ACCESSIBLE STREETS CONSULTATION

Submission form

The Ministry of Transport and Waka Kotahi NZ Transport Agency are proposing a collection of rule changes that we call the Accessible Streets Regulatory Package.

Thank you for taking time to tell us what you think. Please answer as many or as few questions as you choose to answer.

You can find information about these proposals in the Accessible Streets Overview (available at www.nzta.govt.nz/accessible-streets-consultation), which includes the same questions included in this online submission form. You may want to have the Accessible Streets Overview open in a different window or printed alongside you.

Please remember your submission is public information and we will use your submission to help us make the changes to the rules.

Please note that the Transport Agency will publish a summary of submissions. If you do not want your name or any identifying information to be included in anything we publish (including because you believe your comments are commercially sensitive) please indicate this clearly in your submission.

Please note that your submission is also subject to the Official Information Act 1982 (OIA). This means that other people will be able to obtain copies of submissions by making a request under the OIA. If you think there are grounds for your information to be withheld under the OIA, please note this in your submission. We will take your reasons into account and may consult with you when responding to requests under the OIA.

1. Please answer a few questions about yourself

NAME:

ORGANISATIONS REPRESENTING:

ADDRESS:

EMAIL:

PHONE:

Proposal 1: Change and re-name the types of devices that used on footpath, shared paths, cycle paths and cycle lanes

Proposal 1A: Pedestrians and powered wheelchair users

2. We are proposing to include people using powered wheelchairs in the pedestrian category. How much do you agree or disagree with this proposal?

- ○ Strongly disagree
- ○ Disagree
- ✔ Agree
- ○ Strongly agree
- ○ I don't know

What was the reason for your rating? Do you have any other comments?

These users travel at about walking speed or a little faster and are typically move cautiously about others. They are similarly vulnerable to the actions of other road users as are pedestrians. They should have to abide by any speed limit set for the footpath.

Proposal 1B: Changing wheeled recreational devices

3. Our proposed change will replace the wheeled recreational device category with two new groups of devices: unpowered transport devices (for example push-scooters, skateboards) and powered transport devices (for example e-scooters, YikeBikes).

We are proposing to include people using powered wheelchairs in the pedestrian category. How much do you agree or disagree with this proposal?

- ○ Strongly disagree
- ○ Disagree
- ✔ Agree
- ○ Strongly agree
- ○ I don't know

What was the reason for your rating? Do you have any other comments?

We agree that different categories are needed to overcome the problems with the current ones and to enable different rules to be set for different categories to keep pedestrians and others safe.
However, we propose that these be based on speed potential and mass (see para 4 below) rather than wheel size, power output or any other proxy for speed and user since it is the

4. We're proposing that the new category of powered transport devices will consist of low-powered devices that have been declared by the Transport Agency not to be a motor vehicle.

What steps (if any), do you think the Transport Agency should take before declaring a vehicle not to be a motor vehicle?

An assessment of the vehicle ' s safety for the user and other road users and its suitability for the part of the road that it will be able to be used on. However, with the categories and definitions we propose (see comments in response to Q3) it would be extremely rare that any such declaration would be needed.
However, the ability should be there to deal with any new device that does not meet the

5. If the Transport Agency declares a vehicle to not be a motor vehicle, do you think it should be able to impose conditions?

- [x] Yes
- [ ] No

6. If yes, should the Transport Agency be able to apply conditions regardless of the power output of the device?

- [x] Yes
- [ ] No

What was the reason for your answer? Do you have any other comments?

Vehicles should be able to be put into mutually-exclusive categories as we have proposed (see comments in response to Q3), with LITDs being defined as not being motor vehicles provided they met the definition of an LITD (i.e. being unpowered or powered devices designed for transporting one person and either not capable, by design, of travelling on the flat at more than 6km/h or, if capable of travelling faster then having a unladen mass of no

7. We propose to clarify that:

a) low powered vehicles that have not been declared not to be motor vehicles by the Transport Agency (e.g. hover boards, e-skateboards and other emerging devices) are not allowed on the footpath

b) these vehicles are also not allowed on the road under current rules, because they do not meet motor vehicle standards and cannot be registered.

c) if the Transport Agency declares any of these vehicles not to be motor vehicles in the future, they will be classified as powered transport devices and will be permitted on the footpath and the road (along with other paths and cycle lanes).

