# **Disabled Persons Assembly Submission on the draft national adaptation plan.**

**Date:** 7 June, 2022.

**Forum:** Zoom meeting.

The intersection between disability and climate change is an area that we at DPA have been focussing on and it is a high priority for us. Disabled people are being impacted directly by climate change, but also by the changes that are being brought in to either mitigate or to adapt to climate change. If these changes not done with a disability lens, we became massively disadvantaged and impacted. There are a lot of examples of this already happening and we are very keen that the Ministry is really aware of this.

It wasn't very encouraging when the Climate Adaptation Plan was not accessible. It was very frustrating for us as a team and quite difficult to work around. While the plan was available as a word document much of the crucial information was in images which weren’t accessible to screen reader users. It's not enough for documents to be in Word , all images must be described. We hope that going forward as you release work on future consultations, that you will be aware of the need for that information to be accessible. This is important because if we can't have a say at the beginning then we're not going to be built into the plan in a way that works for us. While we were not able to do a written submission for issues, providing an oral submission, in some ways, has been more valuable.

We are very pleased that there is an adaptation plan, and we were pleased that you pulled out disabled people as a specific area to give some thought to. There are key areas that the plan has not gone far enough to give thought to for disabled people adapting to climate change.

# **The intersection between disability and climate change**

## **The impact of climate change on where people live**

This is a key issue that the national adaptation plan has not gone far enough to consider. Disabled people often choose where they live for a number of reasons. Where you just happen to be is one of them, and that is an issue for all of us, but when disabled people are buying houses or are moving into state housing, they often think about the typography, somewhere flat, somewhere near transport. We are aware that there's quite a number of disabled people who live in flood prone type areas. Moving people away from flood prone areas is a critically important intersection between climate change and disability. If you move somewhere higher up it's likely by its nature to be less flat. There is also a shortage of accessible housing which may create issues if people need to move. Even amongst Kainga Ora new builds, there is a real dearth of accessible housing. You have that but you've also then got, and we will expand on this further, the accessibility of infrastructure in new places. The impact for disabled people having to move, and where to move to, is a big one that we think some more thought needs to be given to.

Many disabled people have built a network of support people around them and it's not guaranteed if you do move that you will be able to have you will have to rebuild that support network quite often and that is difficult. Some of us have spent a long time trying to build support networks. For many disabled people that very local first line of support is important.

For example, in south Dunedin there's a large flat area where a lot of disabled people are living. This area is of course very much at risk both from flooding and from sea level rise. This is one real example of communities that we know about that are on the frontline.

Parking has always been an issue for disabled people but has become worse as places are removing parking spaces and loading zones to fit in bus lanes. This relates to transitioning to a low emission society -- we want more people on public transport to stop clogging up our bigger cities. However, the knock-on effect is that disabled people are finding they can't park near places they need to go, or they can't get dropped off and picked up at places they need to go and get picked up from. This also ties into the move away from needing to have carparks in apartment blocks. That's been raised before as an issue, and when local government picks it up, they say it’s a regulation that has come down from central government. This is an example of a high-level change that has on the ground impacts for disabled people. It means that certain people cannot move to apartment living, which may be part of the issues related to homes, buildings and places for climate adaptation. This is an example of the on the ground change and implementation that has a huge impact for disabled people and needs to be thought about. If the national adaptation plan is to be really meaningful and leads to the adaptation for everyone, then it does have to drill a bit deeper around that intersection between disability and climate change.

# **New infrastructure and transport modes need to be fully accessible for disabled people**

Disabled people are in many ways the most affected by climate change and aware of emissions. We absolutely support having electric buses, trains or electric cars, but electric vehicles (EVs) must be accessible. We are aware that sometimes in the rush to transition transportation, accessibility hasn’t always been thought of.

We don't have any legislation in this country on a minimum noise level for EVs. The absence of a minimum noise standard creates issues for visually impaired people who cannot hear them. We know that in the EU there is a minimum noise level for electric vehicles. But we haven't adopted any such standards here. MRCagney, the transport consultancy firm, were asked by Waka Kotahi to do a bit of work around electric buses and their minimum noise. Uncertain what more has happened in this space.

We also know that electric cars tend to be smaller, and therefore create issues for wheelchair users. In addition, tasks such as being able to plug EVs in and charge them may be difficult for some people if the infrastructure is built in such a way. For example, do all electric buses have wheelchair spaces? Has this been thought about?

If people are needing to move into places quickly or without places being fully formed, there are likely to be infrastructural type issues that pose barriers to some disabled people. And again, that needs to be given a bit more thought in the adaptation plan. We keep coming back to this intersection between climate change and disability, it is critical.

