September 2023

To Dunedin City Council,

Please find attached DPA’s submission on Draft Speed Management Plan 2024-2027

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 on the Dunedin 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 which include for people with mobility impairments the ability to easily cross roads in a timely way, for blind and low vision people the need to audibly hear traffic (and becoming more so with the advent of electric vehicles), for Deaf and hard of hearing people the need for more signage in high risk areas and for the growing number of older people, some or all of the above factors could affect individuals.

Disabled children are also at risk from these factors, and these are compounded by the current speed settings in residential areas, which are proposed for lowering.

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

This submission makes recommendations aimed towards enhancing the final speed management plan.

**Speed Management Plan proposals**

While DPA supports the plan as it applies to most of Dunedin, but we are disappointed that large parts of Mosgiel will not be considered for inclusion until the next speed management due in 2027.

Mosgiel has a growing population with more social and economic activity being conducted in the area. Mosgiel is also home to a considerable number of disabled people (14.7% of the town’s population) and excluding a considerable part of the township from the plan until 2027 means that the town’s disabled community (besides other residents) will not be able to enjoy the safety benefit of lower speeds, especially pedestrians.[[2]](#footnote-3)

DPA urges Council to include Mosgiel either within this plan or as part of an interim plan to ensure that everyone there gets to experience safer speeds before 2027.

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| **Recommendation 1:** that Council review Mosgiel speed limits prior to 2027. |

DPA supports re-designing the road network as a means of effecting lower road speeds part of the plan. We agree that the 50km/h speed limits on many roads (which are already in force) are still too high as these are likely to cause significant injury and even death if accidents occur.

We agree that re-designing the road network to include more traffic calming measures and urban amenity upgrades will assist the process of enabling lower traffic speeds to be introduced into more areas in the future.

Any traffic calming measures should be accessible, and disability friendly as sometimes disabled people experience discomfort when being driven over speed humps. The location of speed humps, road cushions and other traffic calming measures should be consulted upon with the disabled community and disability organisations.

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| **Recommendation 2:** that the placement of traffic calming measures like speed humps should be consulted upon with disabled people and disability organisations. |

DPA supports the proposal to undertake safety promotion and driver behaviour education. This will be key to helping achieve the outcomes which both Road to Zero and this plan outline.

All driver education and safety information programmes should be available in accessible formats including New Zealand Sign Language, Braille, Easy Read (for people with learning disabilities), large print and audio formats.

Driver education and safety promotion programmes should also be aimed at the needs of specific communities including Māori, Pasifika, ethnic communities, rangatahi/youth and disabled people whether they walk, cycle, wheel or drive.

Programmes for our disabled and other communities should be tailored to our needs by DCC, Waka Kotahi, Police and other providers with a focus on local safety hazards and issues.

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| **Recommendation 3:** that all driver behaviour and safety promotion programmes be tailored to the needs of specific communities, including disabled people. |
| **Recommendation 4:** that all driver behaviour and safety promotion programmes and resources are available in accessible formats including New Zealand Sign Language, Braille, Easy Read, large print and audio formats. |

It is important that the changes are well monitored by the DCC 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 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 5:** that the DCC 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)
2. Statistics New Zealand. (2018). *Census place summaries: Mosgiel Central.* Retrieved from[*https://www.stats.govt.nz/tools/2018-census-place-summaries/mosgiel-central*](https://www.stats.govt.nz/tools/2018-census-place-summaries/mosgiel-central)*.*  [↑](#footnote-ref-3)