How much do you agree or disagree with this proposal?

- [x] Strongly disagree
- [ ] Disagree
- [ ] Agree
- [ ] Strongly agree
- [ ] I don't know

What was the reason for your rating? Do you have any other comments?

We oppose in the strongest possible way any proposal that vehicles be allowed to be used on the FOOTpath simply because they have been declared not to be motor vehicles. The use of some of these vehicles on footpaths is incompatible with their use by pedestrians, some of whom are disabled and some of whom are frail.
Instead of turning FOOTpaths into shared paths by allowing the categories of vehicle

Proposal 1C: Clarifying cycles and e-bikes

8. Child cycles that are not propelled by cranks, such as balance bikes, will be defined as transport devices.

   How much do you agree or disagree with this proposal?

   - ○ Strongly disagree
   - ○ Disagree
   - ✔ Agree
   - ○ Strongly agree
   - ○ I don't know

   What was the reason for your rating? Do you have any other comments?

   We agree that small-wheeled cycles that are propelled by cranks be defined as cycles - that they are small-wheeled is irrelevant.
   In our proposed scheme (see response to Q3) cycles of any wheel size that are not propelled by cranks, but are still purely human-powered or gravity-powered, would be defined as unpowered LITDs. If they lacked a crank but were still propelled by a motor (e.g. via a shaft

Proposal 1D: Mobility devices

9. We're proposing that users of mobility devices will have the same level of access as pedestrians, but they will have to give way to pedestrians and wheelchair users.

   How much do you agree or disagree with this proposal?

   - ○ Strongly disagree
   - ○ Disagree
   - ✔ Agree
   - ○ Strongly agree
   - ○ I don't know

   What was the reason for your rating? Do you have any other comments?

   We have detailed our rule on who gives way to whom in our response to Q13 below. Users of mobility devices other than wheelchairs giving way to pedestrians and wheelchair users is consistent with our proposed rule.
   Under our proposal, mobility scooters which cannot exceed 6km/h would be classified as low-speed individual transport devices, would not have

10. Do you think there will be any safety or access-related problems with mobility devices operating in different spaces? Please explain.

    If the scheme we propose is adopted then any safety or access-related problems with mobility devices will be minimal.
    What we propose enables all mobility devices that have minimal potential (by virtue of the limitation on speed that is required for them to be considered as low-speed, powered LITDs.) to give rise to safety concerns for their users or other footpath users to be used on footpaths

11. We intend to review the mobility device category at a later date. What factors do you think we need to consider?

The potential speed of devices available and the ability to monitor and record speed;
The ability for the users to self-monitor speed; The ability to limit speed in a tamper-proof way;
The ability for Police to rapidly ascertain what speed a mobility device has been limited to.
The competence of the rider to maintain control of the device;
The degree to which the device is needed to enable a person to move about their community

Alternative proposal

12. We have outlined an option to not change vehicle definitions. This means we would make changes at a later date instead. Do you prefer this option to our proposal to change vehicle definitions now (see proposals 1A, 1B, 1C, 1D for more details)? Why/why not?

We prefer a change to the definitions but not in the way proposed in the Accessible Streets package.
We have proposed a better alternative scheme of road user and vehicle definitions (see response to Q3) combined with location of use rules (see response to Q7) and behavioural rules (see response to Q13) that:

Proposal 2: Establish a national framework for the use of footpaths

13. Our proposed changes will allow mobility devices, transport devices, and cycles on the footpath – provided users meet speed, width and behavioural requirements.

How much do you agree or disagree with this proposal?

- [x] Strongly disagree
- [ ] Disagree
- [ ] Agree
- [ ] Strongly agree
- [ ] I don't know

What was the reason for your rating? Do you have any other comments?