There are two key points that are important:

* Regulationshave not kept pace with the changes that are happening. This is a reoccurring issue that has a great impact on disabled people. It is really important that as we move forward with the Climate Adaptation Plan, we identify what regulations to be upgraded to ensure equity for disabled people.
* A specific fund for disabled people is required to support transition. This is a recommendation we've also raised with the Climate Commission and asked for their advice to cover. An example of the type of support this fund could cover is supporting disabled people who need EVs that are potentially more expensive and larger than a typical EV, which is small and will not fit a wheelchair. If disabled people are not supported to make this change, it's not going to happen, and they will stay with accessible petrol cars for a long time yet.

## **Data and information needs**

While there is a need for an evidence base on the intersectionality of disabled people and climate change, we also cannot wait for this data to act. Data needs tie into supporting a transition. Do we know how many accessible houses that would need to be built for communities that have to move? Do we know how many disabled people have adapted petrol cars that will need to change to electric? We know that electric cars don't have that sound, or buses don’t have as much sound. We need to think about how we can increase awareness of this issue.

We need a more transitional lens for disability across climate adaptation, and the entire adaptation plan needs to take a disability transitional lens. Key areas are homes, buildings and places, infrastructure and community. We need more data, and we need to ensure regulations meet the needs of disabled people to keep pace with the changes that are required.

# **A National Climate Change Disability Reference Group for adaptation**

Conversations have taken place with people in specific communities who are at risk, and often an issue that arises is that consultations like this one are not accessible to people. At a local Government level, they might have a community consultation forum, but these will hardly ever be accessible for disabled people. As a result, we often miss out on being part of that conversation at grassroots level or miss out on accessing information in formats that work for us. So there is a real need to think about how we can engage disabled people in the conversation right down to grass roots level.

Our last recommendation is around having a National Climate Change Disability Reference Group, or something similar, in order to provide input on how processes for consultation and engagement can effectively support accessibility. An example can be seen through the Earthquake Commission's National Reference Group. This been set up following the Royal Commission of Inquiry into the Christchurch Earthquake. One of the issues that they identified is there were many groups of people they were not engaging with properly. The Earthquake Commission's National Reference Group has been going for a year now and has Mojo Mathers representing disabled people through the DPA. This kind of mechanism ensures that there is a voice at the table. For climate change, it will be important to set up an instrument that disabled people can ensure their voices are heard and issues are thought about every step along the way.

A lot of the work the Earthquake Commission's National Reference Group addresses is around insurance. As insurance companies are looking to retreat from at risk areas for climate change, there will be a need to unpack the issues around insurance and loss of insurance. There are significant barriers for disabled people around interacting with insurance. The DPA is following this and going on to talk to the Earthquake Commission about extra care claims policies. There needs to be a policy around identifying groups of people who they need to take extra care with when supporting them through the claims process and so on. This kind of policy is what's going to be needed somewhere on the ground level for working with people who may have anything from physical disabilities, sensory, communication and mental health. All these issues are going to interact in ways that are quite complex, and so there will need to be extra care taken in holding these conversations and supporting them through the decision-making process or engagement process.

If we don’t involve disabled people in this way and have this kind of outreach to them, things will get forgotten about, missed and overlooked. When you ask people to engage with the Climate Adaptation Plan, you’re asking them to unpick their lives and think about what it will mean for how they live their lives. As disabled people, we don't often unpick that, as a lot of people don't. And yet, if this plan is to really be effective that's what's got to happen. And the only way that can really be done is if disabled people and disabled people's organisations are front and centre within climate adaptation decisions and processes. This will support disabled people to do that unpicking and to have a transitional lens. Without a mechanism like a reference group, climate change adaptation for disabled people cannot be done effectively.

For example, things that will need to be considered:

* is there space in a new place for a carer to stay, or are you just going to get a one bedroom because you are on your own?
* Is there space for equipment?
* Power supply for some people is huge. Electricity companies have some obligations around supply for some people, but is that enough? Some people are in life threatening situations if they do not have access to power.

A specific fund that supports disabled people to transition could be linked in with the work of the reference group.

In the UK there are examples of climate adaptation work that takes into account this intersection between climate change and disability. The city of Bristol has done some work in this area.

As disabled people we are often aware that cross-governmental plans like this one include changes in one area that has knock on effects to another. An example could be that there's no point in getting on the bus in the town centre if you can't get off at a suburb because there's no accessible curve cuts. There has to be a way of bringing a disability lens and individual portfolio changes together, to look at any changes from a holistic perspective and ensure there are no unintended consequences of changes in one area creating barriers in another. This will include actively working to counteract the issues that come with siloed work prepared by different groups. It is incredibly important to look at intersections, that's where having different lenses across different silos is so important.