April 2024

**To Environment Canterbury**

Please find attached DPA’s submission on Long Term Plan 2024 - 2034

**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/%24file/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

## Introduction – Need to work together for the environment

Disabled Persons Assembly (DPA) is pleased to provide feedback on Environment Canterbury’s (ECan's) Long-Term Plan (LTP) for 2024 – 2034.

DPA notes that the plan does not specifically mention disability throughout the consultation document with it only being referred to indirectly with respect to Total Mobility (TM). The needs of other demographic groups, aside from Māori and rangatahi/youth, are not traversed either.

However, we acknowledge the importance that ECan attaches to its Te Tiriti relationships and support this fully.

We also recognise and support the strong relationships that have been forged between ECan and Canterbury’s young people as one of the kaitiaki/guardians of our environment who will have to live with the decisions that this generation makes regarding the ecological future of the region.

DPA is pleased that ECan has built positive relationships with both local iwi and youth and recommends that this be replicated with other population groups including disabled people.

Disabled people are an important 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 were living with impairments,[[1]](https://auc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-GB&rs=en-US&wopisrc=https%3A%2F%2Fdpanz.sharepoint.com%2Fsites%2Fpolicy%2F_vti_bin%2Fwopi.ashx%2Ffiles%2Fa0991e362f61474393b0abaedb8a0124&wdorigin=OFFICECOM-WEB.MAIN.EDGEWORTH&wdprevioussessionsrc=HarmonyWeb&wdprevioussession=be813fd5-3724-48ed-a639-21e40f5d5a49&wdenableroaming=1&mscc=1&hid=32771FA1-A0E6-3000-3691-9FF1EE54D859.0&uih=sharepointcom&wdlcid=en-GB&jsapi=1&jsapiver=v2&corrid=76b7c764-cc8f-6d42-5da1-1e9be5272b8c&usid=76b7c764-cc8f-6d42-5da1-1e9be5272b8c&newsession=1&sftc=1&uihit=docaspx&muv=1&cac=1&sams=1&mtf=1&sfp=1&sdp=1&hch=1&hwfh=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fdpanz.sharepoint.com%22%2C%22pmshare%22%3Atrue%7D&ctp=LeastProtected&rct=Normal&wdhostclicktime=1713243575306&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush#_ftn1) only 1% above the estimated percentage of disabled people living in New Zealand. If these statistics are overlain with the most recent population estimates for Canterbury (n=666,300) then at least 166,575 disabled people are living in the region as of 2024.

[[1]](https://auc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en-GB&rs=en-US&wopisrc=https%3A%2F%2Fdpanz.sharepoint.com%2Fsites%2Fpolicy%2F_vti_bin%2Fwopi.ashx%2Ffiles%2Fa0991e362f61474393b0abaedb8a0124&wdorigin=OFFICECOM-WEB.MAIN.EDGEWORTH&wdprevioussessionsrc=HarmonyWeb&wdprevioussession=be813fd5-3724-48ed-a639-21e40f5d5a49&wdenableroaming=1&mscc=1&hid=32771FA1-A0E6-3000-3691-9FF1EE54D859.0&uih=sharepointcom&wdlcid=en-GB&jsapi=1&jsapiver=v2&corrid=76b7c764-cc8f-6d42-5da1-1e9be5272b8c&usid=76b7c764-cc8f-6d42-5da1-1e9be5272b8c&newsession=1&sftc=1&uihit=docaspx&muv=1&cac=1&sams=1&mtf=1&sfp=1&sdp=1&hch=1&hwfh=1&dchat=1&sc=%7B%22pmo%22%3A%22https%3A%2F%2Fdpanz.sharepoint.com%22%2C%22pmshare%22%3Atrue%7D&ctp=LeastProtected&rct=Normal&wdhostclicktime=1713243575306&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush#_ftnref1) Canterbury Wellbeing Index

Another significant factor to note is that the number of disabled people is set to increase as our population ages.

These increases in the disabled population of the region and country come at a time when both Aotearoa and the world face an increasing number of environmental and social challenges.

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*[[1]](#footnote-2) 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)[[2]](#footnote-3) 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.”*

For all the above reasons, we need disability-inclusive climate adaptation where ECan in terms of its councillors, executive team, officers and scientists collaborate with disabled people to develop disability-friendly adaptation and mitigation policies informed by research.

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 the 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 Canterbury’s disabled community could dialogue with Environment Canterbury on the development of disability responsive climate change plans.

We believe that this LTP provides ECan and the local disabled community with the opportunity to forge a closer relationship, especially when it comes to planning a climate response which fully incorporates our issues, needs and aspirations.

DPA recommends that ECan and the Canterbury disabled community (led by Disabled People’s Organisations like DPA) dialogue 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 ECan.

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| **Recommendation 1:** that ECan and the Canterbury disabled community (led by Disabled People’s Organisations like DPA) dialogue over ways in which a closer partnership can be forged. |

We now outline our views on the three main areas of ECan activity covered in the LTP:

* Environmental Protection and Regulation
* Community Preparedness and Response to Hazards
* Public Transport

**DPA supports ECan's highest spending plan options in all three activity areas, and we elaborate on our reasons for doing so within this submission**

## Environmental Regulation and Protection

DPA recognises the importance of ECan's environmental regulation and protection work. There is more need than ever for regional councils (including ECan) to step up and work with partners including iwi and local communities to safeguard the environment to the maximum extent possible.

Living in a properly regulated and protected environment benefits everyone, including disabled people who are at greater risk of, for example, being adversely affected by the impacts of air pollution and by climate change.

DPA supports Option 1, the highest spending option which (as the consultation document outlines) is like Option 2 but provides for increased implementation beginning in Year 1 of the LTP.

