

Submission on Draft Dog Control Bylaw and Policy 2024

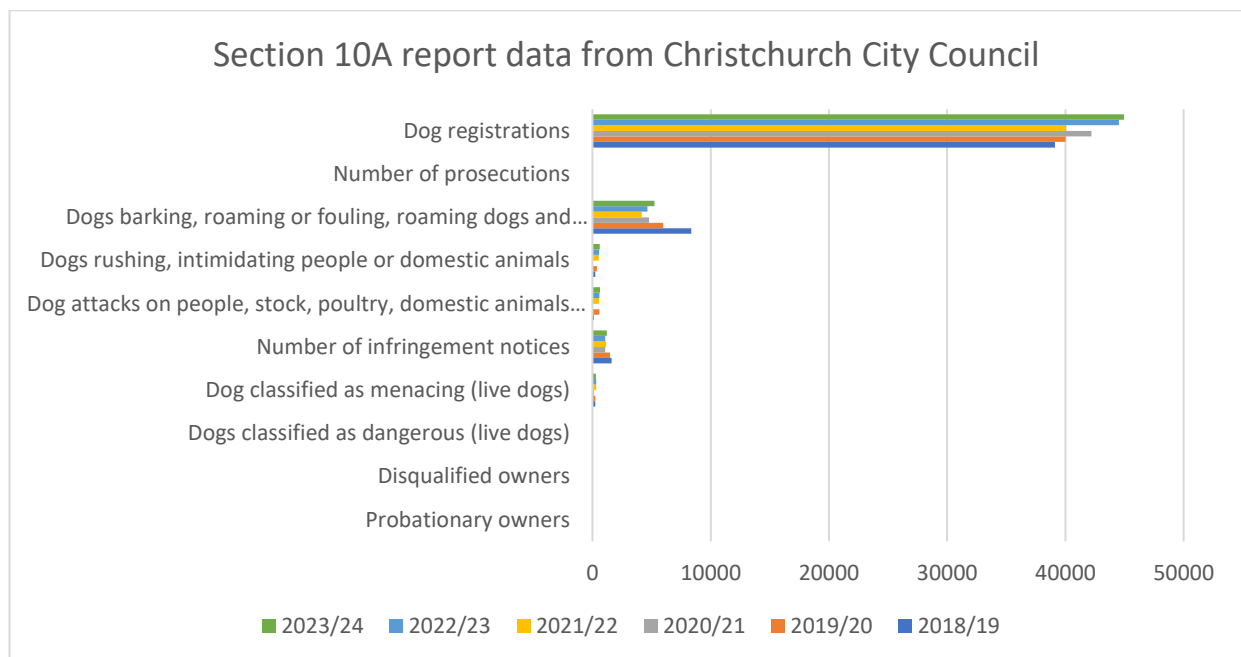
Full Name

Address with postcode

Email

I would like to speak to the Hearings Panel about my submission. My phone number is

The purpose of the combined policy and bylaw are to balance the recreational needs of dogs and their owners with appropriate controls to minimise the potential harm, distress and nuisance caused by dogs.



*In 2020/21, data on dog attacks and dogs rushing were not reported in the same format as other years and have been excluded from the analysis

Do you support the proposal to limit the number of dogs one person can be in control of in a public place? Yes

This requirement is primarily aimed at dog walkers who are acting in one form or another as commercial services, an unregulated industry. The rule will not fully address the problem, however, unless the Council enforces the rule with spot-checks at parks, beaches and reserves that are used by these operations.

Do you support the revised definition of effective control? Yes

Do you support the proposal to require dogs to be on a short leash (defined as 1.5 m) on footpaths, shared paths and formed tracks in greenspace areas where dogs are allowed? No

There are no reliable data to show that further restrictions on dogs in these settings is justified, particularly considering a new definition of effective control which should help create more certainty for education and enforcement actions.

There are legitimate concerns about public safety, however blanket ('lowest common denominator') requirements on shared paths and tracks are overly restrictive. Owners will want to use pathways whereas their

dogs will want to express natural agency. I refer to the Association of Pet Dog Trainers NZ position statement on this matter.¹

Do you support the proposal to require dogs to be on a short leash on shared paths and pedestrian areas on or near roads? Note: dogs are currently required to be leashed on roads and footpaths alongside roads. No

There are no reliable data to show that further restrictions on dogs in these settings is justified, particularly considering the Council's own enforcement data. (There are 23.7% less infringement notices being issued in 2023/24 than there were in 2018/19, despite an increase in the registered dog population of 13.8%).

I favour a more balanced approach to managing shared pathways in Christchurch involving the concept of "speed yields to vulnerability" (in conjunction with the definition of effective control). The needs of the most vulnerable user at any given time must be considered. We need a greater sense of community on our shared paths. The majority of dog owners obey the current rules and are considerate, but are being let down by the Council through lack of targeted and effective enforcement.

Do you support the proposal for the Ōtākaro Avon River Corridor? No

The proposal for this area, commonly referred to as the red zone, will severely limit the ability to use the area for enjoyment, enrichment, exercise and off-leash training. The inability to access riverbanks means that dogs will not be allowed access to enjoy the water which is essential to animal welfare in hot weather; there are already limited areas where dogs have safe water access.

If allowed to proceed in its current form, this rule will limit dogs to 1/3 of the red zone area, and only on mown grass areas. Practically speaking, it will also limit access of most dog owners to mown grass areas only. At a minimum, this creates inequities for elderly dog owners, those with physical disabilities, and families with small children.

The proposed limitations have not been justified by the Council's own data with a particular emphasis that there are no data to show that dogs are negatively impacting wildlife "*impacts on wildlife (and especially birds) from dogs cannot accurately be quantified in many situations, as data is not available*".² I accept that the Council is developing this area, in part, as an ecological corridor but this development must proceed with a more balanced approach to other users.

Other comments:

There has been an over reliance on a Dog Control Survey issued by the Council in July 2024 in developing these proposals. The survey methodology was not peer reviewed to ensure against survey bias, which was confirmed by Sean Rainey the Manager of Official Information and Privacy Officer on 20 August 2024. Mr Rainey said, "*the survey was to understand some of the public's thoughts on some particular concepts or issues to help us shape the review of our Dog Control Bylaw and Policy.*" (emphasis added)

In addition, the implications of all proposals cannot fully be understood without a map. The Council has refused to provide a map, despite requests, stating that "*We have a map that shows the current rules. The map will be updated when all the changes have been finalised.*"³ In my opinion, the lack of a map has created an unfair burden on dog handlers to fully understand the impacts of these proposals in sufficient time to submit by the Council's deadline and shows that the Council is predisposed to implement all proposals regardless of feedback.

¹ <https://www.apdtnz.org.nz/position-statement-dog-control-policies-and-leash-laws>

² Review of the Dog Control Policy 2016 and Dog Control Bylaw 2016, paper to Christchurch City Council dated 16 October 2024

³ <https://letstalk.ccc.govt.nz/dogs#dogqa>