We disagree in the strongest possible terms with the proposal to allow users of all these devices/vehicles to use them on the footpath and with the 15km/h speed limit proposal.

However, we agree with the other proposed rules.

14. Do you think there should be any other requirements, in addition to speed, width and behaviour?

See response to Q13

15. We have outlined two alternative options to address cycling on the footpath. These are:

    a) Allow cyclists up to 16 years of age to use the footpath

    b) Continue the status quo, where most cyclists are not allowed to use the footpath.

    c) Neither option.

    What option do you prefer instead of allowing cyclists on the footpath?

    - ◯ A
    - ◯ B
    - ✔ C

16. Would you support an age limit for cycling on the footpath? What age would you prefer?

    - ✔ Yes, I would support an age limit
    - ◯ No, I would not support an age limit

    If yes, what age would you prefer?

    We accept that most children 10 years old and younger lack the mental faculties to be able to safely use roads and so are willing to accept them being allowed to ride unpowered cycles on footpaths irrespective of wheel size. This would maintain the intent of the wheel size rule.
    Age is a readily verifiable criterion.
    The rules regarding behaviour and speed (6km/h), if abided by, should

17. We propose to allow road controlling authorities to restrict cycle or device use on certain footpaths or areas of footpaths to suit local communities and conditions.

    How much do you agree or disagree with this proposal?

    - ◯ Strongly disagree
    - ◯ Disagree
    - ✔ Agree
    - ◯ Strongly agree
    - ◯ I don’t know

    What was the reason for your rating? Do you have any other comments, including on the proposed process?

    We agree with this but it should apply only to where children 10 years old or younger can cycle on footpaths and where low-speed LITDs and unpowered LITDs can be used on footpaths (as under the scheme we propose these, along with pedestrians, are the only legal users of footpaths).
    There are stretches and areas of footpaths where pedestrian numbers are sufficiently high at

18. We envisage that local authorities will make decisions to regulate the use of paths by resolution, rather than by making a bylaw. Do you agree this be specified in the Land Transport Rule: Path and Road Margins 2020 to provide certainty?

- [x] Yes
- [ ] No

What are the reasons for your answer? Do you have any other comments?

This makes the task of doing so less onerous. As long as it is still subject to due public process and is guided by sensible criteria making things easier, it is a good idea.
Specifying this ability in the Land Transport Rule: Path and Road Margins 2020 seems like it would provide certainty as long as it was not also subject to provisions of the Land Transport Act. It is unclear whether regulations override primary legislation.

Alternative proposal

19. We're proposing that road controlling authorities consider and follow certain criteria in addition to their usual resolution processes if they want to restrict devices from using the footpath These criteria are:

- consider relevant guidance developed by the Transport Agency
- consider any alternative routes or facilities that will no longer be available to the user due to a restriction
- consider any other matter relevant to public safety.

The road controlling authority will need to:

- consult with any party affected by the proposed restriction
- give those parties reasonable time to respond
- take their submissions into account

How much do you agree or disagree with this proposal?

- [ ] Strongly disagree
- [ ] Disagree
- [ ] Agree
- [x] Strongly agree
- [ ] I don't know

What was the reason for your rating? Do you have any other comments about how will this affect you or whether you think the proposed changes are practical?

Our proposed set of user/vehicle classes (Q3), location of use rules (Q7) and behavioural rules (Q13), making it legal for only pedestrians and users of wheelchairs, unpowered LITDs, low-speed powered LITDs and children 10 years old and younger and their trainers riding cycles to use the footpath, make it less likely that road controlling authorities will need to restrict users from the footpath but they should still have the ability to do so. However, they

20. We have also outlined an option to maintain current footpath rules. Would you prefer this option instead of the proposed framework with speed and width requirements? Why/why not?

We agree that footpath use rules need to be clarified - the status quo shouldn't remain as there are already people being injured on the footpaths or deterred from using them especially in places where e-scooters are used on footpaths.
Much of the problem has arisen because certain devices have been declared not to be motor vehicles while other relatively similar devices are regarded as motor vehicles.

