

July 2023

To Greater Christchurch Partnership

Please find attached DPA’s submission on the Greater Christchurch Draft Spatial Plan

For any further inquiries, please contact:

Chris Ford

Kaituhotuho Kaupapa Here ā Rohe - Regional Policy Advisor (Local Government)

[policy@dpa.org.nz](mailto:policy@dpa.org.nz)

# 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:**

* **Leadership:** reflecting the collective voice of disabled people, locally, nationally and internationally.
* **Information and advice:** informing and advising on policies impacting on the lives of disabled people.
* **Advocacy:** supporting disabled people to have a voice, including a collective voice, in society.
* **Monitoring:** monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

## UN Convention on the Rights of Persons with Disabilities

DPA was influential in creating the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD),1 a foundational document for disabled people which New Zealand has signed and ratified, confirming that disabled people must have the same human rights as everyone else. All state bodies in New Zealand, including local and regional government, have a responsibility to uphold the principles and articles of this convention. There are a number of UNCRPD articles particularly relevant to this submission, including:

### Article 3 – General principles

### Article 9 – Accessibility

### Article 19 – Living independently and being included in the community

### Article 20 – Personal mobility

## New Zealand Disability Strategy 2016-2026

Since ratifying the UNCRPD, the New Zealand Government has established a Disability Strategy2 to guide the work of government agencies on disability issues. The vision is that New Zealand be a non-disabling society, where disabled people have equal opportunity to achieve their goals and aspirations, and that all of New Zealand works together to make this happen. It identifies eight outcome areas contributing to achieving this vision. There are a number of Strategy outcomes particularly relevant to this submission, including:

### Outcome 5 – Accessibility

# The Submission

DPA welcomes this opportunity to engage on the Draft Spatial Plan being proposed by the Greater Christchurch Partnership collaboration.

DPA sees this spatial plan as presenting an opportunity to plan for the growth of Ōtautahi/Christchurch which is facing huge challenges due to being the largest city in the South Island and with significant population growth projected to continue.

For disabled people, accessibility is not just seen as an add on but an essential and central component of planning for Christchurch’s growth over the next 30 years.

According to the 2013 Statistics New Zealand Disability Survey one in four New Zealanders have a disability or long-term health condition. Māori and Pacific peoples have an even higher-than-average rate of disability.[[1]](#footnote-2)

The number of disabled people in Christchurch’s population is projected to increase over the next few years due to the high incidence of ageing within the population, amongst other factors.

Given the 2013 Disability Survey’s figures and factoring in the draft plan’s projections of a 700,000 – 1 million population for Greater Christchurch by 2051, this could mean that there could be anywhere between 140,000 and 200,000 disabled people living within the region by that time.

DPA believes that bearing those statistics in mind, building an inclusive Christchurch where everyone, including disabled people can fully participate in their communities without barriers should be the overriding objective of the CCC in terms of this plan.

Our submission and recommendations will cover the following key opportunities contained within the proposed Spatial Plan:

* Opportunity 2: Reducing hazards and risks so that people and communities are resilient to the impact of natural hazards and climate change.
* Opportunity 3: Protecting, restoring and enhancing the natural environment with focus on te ao Māori, enhancement of biodiversity, the connectivity between natural areas and access for people.
* Opportunity 4: Enabling diverse and affordable housing that support thriving neighbourhoods that provide for people’s day-to-day needs.
* Opportunity 6: Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.

DPA members in Christchurch contributed their views to this submission.

Below we provide some background around the main challenges facing disabled people in terms of housing, transport, climate change and infrastructure.

## Background

### Housing

The housing situation for disabled people is currently still dire in Christchurch as it is around the country.

For this reason, disabled people are one group who are disproportionately impacted by homelessness and poor housing. This is due to disabled people being overrepresented amongst low-income earners while also facing higher living costs due to disability. For this reason, disabled people are more likely to be renters; 2018 data from Statistics New Zealand shows that 47% of disabled people rent compared to 35% of non-disabled people.[[2]](#footnote-3)

Disabled people are also at greater risk of homelessness due to the lack of security around ongoing tenancy and this is exacerbated by the low number of accessible houses not only in Christchurch but throughout the country.

However, as this Spatial Plan looks out thirty years, we have an expectation that during this period, central government will (at some point) be persuaded to legislate for housing design standards to focus on universal design, meaning that disabled people as well as everyone else will be able to live in homes that are both accessible and usable across their natural lifespans.

