August 2023

To Christchurch City Council,

Please find attached DPA’s submission on Glendovey Road and Idris Road Improvements

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:**

* **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.

**UN 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

DPA welcomes the opportunity to feedback to the Christchurch City Council on the Glendovey Road and Idris Road improvements.

DPA believes that disabled people and non-disabled people alike have the right to feel safe while mobilising around our streets, whether it be through walking, wheeling or as motorists/vehicle passengers.

DPA supports many of the proposals outlined for changes to the Glendovey Road and Idris Road area to ensure safety for all people who both live and commute within the area.

However, DPA has some concerns about the improvements, mainly around the proposals to remove 98 car parks as we are concerned about the impacts on mobility car parking. Nevertheless, these issues can be easily resolved if new mobility parking spaces are created to replace those that will be lost.

DPA recommends that the new mobility spaces be created following consultation with disabled people.

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| **Recommendation 1:** that Council provide new mobility car parks to replace those that will be removed following consultations with disabled people. |

DPA fully supports the various traffic management measures proposed in this consultation including:

* The insertion of safe speed cushions.
* Discouragement of truck use on these roads.
* Placement of refuge islands for pedestrians at crossings.

All the above measures will ensure that safer, slower speeds are maintained in this area to enable greater safety for both pedestrians and motorists.

However, DPA would like to reiterate the need for separate but paralell cycleways and footpaths. We do not believe in shared spaces for both cyclists and pedestrians and that while these may sound convenient and appealing, they can also present a safety risk for both cyclists and pedestrians in terms of the increased risk of collisions between them.

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| **Recommendation 2:** that separate but parallel cycleways and pedestrian footpaths are maintained for safety reasons. |

Associated with this, we believe that not only should cycleways be indicated by painted signage on the road but also that visible signage indicating where footpaths and cycleways are located should be placed where motorists, cyclists and pedestrians can easily see them.

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| **Recommendation 3:** that visible signage is placed to indicate where cycleways and footpaths are for the benefit of all road users including motorists, pedestrians and cyclists. |

DPA welcomes the proposal to raise the height of the road to ensure greater visibility for pedestrians, motorists, cyclists and other road users. We recommend that this should be undertaken in a way where the gradient of the road is considered as the steeper the gradient, the more difficult it is for some disabled and older people to cross.

An example of this is when wheelchair and mobility aid users cross roads with a higher gradient/camber, there is often greater difficulty, energy and time taken to cross roads than would be the case for a non-disabled person. Council needs to ensure that any road raising activity does not result in un-necessarily steep gradients being created so that everyone, including disabled people, can cross roads or use footpaths in the area easily.

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| **Recommendation 4:** that Council, when raising road heights to improve visibility, ensure that gradients are level enough to enable easy crossings to be undertaken by all pedestrians, including disabled people. |

Another issue that has been identified is that of the railway crossing on Glendovey Road. The significant elevated level of the train tracks can prove a distraction to pedestrians, cyclists and motorists. We believe that Council should closely with Kiwi Rail, Waka Kotahi, and community stakeholder groups representing cyclists, pedestrians, disabled and older people, to consider the best ways to address the issues around the railway crossing.

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| **Recommendation 5:** that Council work with stakeholder groups to address safety issues around the elevated rail crossing at Glendovey Road. |

DPA would like to see that all pedestrian crossings are audio signalled for the benefit of blind and low vision people.

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| **Recommendation 6:** that all pedestrian crossings are audio signalled. |

Another accessibility issue that Council should monitor is the placement and management of trees. We see that some new tree planting activity is proposed in the Glendovey-Idris Road area.

DPA supports the planting of trees in urban environments as a means of mitigating climate change and providing shade in all weathers. What concerns us is the need for ongoing tree management, particularly to avoid protruding stumps becoming an un-necessary obstacle/barrier for disabled people and others on footpaths. We would like to emphasise that not all pathways are wide enough to manage both growing trees and pedestrians.

DPA supports Council taking a proactive approach to tree management, especially around the management and prevention of tree root growth and foliage onto footpaths.

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| **Recommendation 7:** that Council proactively manage the placement and growth of new trees, especially tree roots and foliage onto footpaths. |