Proposal 2A: Users on the footpath will operate vehicles in a courteous and considerate manner, travel in a way that isn't dangerous and give right of way to pedestrians

21. We propose that pedestrians should always have right of way on the footpath.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ○ Agree
    - ✔ Strongly agree
    - ○ I don't know

    What was the reason for your rating? Do you have any other comments?

    We believe that wheelchair users should have this priority but that pedestrians are next highest on the priority list with all other footpath users giving way to them (see response to Q13).
    This is to make it clear that footpaths are for pedestrians but making special allowance for disabled people using wheelchairs. This is consistent with common (but not universal)

22. This proposal will require footpath users to operate vehicles in a courteous and considerate manner; travel in a way that isn't dangerous; and give way to pedestrians.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ○ Agree
    - ✔ Strongly agree
    - ○ I don't know

    What was the reason for your rating? Are there any other requirements we should consider?

    Coupled with the width limit and a sensible speed limit they should be sufficient (if abided by) to make footpaths safe and comfortable places to walk.
    However, it may be beneficial to define ' give way ' or ' give right of way '. It shouldn't apply only to situations when one or more footpath user is changing direction (turning). It does not appear to be defined elsewhere in any of the Rules or the primary legislation.

Proposal 2B: Default 15km/h speed limit for vehicles using the footpath

23. We are proposing to set a default speed limit of 15km/h for footpaths.

    How much do you agree or disagree with this proposal?

    - [x] Strongly disagree
    - [ ] Disagree
    - [ ] Agree
    - [ ] Strongly agree
    - [ ] I don't know

    What is the reason for your rating? Do you think the proposed speed limit should be higher or lower?

    Any speed limit should be much lower to ensure the safety and comfort of the primary users - pedestrians. See response to Q13 above.

24. Under the proposed changes, road controlling authorities will be able to lower the default speed limit for a footpath or area of footpaths.

    How much do you agree or disagree with this proposal?

    - [ ] Strongly disagree
    - [ ] Disagree
    - [x] Agree
    - [ ] Strongly agree
    - [ ] I don't know

    What is the reason for your rating? Do you have any other comments?

    This is unnecessary if the speed limit is set at a sensible level in the first place. Given that we are talking about FOOTpaths, it would seem that the most sensible speed limit is walking speed.
    However, if central government sets the default speed limit for footpaths above this speed, then road controlling authorities should be able to lower it for a footpath or area of footpaths in

25. Are there other ways that you can think of to improve footpath safety? Please explain.

    There could be a requirement to travel by vehicle out of driveways at very low speeds (e.g. 5km/h).
    And there could be a requirement that visibility of the footpath to the side of where the driveway meets it be a minimum distance (e.g. 5m). This might require use of visually permeable fencing and removal of vegetation.

Proposal 2C: 750mm width restriction for vehicles that operate on the footpath

26. We are proposing that the width of devices used on the footpath should not exceed 750mm (with the exception of wheelchairs). Do you think this is:

- ◯ Too wide
- ✔ About right
- ◯ Too narrow

What is the reason for your rating? Do you have any other comments?

This is suitable as long as exemptions are possible for people for whom this would impose undue discomfort or hardship.
750mm is half the width of the typical footpath so should be the general limit as any wider would unduly impact on other footpaths users.

27. Do you use a mobility device?

- ◯ Yes
- ✔ No

If yes, what is the width of your device? Would the proposed width restriction impact you?

28. Should a maximum width limit apply to mobility devices?

- ✔ Yes
- ◯ No

What is the reason for your response?

This is covered by Q26. Focus should be on potential impact on others but provide for exceptions in special circumstances.

29. We propose that people who already own a device wider than 750mm could apply for an exemption. We're also considering three alternative approaches to mitigate the impact on existing device owners.

Which is your preferred option?

- ◯ a. Mobility devices purchased before the rule changes would be automatically exempt from the width limit.
- ◯ b. The Transport Agency could declare certain wider devices to be mobility devices under section 168A of the Land Transport Act and exclude them from width requirements.
- ✔ c. Apply a separate width limit to mobility devices.

Do you have any comments on these alternatives?

