

**From:** Customer Services  
**Sent:** Friday, 1 April 2022 3:17 pm  
**To:** Have your Say  
**Subject:** FW: Disabled Persons Assembly (DPA) Submission on Environment Canterbury Annual Plan 2022/23 Email-020400883  
**Attachments:** DPAEnvironmentCanterburyAnnualPlanSubmission202223.docx

Hi Team

We've received the attached submission on the Annual Plan.

Kind regards  
Samuel

----- Original Message -----

**From:**  
**Received:** Thu Mar 31 2022 17:19:19 GMT+1300 (New Zealand Daylight Time)  
**To:** ECINFO <ecinfo@ecan.govt.nz>;  
**Cc:**  
**Subject:** Disabled Persons Assembly (DPA) Submission on Environment Canterbury Annual Plan 2022/23

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Kia ora,

Please find DPA's submission on Environment Canterbury's Annual Plan 2022/23.

We also wish to appear before councillors at a submissions hearing.

Nga mihi,

**Chris Ford**  
**Regional Policy Advisor**  
**Disabled Persons Assembly (DPA) NZ Inc**  
**Kaituitui**  
**Disabled Persons Assembly (DPA) Dunedin and Districts**  
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**Disabled Persons Assembly NZ**

April 2022

To Environment Canterbury  
Please find attached DPA's submission on Draft Annual Plan 2022/23

**Disabled Persons Assembly NZ**

Contact:

**Chris Ford**  
**Regional Policy Advisor**  
**Disabled Persons Assembly NZ**  
**Phone:**  
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**Ingrid Robertson**  
**Regional Kaituitui - Christchurch**  
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# Introducing Disabled Persons Assembly NZ

The Disabled Persons Assembly NZ (DPA) is a pan-impairment disabled person's organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) can direct their own lives. DPA works to improve social indicators for disabled people and for disabled people be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

- telling our stories and identifying systemic barriers
- developing and advocating for solutions
- celebrating innovation and good practice

## The submission

DPA welcomes the opportunity to submit on the Environment Canterbury Draft Annual Plan 2022/23.

DPA is pleased to see the proposal for targeted fare free travel as part of the suite of plans to increase public transport patronage, especially in Christchurch. This proposal will have a hugely beneficial impact on us as disabled people who will be able to afford to travel more and be fully involved in our communities. We do recommend though that those free fares be extended to Total Mobility Card holders in other parts of Canterbury. Otherwise, we see the proposed fare structure as a positive move, both for transport disadvantaged communities and the environment. We also note that the new fare structures will be trialled for the next two years but are hopeful that the scheme will promote increased patronage across all public transport platforms and, thus, be continued if successful.

DPA is also pleased to see that Environment Canterbury is wanting to further fund initiatives in support of this country's climate change response. However, as will be seen in our recommendations, we do have concerns about how the proposed climate levy, if introduced, will be levied. If a levy is recommended, we believe that it should be as fair and progressive as possible in that the burden should fall more on heavy environmental polluters and less on ordinary household ratepayers, especially those on low incomes.

DPA's preference is that any Council-driven climate change initiatives should be funded from existing rates revenue with support from central government.

## **The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)**

The UNCRPD Articles most relevant to our submission are:

- Article 4.3 Involving disabled people and our organisations in decisions that affect us
- Article 9 Accessibility
- Article 19: Living independently and being included in the community
- Article 20: Personal mobility
- Article 30: Participation in cultural life, recreation, leisure, and sport

New Zealand Disability Strategy 2016-2026:

- Outcome 5 - Accessibility

## DPA's recommendations

**Recommendation 1:** DPA strongly recommends that Council adopt the targeted fare-free option (option one). This will have a hugely beneficial impact upon disabled people who are low-income earners and, under existing fare structures, have a limited ability to afford public transport. We also welcome that the proposal covers both bus and taxi-based transport platforms through the inclusion of Total Mobility (TM) scheme users, thereby ensuring equity of coverage.

**Recommendation 2:** DPA notes that the targeted fare-free option is proposed only for the Greater Christchurch area. Therefore, we recommend that it be extended to other locations throughout Canterbury including, for example, Timaru, Rangiora, and Ashburton, especially with respect to Total Mobility.

**Recommendation 3:** DPA recommends that Council work on developing climate programmes and initiatives aimed at the disability community to help raise awareness of and prepare for the impacts of climate change and receive input into some of the ways that they can be mitigated at regional level.

**Recommendation 4:** DPA recommends that any environmental/climate change initiatives are best funded through a mix of rates and central government funding, so that the burden does not fall disproportionately on ordinary households.

**Recommendation 5:** DPA recommends that if a levy is introduced to fund climate change initiatives that it be done in a fair and progressive way in that the greatest rates should fall on businesses/industries which are major direct contributors to climate change, and less on residential ratepayers who are on lowed/fixed incomes. In any event, the levy should then be used to fund programmes which both target big polluting industries to encourage them to positively change their behaviour and lower income and marginalised communities to help them recognise and respond more effectively to climate change.



**Recommendation 6:** DPA recommends that, in line with Article 4.3 of the UNCRPD [see above], how Environment Canterbury makes decisions around the annual plan initiatives we have commented upon should be based on a full co-design process involving disabled people and our representative organisations known as disabled persons organisations (DPOs).

## Conclusion

DPA sees much to commend in this year's annual plan. The transport and climate change initiatives will have positive long-term impacts for disabled people if fully implemented. If the Council wishes to contact us in respect of this submission, particularly around the questions we have asked, please feel free to contact either our Christchurch-based Kaituitui or Regional Policy Advisor. We also wish to appear before any oral hearings on this plan, albeit online.