

July 2023

To Hamilton City Council

Please find attached DPA’s submission on Draft Speed Management Plan

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/$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.

**United Nations 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

**Background**

DPA welcomes this opportunity to engage on the Draft Speed Management Plan proposed by the Hamilton City Council.

DPA notes that this management plan is being drawn up to reflect various central government transport frameworks including the Government Policy Statement on Land Transport, and Road to Zero Strategy.

DPA welcomed the introduction of the Road to Zero Strategy at the time it was introduced in 2019 by endorsing its target for a 40% reduction in our road toll by 2030 and we recommended that the targets endorsed within the plan should also extend to pedestrians.

DPA recognises that the Ministry of Transport has committed to working on the NZ Disability Action Plan, Action 5 – Accessibility transport stock take outcomes as well.[[1]](#footnote-2) These include specific measures to enhance and improve transport signage and safety provisions as well as accessibility for disabled pedestrians.

DPA recognises and supports the Council’s transport strategy, Access Hamilton – Aru Kootuitui Kirikiriroa, which emphasises inclusivity and genuine transport choices as two of its eight key outcome areas.

DPA also collaborated with transport consultants MR Cagney to produce an independent report for Waka Kotahi entitled *Transport experiences of disabled people in Aotearoa New Zealand*.[[2]](#footnote-3) This report, published in 2022, outlined the various barriers faced by disabled people when accessing public transport in this country, including around safety.

Some of the key findings of this report around safety included that disabled pedestrians felt vulnerable on shared paths with bikes and e-scooters and that the attitudes of non-disabled drivers made disabled drivers and pedestrians feel unsafe on our roads.

The abovementioned factors should be borne in mind by Council as it comes to consider this draft speed management plan which will hopefully make Hamilton’s roads and streets even safer for everyone, both motorists and pedestrians alike.

**DPA supports proposed speed management plan**

DPA supports the proposed speed management plan.

In terms of speed management principles, DPA welcomes the commitment to reduce road speeds around schools at school times to 30km/h in line with national guidelines. Applying the same speed restrictions in areas where there are high numbers of people walking, biking and crossing makes sense too, as there will be many disabled people in these categories.

DPA also agrees with the speed management priorities outlined in the plan.

We welcome the proposals made in terms of the speed management toolbox, especially those pertaining to the building of raised platforms, pedestrian refuge islands, and lanes for people on bikes as it is important that cyclists are reasonably separated from pedestrians and motorists to ensure the safety of all three road user groups.

DPA is supportive of the plans to continue running road safety promotions to promote good driver/road user behaviour.

The one recommendation we would make is that these campaigns and the promotional materials around them be made accessible to all disabled people (including children) in formats including New Zealand Sign Language, Braille, Easy Read, Plain English and audio.

Road safety campaigns conducted by Council in collaboration with Waka Kotahi and the New Zealand Police should be inclusive of everyone, including disabled people and other equity groups (i.e., Māori, Pasifika, ethnic communities, rangatahi/youth).

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| **Recommendation 1:** that road safety campaign promotional materials be made accessible to disabled people in accessible formats including i.e., New Zealand Sign Language and Easy Read. |

Our second recommendation concerns the need to involve disabled people and disability organisations as one of the key groups to be consulted by Council during the implementation and ongoing operationalising of this plan. This is to ensure that our voices are heard by Council during this process and to gain our feedback on how things are working or not.

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| **Recommendation 2:** that disabled people and disability organisations are consulted by the HCC during the implementation and operationalising of this plan. |

1. “Action – Implement transport stock tack recommendations” Office for Disability Issues, accessed August 13 2019, <https://www.odi.govt.nz/nz-disability-strategy/outcome-5-accessibility/#accordion-96-heading> [↑](#footnote-ref-2)
2. 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-3)