Requiring an exemption to be applied for (with perhaps a special authorisation sticker to be displayed) enables NZTA to get the best possible idea of the number of devices wider than 750mm. From that knowledge it could develop and apply appropriate policy.
Date of purchase is too difficult to prove for many people so option a) is impractical.

Proposal 3: Establish a national framework for the use of shared paths and cycle paths

30. We are proposing that a person using a shared path or cycle path must travel:

    a) in a careful and considerate manner
    b) at a speed that is not dangerous to other people on the path
    c) in a way that doesn't interfere with other people using the path.

    How much do you agree or disagree with these proposed behavioural requirements?

    - ○ Strongly disagree
    - ○ Disagree
    - ○ Agree
    - ✔ Strongly agree
    - ○ I don't know

    What is the reason for your rating? Should there be other requirements or rules to use a shared path or cycle path?

We agree with users having to use shared and cycle paths in a careful and considerate manner, to not endanger other users and without interfering with other users.
Different rules should apply to shared and cycle paths with shared paths expected to have a wide diversity of users including people in wheelchairs, pedestrians, and LITD users whereas cycle paths would not be expected to be attractive to pedestrians and others capable of only

31. We propose that all users will need to give way to pedestrians when using a shared path.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ○ Agree
    - ✔ Strongly agree
    - ○ I don't know

    What is the reason for your rating? Do you have any other comments?

Cycles and medium-speed LITDs < unpowered LITDs < low-speed LITDs < pedestrians < wheelchairs
Agree over all users except people in wheelchairs

32. We propose that, if a shared path or cycle path is adjacent to a roadway, the speed limit will be the same as the roadway – which is currently the case. If a shared path or cycle path is not located beside or adjacent to a roadway, then our proposed change clarifies that the path has a default speed limit of 50km/h.

    How much do you agree or disagree with the proposed speed limits for shared paths and cycle paths?

    - [x] Strongly disagree
    - [ ] Disagree
    - [ ] Agree
    - [ ] Strongly agree
    - [ ] I don't know

    What is the reason for your rating? Do you have any other comments, including on the proposal to allow road controlling authorities to change limits?

    Remember a basic rule of land transport safety - if mixed types of road user use the same space then speeds should be low so that the speed differential between users is low.
    The speed limit on the adjacent road is pretty irrelevant and a speed limit of 50km/h on a shared path where pedestrians and disabled people are expected to be is simply absurd.

33. We are proposing that road controlling authorities should be able to declare a path a shared path or a cycle path by making a resolution.

    How much do you agree or disagree with this proposal?

    - [ ] Strongly disagree
    - [ ] Disagree
    - [x] Agree
    - [ ] Strongly agree
    - [ ] I don't know

    What is the reason for your rating? What factors should be considered when road controlling authorities make this decision?

    We agree provided the path meets a minimum width requirement of 2.5m
    (and greater depending on numbers of different types of users observed
    or, in the case of a new path, expected - see Table 7.4 Austroads 2009).

    Declaring a path to be of a certain type invokes the rules that apply to

34. Do you think that the Transport Agency should be able to investigate and direct road controlling authorities to comply with the required criteria?

    How much do you agree or disagree with this proposal?

    - [x] Yes
    - [ ] No

    What is the reason for your response? Do you have any other comments?

    This oversight by the NZTA is required because some local councils can be led astray by poor advice or by wilful staff or elected representatives.
    But, for this to be satisfactory, NZTA needs to perform better than it has in recent years on monitoring and enforcing requirements.

Proposal 4: Enable transport devices to use cycle lanes and cycle paths

35. We are proposing that devices other than cycles should be allowed to use cycle lanes and/or cycle paths?

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What is the reason for your rating? Should there be any other requirements?

    Because medium- and high-speed powered LITDs and cycles pose too great a negative effect on the safety and perception of safety of pedestrians, wheelchair users etc, it is not appropriate that they be used on footpaths.
    However, users of all different forms of transport deserve to have a safe space in which to

36. We are proposing that road controlling authorities should be able to exclude transport devices from cycle lanes and/or cycle paths?

