

April 2024

**To Christchurch City Council**

Please find attached DPA’s submission on Christchurch City Council Long Term Plan 2024 - 34

For any further inquiries, please contact:

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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 feedback on the Christchurch City Council’s Long-Term Plan 2024 – 2034.

DPA believes that investment in council services and infrastructure needs to be maintained, even increased to to build resilience of both community and infrastructure.

One of the central concerns of disabled people locally lies around accessibility, mainly to the physical and built environment (especially in areas controlled by Council), as well as council information, communications and services.

DPA notes that this plan looks out 10 years and during that time, economic, social and environmental factors will change the city immensely due to the impacts of the climate crisis, population growth and an ageing population.

Disabled people are a key population group as we constitute a significant share of Canterbury’s population as in the 2013 New Zealand Disability Survey (the latest statistics available), an estimated 25% of Cantabrians self-identified as living with impairments. If these statistics are overlain with the most recent population estimates for Christchurch (n=408,000) and assuming that the city’s total percentage of disabled people is like the regional disabled population, then around 102,000 disabled people are living in the city as of 2024.

DPA, alongside other disability and community groups, have been involved in the preliminary discussions around this LTP. We were very pleased to be included and found the conversations to be constructive. We feel that this is overall a good LTP but there are some areas in need of improvement. We make recommendations to ensure the needs of the city’s disabled population are fully considered as part of future city budgets.

The primary issue that was identified by the disabled people who participated in these discussions was the need to prioritise footpath maintenance so that they are accessible and safe for disabled people.

DPA is pleased to see that $58 million has been allocated to footpath and cycleway renewals and that a further $20 million has been allocated to the creation of new footpaths in the next LTP, representing a proposed total spend on footpath and cycleway infrastructure of $78 million.

Improved footpath maintenance ensures that disabled people can not only participate in their communities but enjoy a better quality of life. Community participation also helps keep health care costs under control for both government and individuals, as disabled and non-disabled people have a greater ability to engage in recreational, sporting, leisure and community activities leading to better health and wellbeing outcomes for everyone.

DPA is pleased to have partnered with the Christchurch City Council over several projects during the last LTP period including:

* South Library and Service Centre refurbishment;
* Pioneer Stadium upgrade;
* Numerous consultations on footpath, cycleway and roading projects;
* Continuing membership by our Kaituitui (Community Connector) on the Council’s Accessibility Advisory Group.

In this submission, we provide feedback on the following subjects which are important to the Christchurch disabled community from the ‘What matters to our residents’ section:

* Transport (including footpaths and cycleways)
* Three waters
* Parks and foreshore
* Heritage
* Recreation and Sport
* Libraries
* Climate change

## Transport

DPA notes the statement at the beginning of the transport section of the consultation document that much of the proposed new spend in this area will depend on the new government’s transport funding priorities.

DPA recommends that the CCC (in partnership with ECan) makes the utmost effort to invest in environmentally friendly, accessible public transport infrastructure and systems. We strongly support the proposed spend of $78 million on new cycleway and footpath developments over the next ten years.

Our recommendation is that most of this spend be devoted to the maintenance of existing footpaths and the creation of new paths and cycleways in areas where there is population growth.

Footpaths must be built according to universal design standards and the New Zealand Transport Agency – Waka Kotahi’s ‘Pedestrian Network Design Guide.’[[1]](#footnote-2)

Building accessible walking and cycling infrastructure to these standards means that Council will save money from the outset in terms of maintenance costs (especially during the lifespan of the LTP) and ensure that injury rates remain negligible to non-existent on the city’s footpaths and cycleways.

To ensure that injury rates remain low, we would like to re-emphasise the need for cycleways and footpaths/walking tracks to be built separately but parallel to each other so that collisions are avoided between pedestrians and cyclists, something that is a major concern to disabled and older people.

DPA welcomes the proposed $101 million spend on transport infrastructure improvements including new bus lanes, intersection changes and renewals.

DPA recommends that new bus infrastructure – especially bus stops – be built to universal design and best practice accessibility standards to ensure that they are fully accessible to everyone, including disabled people.

Ultimately, DPA believes that by collaborating with Environment Canterbury in improving public transport provision, the CCC will make what contribution it can to reducing carbon emissions at a time when the policies of the new government will make the achievement of that target more difficult.

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| **Recommendation 1:** that new public transport infrastructure – especially bus stops – be built to universal design and best practice accessibility standards to ensure that they are fully accessible to everyone, including disabled people. |
| **Recommendation 2:** that the CCC (in partnership with ECan) makes the utmost effort to invest in environmentally friendly, accessible public transport options. |
| **Recommendation 3:** that Council proactively engage with the disabled community over all public transport upgrades as part of a co-design process. |

## Three Waters

DPA acknowledges the opportunities and challenges presented by the need to address the city’s Three Waters infrastructure which represents $2.66 billion (23%) of proposed operational spending and $2.75 billion (42%) of proposed capital spending.