As we elaborate in the body of our submission, the main challenge to housing accessibility arises from orienting spatial planning away from planning for urban sprawl towards the creation of more compact communities instead.

### Transport

Provision needs to be made as part of the spatial plan to accommodate the transport needs of all disabled people and this includes for those who transport themselves via different modes including driving, bussing, walking, cycling, taxis and trains.

In 2022, Waka Kotahi published independently commissioned research (in which DPA collaborated) entitled ‘Transport experiences of disabled people in Aotearoa New Zealand’. [[3]](#footnote-4)

This research illustrated the ongoing accessibility challenges faced by disabled people when using public transport. Disabled people’s main challenges included, for example, issues around using Total Mobility (TM), the inaccessibility of bus services, lack of footpaths and safe crossing points, and feeling excluded from the planning of sustainable city centres, as well as the disablist attitudes of some transport planners.[[4]](#footnote-5)

Disabled people also have ongoing issues with accessing buses and mobility taxis in Christchurch (as well as throughout the country) which raises the need for improved transport accessibility and affordability[[5]](#footnote-6), including for disabled people, as being key to the success of all urban planning efforts going forward.

### Climate change

The disabled community are already being severely hit by the impacts of climate change and are expected to be one of the hardest hit population groups going forward, locally, nationally and internationally.[[6]](#footnote-7)

DPA welcomes the focus on avoiding hazards, especially those which are climate related, as part of this plan. Due to the Canterbury earthquakes a decade ago, much of the city has already been assessed for natural and geological hazards and this has made Greater Christchurch one of the first areas in New Zealand to undergo this process.

The combined impacts of climate change and sea level rise could mean that mitigation measures and/or managed retreat is a possibility in coastal areas of Greater Christchurch including in eastern parts of the city like New Brighton and in areas where there is an increased flooding risk.

The fact that certain areas will be deemed unsuitable for house building and settlement activity or even face managed retreat means that disabled people (especially those living in these areas) need to be fully involved in discussions about this issue.

However, compared with other centres, Christchurch has the advantage of being an almost entirely flat city, which is of considerable value to many disabled people, especially people with mobility impairments who use wheelchairs and other mobility devices.

This means that re-settlement issues may present comparatively less of a challenge in Christchurch than in other centres, but housing affordability is still a central concern for disabled people.

### Infrastructure

DPA believes that accessible community infrastructure needs to be put in place across the board.

For disabled people, this includes infrastructure such as footpaths, roads, parks, rail, bus and ferry services, all of which will support both existing and new communities across Greater Christchurch.

We talk further in this submission about the need to have all infrastructure designed and built to universal design standards.

### The Draft Greater Christchurch Spatial Plan and Disabled People: Challenges and Opportunities

#### Opportunity 2: Reducing hazards and risks so that people and communities are resilient to the impact of natural hazards and climate change.

DPA acknowledges the need to manage development around the threats posed by climate change and significant natural hazards including (in Christchurch’s case) earthquake faults.

DPA supports the proposition that known areas which present a natural hazard risk due to natural and climatic risks should be re-assessed to see whether future development is viable.

DPA is also supportive of the idea that where development has already been approved (or undertaken) in potentially vulnerable, high-risk areas that reviews are undertaken into appropriate actions to mitigate the risks that present from this.

We are concerned that if accessible housing is (or has been) constructed in high-risk areas, especially those prone to flooding or sea level rise, there is the potential for any units to be severely damaged or destroyed, rendering them uninhabitable, perhaps only a short time after first being moved into by disabled people; after having undergone (in many cases) a long wait for them, putting lives and wellbeing of disabled people at risk.

DPA would like to see these stressful scenarios for disabled people avoided through good, effective involvement in all aspects of development planning by local councils in the Greater Christchurch area under this strategy.

DPA believes that it is not wise or appropriate for land which is deemed to be at high risk from natural hazards including flooding and sea level rise, to have new buildings or development on them without full consideration about how the risks to disabled people living or working in these buildings can be managed or mitigated.

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| **Recommendation 1:** that the Greater Christchurch Partnership’s council stakeholders review the appropriateness of allowing new house and commercial building activity in areas deemed at high risk of flooding or sea level rise. |

There is also the potential (as noted earlier) for some areas - including those highly populated by disabled people - to be impacted by managed retreat in parts of Christchurch. In these circumstances, many disabled and older people will need to be transitioned away from living in otherwise suitable communities to (hopefully) less risky but still accessible ones.

In the medium to long-term, this will require Greater Christchurch Partnership Stakeholders and central government to partner with disabled people and disability organisations as part of community co-design efforts to successfully plan these types of transitions.