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What is the reason for your rating? Should there be any other requirements?

    Some powered transport devices are capable of speeds that are incompatible with the speeds that are to be expected from most people riding cycles and most low-powered devices.
    These high speed devices (high-speed powered LITDs) should be used on the ordinary roadway where the speed limit is not more than 50km/h (i.e. treated much like mopeds).

Proposal 5: Introduce lighting and reflector requirements for powered transport devices at night

37. We are proposing that powered transport devices must be fitted with a headlamp, rear facing position light, and be fitted with a reflector (unless the user is wearing reflective material) if they are used at night.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    Users are vulnerable to injury and using lights to alert other road users to their presence is one way users can help avoid being injured. Some users (as well as people riding cycles) seem unaware of just how difficult they can be to see at night) and this measure would help to make them aware of that fact.

38. Do you think these requirements are practical? For example, if you own a powered transport device, will you be able to purchase and attach a reflector or lights to your device or yourself?

    Yes. With the alternative given in response to Q37, at least one way will be possible.

39. Do you think unpowered transport device users should be required to meet the same lighting and reflector requirements as powered transport device users at night time?

    Yes if using shared paths, cycle paths, cycle lanes or the roadway
    If we ' re trying to create a safe system it ' s not about whether the transport device is powered or unpowered but about where they are used, how fast they are going, how vulnerable the users are to injury and whether they can be easily seen or not. Requiring lights of anyone travelling along cycle paths, lanes and roadways during hours of darkness helps to

Proposal 6: Remove barriers to walking, transport device use and cycling through rule changes

Proposal 6A: Allow cycles and transport devices to travel straight ahead from a left turn lane

40. We propose that cyclists and users of transport devices (like skateboards and escooters) should be able to ride straight ahead from a left turn lane at an intersection, when it is safe to do so.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    One of the most uncomfortable places to be on the road is between traffic in a left turn lane and traffic in a straight ahead lane. Trying to get across to that position is sometimes even more terrifying.
    Riders should not have to experience that level of discomfort - they should be able to feel safe.

Proposal 6B: Allow cycles and transport devices to carefully pass slow-moving vehicles on the left, unless a motor vehicle is indicating a left turn

41. We propose that cyclists and users of transport devices (like skateboards and escooters) should be allowed to 'undertake' slow-moving traffic.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    This enables riders to get to the front of the lane where they are most visible and from where they are able to clear the intersection most safely rather than in amongst motor traffic. It also ties in well with places where there are light phases specifically for cycle riders to cross the intersection.

Proposal 6C: Give cycles, transport devices and buses priority over turning traffic when they're travelling through an intersection in a separated lane

42. We propose that turning traffic should give way to buses, cyclists, and users of transport devices travelling straight through an intersection from a separated lane.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    This treats all road users on the same basis - those travelling straight have priority over those turning. Whether a separate lane is involved or not is somewhat irrelevant or should be.

43. Our proposed change will introduce a list of traffic control devices used to separate lanes from the roadway to help you understand what a separated lane is and if the user has right of way at an intersection. Is such a list necessary?

    - ✔ Yes
    - ○ No

    What was your reason for your response? Do you have any other comments about the proposal?

    Anything that helps to clarify expected behaviours is useful. For example, making it clear that dashed white lines marking out a cycle lane across the entrance to a side street requires turning traffic to give way to riders in the lane travelling straight past the side street cross would enhance safety. A common understanding of road marking and symbols and signs is essential.

44. Should the definition of a separated lane include the distance between the lane and the road?

    - ✔ Yes
    - ○ No

    What was your reason for your response? Do you have any other comments about the proposal?

