

October 2023

To Christchurch City Council,

Please find attached DPA’s submission on Draft Safer Speeds Policy 2023

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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:**

* **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.

# The Submission

DPA welcomes the opportunity to feedback on the Christchurch City Council’s proposed Speed Management Plan.

We welcome all the main proposals including those around adhering to the Government’s Road to Zero policy which aims to eventually reduce and then eliminate the risk of injury and/or death on our roads for all users.

DPA supported the Government’s Road to Zero Strategy when it was first formulated given that disabled people are one of the groups at higher risk of death or injury on our roads.[[1]](#footnote-2)

Disabled people are at higher risk on our roads due to multiple factors including:

* Difficulty in crossing roads in a timely way, or not being able to move easily.
* Not being able to see and/or hear oncoming traffic (this is an increasing issue with the advent of electric vehicles),
* Slower reaction times or impaired ability to judge speed

Disabled children are particularly at risk from these factors, and these are compounded by the current speed settings in residential areas.

Disabled people and children will benefit from the proposals to lower traffic speeds in residential areas, around marae and schools.

DPA supports the principles underlying this plan which are that:

* People make mistakes and that these mistakes shouldn't cost people their lives.
* People should feel safe while using our streets.
* People can make healthier travel choices that are better for themselves, the environment and our future.
* Implement safe speeds that support land use changes as the population grows.
* Make our city more healthy, liveable and vibrant by creating streets where people feel comfortable using active modes of transport.
* Work with our partners to enable behaviour change through education and enforcement.

**Speed Management Plan proposals**

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| **Recommendation 1:** DPA strongly supports the general principles and intention of this policy to lower speed limits in the Christchurch area. |

DPA believes that it is appropriate for lower speeds (10km/h - 30km/h) to apply in areas where there are shared spaces (i.e., pedestrian malls), coastline settlements including in the Lyttleton/Banks Peninsula area and on local residential streets outside schools, marae and in places with high pedestrian activity.

Lower speeds are of particular benefit for disabled pedestrians who disproportionately live in urban communities and tend to mobilise via wheeling, walking and/or mobility devices. They also benefit blind and low vision and D/deaf people who may experience difficulties in moving away from oncoming traffic.

DPA is concerned about the relatively high speeds being proposed for rural roads in the CCC area of 60km/h-80km/h.

We note the research which shows that for every 10km/h increase in the speed limit, the less survivable an accident is. An example is that the death rate for accidents where vehicles are travelling at 50km/h is 80%, which represents a very high fatality risk rate.

DPA believes that, considering this, the proposed speed limits for rural roads of 60km/h-80km/h needs to be re-visited with a view to revising them down to 50km/h - 60km/h.

We express these concerns as while rural roads are not generally designed for pedestrian usage or by people using other modes (i.e., cyclists), there will still be pedestrians and other modal users accessing them from time-to-time. Disabled people who live in rural areas with few footpaths and who have limited transport options often need to use roadsides as footpaths, meaning that these relatively high proposed speeds will pose a risk for them. For motorists, there is often poor visibility of the roadside due to overgrown vegetation and lack of street lighting, and rural roadsides provide a difficult surface for older and/or disabled people walking or using any mobility devices.

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| **Recommendation 2:** that Council re-visit the proposed speed limits for rural roads of 60km/h-80km/h with a view to lowering them to 50km/h-60km/h. |

Safer driving behaviour is also underpinned through safety promotion and driver behaviour education. This will be key to helping achieve the outcomes which both Road to Zero and this plan outline.

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| **Recommendation 3:** thatsafety promotion and driver behaviour programmes are accessible and available to everyone, including disabled people, and this includes making information and training programmes accessible. |

**Monitoring the changes**

DPA believes that the changes should be monitored by the CCC and Waka Kotahi. DPA and other members of the public would appreciate more detail on how the changes will be monitored given that some drivers are not adhering to current speed limits.

One of the key indicators that should be monitored is accident rates across different demographics and this includes accident rates for both disabled drivers/passengers and pedestrians.

Accident rates for disabled and older people should be two of the principal indicators which should be used (alongside others) to determine where speed lowering measures might be more effective.

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| **Recommendation 4:** that the CCC and Waka Kotahi monitor accident rates, especially amongst disabled and older people. |

1. Schwartz, N., Buliung, R., Arslan, D., & Rothman, L. (2022, September). Disability and pedestrian road traffic injury: a scoping review. *Health & Place,* 77(102896), 1-13*.* [*https://www.sciencedirect.com/science/article/pii/S1353829222001575*](https://www.sciencedirect.com/science/article/pii/S1353829222001575) [↑](#footnote-ref-2)