We recognise that the political debate over this issue (that has extended across both the previous government and into the new government’s term) has complicated matters for councils all around Aotearoa, including in Christchurch.

The new Coalition Government’s decision to establish ‘Local Water Done Well’ as its main policy in this space mean that local councils will carry more of the responsibility and cost of maintaining and upgrading ageing water infrastructure.

Disabled people, alongside everyone else, depend on water for everyday functioning and for some people in the disabled community, this can extend to the need to use higher than average amounts of water than would be consumed in households with non-disabled people.

DPA is aware that last year (as reported in local media) the mother of a disabled child complained to Council following her household being incorrectly charged an excess water rate despite having a medical exemption due to her son being incontinent and needing to be changed and showered constantly.[[2]](#footnote-3)

DPA is concerned that given the need for Councils (including Christchurch) to spend more on water infrastructure that greater cost recovery through excess water charging will be one of the ways in which this is undertaken.

DPA is concerned that excess water charging by councils for domestic users will unfairly penalise low-income households which include a disproportionately high number of disabled people and households that have high water usage due to the health or disability of a member of the household.

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| **Recommendation 4:** that great care is taken to ensure that excess water charges do not unfairly impact disabled people and low-income households and that medical exemptions continue to be applied for households with disabled people and people with health conditions. |

## Parks and foreshore

Disabled people enjoy the opportunity to get out and about within the city’s parks and foreshores and greatly value having these places and spaces made more accessible and inclusive so that we, alongside non-disabled people, can enjoy them on an equitable basis.

DPA supports the spending proposals outlined in the LTP covering park upgrades including to the Ōtakaro Avon River Corridor, Te Nukutai o Tapoa – Naval Point development, Akaroa Wharf and Takapūneke Reserve.

DPA also supports funding for the parks rolling renewal programme covering playgrounds, pathways, and green assets. We have submitted on many of the above projects calling for them to be built to accessible, universal design standards.

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| **Recommendation 5:** that all new park and foreshore facilities be built to universal design and best practice accessibility standards to ensure that they are fully accessible to everyone, including disabled people. |
| **Recommendation 6:** that Council proactively engage with the disabled community over all park and foreshore facility upgrades as part of a co-design process. |

## Heritage

DPA supports the proposed $51 million budget for heritage item upgrades. Our main ask is that each of the proposed upgrades to the Canterbury Provincial Chambers, Botanic Gardens and Robert McDougall Gallery are made fully accessible.

DPA notes the restrictions which apply to making heritage buildings accessible for everyone, including disabled people, under legislation. We would like to see these provisions changed once accessibility legislation is passed so that un-necessary restrictions/barriers are removed so that disabled people are able to access and enjoy heritage spaces and places along with everyone else.

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| **Recommendation 7:** that Council proactively engage with the disabled community over each of the proposed heritage facility upgrades as part of a co-design process. |

## Recreation and Sport

Disabled people have an equitable right alongside non-disabled people to participate in the recreational and sporting life of the city.

DPA successfully engaged with Council on several recreational facility projects, most notably the Hornby Centre and Pioneer Stadium developments. These consultations were positive and constructive from our perspective.

Our submission on the Hornby Centre upgrade was warmly received by the CCC and relevant community board with almost all the recommendations around accessibility being accepted.

DPA supports the proposed capital budget of $153 million for recreational and sporting facility upgrades.

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| **Recommendation 8:** that all new recreational and sporting facilities be built to universal design and best practice accessibility standards to ensure that they are fully accessible to everyone, including disabled people. |
| **Recommendation 9:** that Council proactively engage with the disabled community over each of the proposed recreational and sporting facility upgrades as part of a co-design process. |

## Libraries

DPA agrees with the statement in the consultation document that libraries are more than just books in that they ‘provide people with the resources and spaces to connect, learn and participate. By ensuring free and equitable access for all, our libraries enable people to strengthen their communities – culturally, socially and economically.’

For disabled people this is doubly so given that many in our community live on low incomes, experience barriers to accessing communication and information, and are often socially isolated.

DPA has been extensively involved in planning around the rebuild of the earthquake-damaged South Library and Service Centre building, another project on which we submitted and saw many of our recommendations accepted by the community board. Subsequently, DPA was invited to provide further feedback on the design of the new library and service centre.

DPA is pleased to see that the South Library and Service Centre Ōmōkihi rebuild has been allocated $29 million in this LTP.

DPA notes that the balance of the spend in the libraries space will include expanding and renewing the city’s extensive library collection and continuing to invest in technology solutions.

We welcome these proposals with the additional recommendation that library collections and technologies include works which are fully available in accessible formats and technologies that can be used by disabled people.

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| **Recommendation 10:** that library collections and technologies include works which are fully available in accessible formats and technologies which can be used by disabled people. |

## Climate Change

As we have pointed out in past submissions to this Council and others around Aotearoa, disabled people will be - and already are - one of the most at risk groups from climate change impacts.