    But it should not require absolute juxtaposition of the lane. Separated lanes that are less than a car length (say 7-8m) from the adjacent roadway should be treated as if immediately adjacent because it would be unsafe for a car to turn into the road and then stop before reaching the separated lane (e.g. Figure 3F in the consultation overview).
    In contrast, priority for users of lanes/paths further away can be covered by the next rule

Proposal 6D: Give priority to footpath, shared path and cycle path users over turning traffic where the necessary traffic control devices are installed

45. We propose that turning traffic should give way to path users crossing a side road with the proposed minimum markings of two parallel white lines.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ○ Agree
    - ✔ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

This has potential to increase the efficiency of walking and other modes using footpaths, shared paths and cycle paths and that should help to encourage more people to use those modes. That would be consistent with government objectives to decrease motor vehicle congestion and pollution, as well as making for more pleasant cities.
This is the only aspect of this entire package which may (if road controlling authorities actually

Additional questions for road controlling authorities

46. Do you think that the proposed minimum markings of two parallel white lines are appropriate? Please explain.

But they are a bare minimum. Ideally, raised platforms would be used to indicate priority, to keep the level of the paths the same across the side road and to slow traffic. However, those are comparatively expensive and two parallel white lines about the width of the path apart (say 2m) painted across the side road seems like an unambiguous and cheap method to indicate priority.

47. We are proposing future guidance for additional treatments. Is there any guidance that you would like to see or recommend? Please explain.

'Sharks teeth' markings on the approach side of the white lines would make them more obvious and alert drivers more effectively. These markings would be perpendicular to the two white lines with the sharp part of the triangle pointing in the direction from which the cars are coming.

Proposal 7: Mandate a minimum overtaking gap for motor vehicles passing cycles, transport devices, horses, pedestrians and people using mobility devices on the road

48. We are proposing a mandatory minimum overtaking gap for motor vehicles of 1 metre (when the speed limit is 60km/h or less), and 1.5 metres (when the speed limit is over 60km/h) when passing pedestrians, cyclists, horse riders, and users of other devices.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    Being overtaken too closely by a motor vehicle is one of the most scary experiences of riding or walking on the road. Increasing the distance between passing cars and other road users will help increase the perception of safety and actual safety for cyclists and other road users. A similar rule should be applied to LITD users passing pedestrians on shared paths (see response to Q30)

Proposal 8: Clarify how road controlling authorities can restrict parking on berms

49. We are proposing that road controlling authorities should be able to restrict berm parking without the use of signs and instead rely on an online register.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ✔ Disagree
    - ○ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    We believe there should be a general prohibition on parking on berms but with exceptions possible and at the discretion of RCAs. Having to have signs indicating the prohibition is both expensive and creates visual clutter. A general prohibition greatly decreases the need for signs. Expecting people to find out where exceptions apply by consulting a register, even if it is on-line, is unreasonable. There is a general expectation that if something is not allowed

50. Would it be helpful if information on berm parking restrictions was available in other places, like at a local library, i-SITE, or a local council?

    Only if signs or markings aren ' t used, because not everyone has access to the internet or a mobile device to be able to check the register when the need arises. But markings provide a less obtrusive and cheaper way than signs to indicate a where parking on the berm is permitted.This will make bus travel more efficient by quickening journeys and so will make it a more attractive mode, contributing to more people using it instead of private cars which will

Proposal 9: Give buses priority when exiting bus stops

51. We propose that road users should give way to indicating buses leaving a signed bus stop on a road with a speed limit of 60km/h or less.

    How much do you agree or disagree with this proposal?

    - ○ Strongly disagree
    - ○ Disagree
    - ✔ Agree
    - ○ Strongly agree
    - ○ I don't know

    What was your reason for your rating? Do you have any other comments about the proposal?

    This will make bus travel more efficient by quickening journeys and so will make it a more attractive mode, contributing to more people using it instead of private cars which will make cities better for all.

52. Should traffic give way to buses in other situations? For example, when a bus is exiting a bus lane and merging back into traffic lanes?

    - ✔ Yes
    - ○ No

    In what situations should traffic give way to buses? What was your reason for your response? Do you have any other comments?

    We support measures that make public transport more efficient and attractive because we support the aims of decreasing congestion and pollution and increasing the provision of equitable, safe travel options.

Thank you for making a submission on the Accessible Streets Regulatory Package.

Visit www.nzta.govt.nz/accessible-streets-consultation for updates or if you have any questions please email us at accessible.streets@nzta.govt.nz