ECan's plans to step up the pace of environmental protection from the outset will be important if the effects of new government policies are to be offset.

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| **Recommendation 1:** that ECan opt for Option 1 to maximise spending on environmental regulation and protection. |

## Community Preparedness and Response to Hazards

DPA is aware of the fundamental role that Canterbury Emergency Management have played in recent years in responding to the high number of emergency events which have impacted on the region including numerous flood and weather events.

Given the increasing incidence of adverse weather with climate change and the risk of further earthquakes (including the forecast rupturing of the Southern Alpine Fault), the leading role of Emergency Management will be more important than ever going forward.

As outlined earlier, disabled people are at fundamentally higher risk of not having their needs met during an emergency. DPA notes that central government is in the process of drafting new emergency management legislation which will be informed by the lessons learned during Cyclone Gabrielle and the other North Island storms in 2023. It is expected that the legislation will trigger a new set of expectations for councils around planning and preparedness.

In 2022, DPA welcomed the Canterbury Emergency Management Group Plan and in our submission on it we made several recommendations to ensure that Canterbury’s emergency management system was made more responsive to disabled people.

However, DPA has not been aware of any initiatives on the part of Council to improve the disability responsiveness of the system since then.

An example of this is that Canterbury has a sizeable Deaf community whose needs are not being fully served by the current emergency management system through, for example, communication breakdowns occurring in emergencies.

To address these and other concerns, one of our principal recommendations was the appointment of a disabled person to represent the disabled community on the Canterbury Civil Defence Emergency Management Committee.

To the best of our knowledge, no disabled person has been appointed to this committee yet.

DPA would like to take the opportunity of this LTP to reiterate our call for the appointment of a disabled person to the management committee.

This would be important as the needs and views of the disabled community need to be inserted into all disaster response policy and planning.

Otherwise, DPA welcomes the proposals contained in the LTP around civil defence, emergency management and being prepared to meet the risks posed by natural hazards be they floods, tsunamis, earthquakes, or landslides.

We support all efforts by Council to analyse, monitor and manage natural hazard risks across the province, including through flood prevention work as is being planned for the Selwyn District.

Natural hazards prevention work is important for everyone, and this includes for disabled people.

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 supports Option 1, the highest spending option which (as the consultation document outlines) is like Option 2 but provides for increased investment in flood scheme maintenance, operational and capital projects to increase flood and river resilience, maintenance of regional parks and other scheme works.

DPA recommends that additional spending is allocated to civil defence and emergency management over the lifespan of the LTP in expectation of the increased number of climate change related and other emergencies.

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| **Recommendation 2:** that ECan opt for Option 1, the highest spending option which (as the consultation document outlines) is like Option 2 but provides for increased investment in flood scheme and hazard prevention works. |
| **Recommendation 3:** that additional spending is allocated to civil defence and emergency management over the lifespan of the LTP. |

## Public Transport

DPA has outlined in past ECan consultations, including the most recent one on the Regional Land Transport Plan (RLTP) the need for inclusive, accessible transport.

We would also like to point out to Council that 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 ableist attitudes of some transport planners.

There were two key recommendations made in that report.

The first concerned the need to take a ‘whole-of-journey approach’ when making decisions around future transport investments to improve access to transport for disabled people. As the report outlined, if both central and local government adopted these approaches, there could be a shift away from relying on making small interventions that address only specific aspects of some trips to taking a more comprehensive approach to journey planning.

The second is that by central and local government transport planners taking a more comprehensive approach, it would enable a transition to an ‘accessible journeys for all’ approach whereby our transport system would be required to provide accessible journeys for everyone, including disabled people.

DPA recommends that ECan take the opportunity presented by both the RLTP and this LTP to begin implementing the ‘whole of journey’ and ‘accessible journeys for all’ transport models within the Canterbury region.

DPA is pleased to see that ECan acknowledges the importance and role that Total Mobility and placing more accessible buses on the road play in ensuring that both disabled and non-disabled people can mobilise within their communities.

DPA notes that ECan sees the popularity and ongoing need for TM in supporting 14,000 disabled Cantabrians to access their communities.

We remind ECan of the recommendation we made in our RLTP submission as well about the need for Council to set aside additional funding (over and above the Waka Kotahi contribution) for the first two years of the RLTP to cover the full costs of all mobility passenger service van fit outs in the region.

We also see that ECan contributes funding towards community trusts who provide transport in areas outside the urban public transport network with 17 being supported in this way.

DPA recommends that ECan continue to place high priority on funding for both TM and community trusts as part of its planned transport budget.

Equally, DPA commends Council for continuing to provide bus and ferry services in Greater Christchurch and Timaru. However, as part of moving towards an ‘accessible journeys for all’ approach, priority should be accorded to making all buses and ferries inclusive and accessible to everyone, including disabled people.

For all these reasons, we recommend that ECan adopt Option 1 as being both the highest spending option and Council’s own preferred option.

DPA sees merit in the proposals to spend up to $201.8 million by the third year of the LTP on transport provision not only because it will enable service improvements but that it will aid in the council being able to meet its own environmental and transport goals, irrespective of what central government does.

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| **Recommendation 4:** that Council place high priority on funding for both TM and community trusts as part of its planned transport budget. |
| **Recommendation 5:** that ECan begin implementing the ‘whole of journey’ and ‘accessible journeys for all’ transport models within the Canterbury region. |
| **Recommendation 6:** that ECan set asideadditional funding (over and above the Waka Kotahi contribution) for the first two years of the RLTP to cover the full costs of all mobility passenger service van fit outs in the region. |
| **Recommendation 7:** that ECan adopt Option 1 as the preferred option for transport spending. |

1. 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-2)
2. 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-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)