For this reason, climate change, the need to mitigate it and ensure that there are effective responses which incorporate disabled people at all levels is one of DPA’s top priorities.

A recent article published by the journal ‘Nature Climate Change’[[3]](#footnote-4)highlighted that governments werefailing to take disability inclusive climate action and disabled people are disproportionately more at risk of higher mortality rates in climate emergencies.

This is underpinned by the fact that disabled people have been accorded lower priority in climate emergencies or other disasters and systemically excluded from receiving emergency healthcare and humanitarian support as a result.

The article also highlighted that slow onset climate change, including sea level rise, more damaging weather events, as well as rising water and food scarcity will all exacerbate the existing inequities experienced by disabled people.

Michael Stein, in a Harvard University Center for the Environment (2023)[[4]](#footnote-5) interview elaborated about the impact of climate change on disabled people:

*“*Climate change amplifies the marginalization experienced by persons with disabilities negatively affecting health, reducing access to healthcare services, food, water, and accessible infrastructure. People with psychosocial disabilities have triple the rate of mortality in heatwaves.*”*

DPA is pleased to see that $318 million has been earmarked for spending on projects which directly impact climate change mitigation.We are also appreciative of the proposal to spend a further $1 billion on projects that will help the city adapt and build resilience to climate related events in the form of flood protection work on the Ōtākaro Avon River Corridor.

An example of why disabled people benefit from protection works such as the creation of flood banks is the desire to avoid homelessness. Disabled people, especially those who live with mobility and other impairments, face a great shortage of accessible housing which is difficult to access even at the best of times, let alone after a natural disaster.

Following last year’s North Island storms, there were stories about disabled people who could not return to their homes for many months afterwards, and some disabled people (as we heard earlier this year) are still living in inaccessible housing over a year later.

DPA has been inspired by the model provided by the Bristol Disabled People’s Forum in the UK where the local council in that city has engaged (and continues to engage in) climate change planning and dialogue with their local disabled community through the forum. The city council co-developed a plan with the Disability Equality Forum (a Bristol-based disabled people’s organisation which is cross-impairment based like DPA) around climate change and its impact on disabled people.

DPA views the use of deliberative, decision-making structures like the Bristol Disabled People’s Forum as one means through which Christchurch’s disabled community could dialogue with both the CCC and ECan on the development of disability responsive climate change plans.

We recommended to ECan in our submission to their LTP that it takes the opportunity to forge a closer relationship with the disabled community around climate change and we now invite the CCC to do the same (jointly with ECan and other local councils), especially when it comes to planning a climate response which fully incorporates our issues, needs and aspirations.

DPA recommends that ECan and the CCC dialogue with the Christchurch disabled community (led by Disabled People’s Organisations like DPA) over ways in which a closer partnership can be forged and where the issues that concern us in the environmental and climate change spaces can be aired.

The goal should be the development of disability responsive climate change and environmental plans for the Canterbury region through the CCC, ECan and other local councils.

DPA also recommends that emergency responsiveness plans for the Christchurch City area accommodate the needs of disabled people, especially in relation to both seismic and climate related emergencies. This should be undertaken in a co-design partnership between local disabled people and emergency management bodies.

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| **Recommendation 11:** that the CCC, ECan and the Christchurch disabled community (including DPA) dialogue over ways in which a closer partnership can be forged around climate resilience and emergency responsiveness. |
| **Recommendation 12:** that emergency responsiveness plans for the Christchurch City area accommodate the needs of disabled people, especially in relation to both seismic and climate related emergencies and are developed as part of a co-design partnership between disabled people and emergency management bodies. |

1. <https://www.nzta.govt.nz/walking-cycling-and-public-transport/public-transport/public-transport-design-guidance/bus-stop/> [↑](#footnote-ref-2)
2. <https://www.stuff.co.nz/the-press/news/131412207/mum-sent-excess-water-charge-bill-despite-exemption-over-sons-disability> [↑](#footnote-ref-3)
3. 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?](https://www.nature.com/articles/s41558-022-01564-6.epdf?sharing_token=WG7FDIwxm9EdrpxLpip75tRgN0jAjWel9jnR3ZoTv0OlD0JgJ93tTQjFULmdry3BVlmuGxD5onmsJt996nkMEGAr2tCBsveYWZXhgtd709bHCKwbcstWptPivtOz4U34R-phYAWEgIDvEDGs0fzjPHcHM0ng8l0DWIje7vQzL10%3D) [↑](#footnote-ref-4)
4. Harvard University Center for the Environment. (2023, January 19). *Disability in a Time of Climate Disaster*. Retrieved from [https://environment.harvard.edu/news/disability-time-climate-disaster#](https://environment.harvard.edu/news/disability-time-climate-disaster#:~:text=Climate%20change%20amplifies%20the%20marginalization,rate%20of%20mortality%20in%20heatwaves) [↑](#footnote-ref-5)