4)
4. Stein, J.S., Stein, M., Groce, N. & Kett, M. (2023). The role of the scientific community in strengthening disability-inclusive climate resilience. *Nature Climate Change 13*, 108-109. <https://www.nature.com/articles/s41558-022-01564-6.epdf?sharing_token=WG7FDIwxm9EdrpxLpip75tRgN0jAjWel9jnR3ZoTv0OlD0JgJ93tTQjFULmdry3BVlmuGxD5onmsJt996nkMEGAr2tCBsveYWZXhgtd709bHCKwbcstWptPivtOz4U34R-phYAWEgIDvEDGs0fzjPHcHM0ng8l0DWIje7vQzL10%3D> [↑](#footnote-ref-5)
5. <https://www.branz.co.nz/universal-design/> [↑](#footnote-ref-6)