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| **Recommendation 2:** that Greater Christchurch Partnership stakeholders partner with disabled people, tangata whaikaha/whānau hauā and disability organisations to plan any managed retreat from existing communities. |

#### Opportunity 3: Protecting, restoring and enhancing the natural environment with focus on te ao Māori, enhancement of biodiversity, the connectivity between natural areas and access for people.

DPA believes that access for all people to the natural environment is important.

Disabled people have the right to fully access our natural spaces and places in the same way as non-disabled people do.

DPA supports the concept of establishing an enhanced blue-green network which would see an integrated approach where people could enjoy traversing from green areas through to the coast via walkways and other means.

That is why supporting natural infrastructure including walking tracks, parks and waterways need to have accessibility features incorporated into them.

An example of this would be building pedestrian-only walking tracks which can accommodate a wide range of users, including disabled people who mobilise using wheelchairs or other mobility devices and blind and low vision people by the placement of tactile strips in strategic locations.

DPA believes that infrastructure to support cycling and micro-mobility vehicle use should remain separate but parallel to pedestrian-only walking tracks to ensure the safety of both cyclists and pedestrians.

Access to natural areas should also be supported through the construction and/or upgrading of facilities to Universal Design (UD) standards including picnic grounds, camping grounds, accessible public toilets/changing areas, viewing platforms, bus stops, parks and sports fields to accommodate the widest range of users, including disabled people.

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| **Recommendation 3:** that access to Greater Christchurch’s present and future natural areas be supported through the construction and/or upgrading of facilities to Universal Design standards. |

#### Opportunity 4: Enabling diverse and affordable housing that support thriving neighbourhoods that provide for people’s day-to-day needs.

DPA welcomes the goal of enabling diverse and affordable housing that support thriving neighbourhoods that provide for people’s day-to-day needs.

DPA believes that the need for fully accessible housing be added as a goal alongside that of the desire for it to be diverse and affordable.

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| **Recommendation 4:** that enabling accessible housing be added to the opportunity four goal to read “Enabling diverse, **accessible** and affordable housing...” |

We noted earlier the estimate that there could be between 140,000 and 200,000 disabled people residing in the Greater Christchurch area by 2051.

This means that diverse housing designs which are fully accessible and built to at least Universal Design Lifemark Standard 5 should be consented throughout the Greater Christchurch area enabling disabled people the ability to have greater choice in terms of the housing options which are available to us as a community.

Post-earthquakes, there was the expectation that more housing and public buildings in a rebuilt Christchurch would be designed and built to UD accessibility standards and that disabled people would be able to access a wider choice of homes and buildings as a result.

Disappointingly, this has not been the case in that while an increasing number of new dwellings have been constructed, not all are fully accessible to disabled people and their families/whānau especially given the high proportion of two-storey housing developments which have been built since 2011.

However, the new Spatial Plan affords the disabled community another opportunity to call for Greater Christchurch to have more accessible housing built to meet both current and future projected demand, especially given our ageing population.

We also note the Spatial Plan’s call for more compact communities in some areas and the impact this will have on the housing designs which could be permitted in these areas in the form of multi-storey dwellings.

When it comes to potentially building more multi-storey housing, the Building Code and other associated legislation needs to be changed by Parliament to make the growing number of high-rise apartments and dwellings necessitated by this policy fully accessible.

This is since under the current Building Code, building owners/developers are not legally required to have accessibility features, including lifts, installed in private dwellings (i.e., houses and business premises) if they are less than three floors in height.8

In the absence of any changes to the Building Code for even part of the timeframe of this plan, Greater Christchurch councils will need to incentivise private, government and non-government organisations through capital contributions to build more housing and business premises to Lifemark UD standards. The use of capital contributions will also help offset any additional costs involved.

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| **Recommendation 5:** that Greater Christchurch councils incentivise the building of more compact, accessible to Lifemark UD standards houses and public buildings through capital contributions. |

All communities in Christchurch should be suitable for every disabled person to live in too, and this includes people with mobility impairments, blind and low vision people, neurodiverse people (i.e., Autistic people), people with psychosocial disabilities/mental distress and Deaf/deaf communities.

Some of Greater Christchurch’s growing communities, including Selwyn, Rolleston, Papanui, Rangiora and Eastern Christchurch could become real leaders in developing accessible communities where disabled people feel fully included through the ability to participate freely without barriers.

This can be achieved through having NZ Sign Language, Braille, Large Print, Easy Read/Plain English and Māori signage in public spaces/places, mobility crossings with kerb cut outs, quiet spaces where people can retreat to in busy areas (which are suitable for neurodivergent people and people experiencing mental distress), accessible bus stops, mobility parking and vehicle drop off areas, appropriate seating where people can sit and rest as well as good lighting and security features.

Building infrastructure to UD standards should support the building of accessible, inclusive communities but more detail needs to be included in the final plan as to how.

We believe that the best way to do this is to ensure that Universal Design Standards (to at least Level 5) are written into the final spatial plan so that they are understood by developers, planners and architects.

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| **Recommendation 6:** that the final Spatial Plan fully incorporate Universal Design Standards (at least to level 5) to ensure accessibility. |

DPA believes in the need for councils to conduct extensive barrier free accessibility audits to determine what changes are needed as well.

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| **Recommendation 7:** that Greater Christchurch councils undertake barrier free audits to determine what changes are needed in all communities. |

#### Opportunity 6: Prioritise sustainable transport choices to move people and goods in a way that significantly reduces greenhouse gas emissions and enables access to social, cultural and economic opportunities.

DPA supports the goal of prioritising sustainable transport choices within Greater Christchurch to support this country’s climate change goals.

DPA would like to see fully accessible transport added to the opportunity six goal alongside the need to promote sustainable transport choices.

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| **Recommendation 8:** that fully accessible transport is added to the opportunity six goal as follows “Prioritise sustainable and **accessible** transport choices....”. |

It is important that accessibility is built into all facets of the future public transport system in Christchurch, especially as it becomes more integrated, to ensure that the growing number of disabled people are accommodated and that our disabled community can exercise greater choice in terms of transport options.

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| **Recommendation 9:** that all public transport including buses, taxis, trains and ferries be fully accessible for everyone, including disabled people. |

DPA fully supports plans for carbon neutral Mass Rapid Transit (MRT) to become the key means of delivering transport to Greater Christchurch residents and visitors in the future. We also welcome plans to ensure that MRT provides links that run between suburban communities where people live and key employment areas.

The introduction of MRT will future proof Greater Christchurch’s public transport network and avoid some of the problems that have plagued Auckland in terms of their transport network in recent years.

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| **Recommendation 10:** that accessible, carbon neutral Mass Rapid Transit form the basis of Greater Christchurch’s future public transport network. |

DPA also welcomes proposals to enable safe, attractive and connected opportunities for walking, cycling and other micromobility. This should be undertaken on the proviso that we laid out earlier in this submission around the need for separate but parallel spaces for pedestrians and cyclists/micromobility users.

1. Statistics New Zealand. (2013). New Zealand Disability Survey. Retrieved from http://archive.stats.govt.nz/browse\_for\_stats/health/disabilities/DisabilitySurvey\_HOTP2013.aspx#gsc.tab=0 5 [↑](#footnote-ref-2)
2. Statistics New Zealand. (2018). The disability gap 2018. Retrieved from <https://www.stats.govt.nz/infographics/the-disability-gap-2018/#:~:text=Home%20life-,Of%20disabled%20New%20Zealanders%20aged%2015%E2%80%9364%20years%20in%202018,percent%20of%20non%2Ddisabled%20people>.

   [↑](#footnote-ref-3)
3. Doran, B., Crossland, K., Brown, P., & Stafford, L. (2022). Transport experiences of disabled people in Aotearoa New Zealand (Waka Kotahi NZ Transport Agency research report 690). Retrieved from <https://www.nzta.govt.nz/resources/research/reports/690> [↑](#footnote-ref-4)
4. Kelly-Costello, A. (2023, June 30). Putting a blind-friendly transport system on the agenda. Blind Citizens New Zealand. <https://abcnz.org.nz/uncategorized/putting-a-blind-friendly-transport-system-on-the-political-agenda/> [↑](#footnote-ref-5)
5. Hatton, E. (2023, May 2). Mobility fears as taxi industry warns of worker shortage. *Newsroom*. https://www.newsroom.co.nz/mobility-fears-as-taxi-industry-warns-of-worker-shortage [↑](#footnote-ref-6)
6. Schulte, C. (2020, March 28). People With Disabilities Needed in Fight Against Climate Change. Retrieved from <https://www.hrw.org/news/2020/05/28/people-disabilities-needed-fight-against-climate-change#:~:text=People%20with%20disabilities%20are%20at,said%20in%20a%20recent%20report>. [↑](#footnote-ref-7)