

# Living Streets Aotearoa



## Submission from Living Streets Aotearoa to NZTA on Land Transport Rule: Regulatory Stewardship (Omnibus) Amendment 2018

### Submission

Living Streets Aotearoa thanks NZTA for this opportunity to submit on the Land Transport Rule: Regulatory Stewardship (Omnibus) Amendment 2018.

Our submission focuses on a few areas only.

### Road User Rule 2004

PROPOSAL 10 Definition of headlamp – from 100m to 200metre visibility

Living Streets support the ability of cyclists to see and be seen.

The increasing brightness and now increase in visibility to a distance of 200 metres of headlamps means that lights can often dazzle pedestrians particularly in shared zones. This effect can increase if the cycle light is flashing. This reduces the safety and amenity of those paths for pedestrians. Living Streets submit that lights need to be correctly fitted to a bike or car so that they do not dazzle other road users, such as being able to dip the beam or reduce the light intensity. This rule should include a requirement that headlamps are properly fitted and do not dazzle other users.

The definition of ‘headlamp’ does not make it clear that the lamp should be affixed to the body of the vehicle. Particularly for bikes this could be interpreted to mean that wearing a headlamp on one’s head (ie helmet) is legal. Living Streets note that lights worn on the head easily dazzle other road users including pedestrians. Living Streets submit that cycle headlamp should be defined to mean affixed to the vehicle not the person.

PROPOSAL 13 Create an offence of turning or entering into a road where a traffic sign prohibits this. Living Streets support this proposal to make enforcement more straightforward and to be apply a nationally consistent penalty to vehicle users.

We do not see any need to extend this rule to pedestrians (for example, pedestrians entering into roads with ‘road closed’ signs). Many road signs only make sense to vehicle users, for example, many roads have ‘no exit’ signs where there is clearly a pedestrian path exit.

PROPOSAL 15 Electric vehicle charging sites

Living Streets submit that the rule permit EV's to park in these spaces only while they are charging so as to ensure that EV charging is more readily available to a greater number of users.

**PROPOSAL 18** Change the definitions of 'zone parking', 'zone parking restriction' and 'zone restriction'.

Living Streets supports the change to allow fewer signs to be required for vehicle parking. These signs are invariably located on the footpath causing clutter and obstruction to pedestrians.

**PROPOSAL 19** Amend the requirements for bus stop signs and markings to allow a 30 m marked outline and one sign.

Living Streets supports the change to reduce the signage required at bus stops up to 30 metres long. Bus stop signs are located on footpaths and cause clutter and obstruction to pedestrians.

**PROPOSAL 22** Allow for a generic text option in component 4 for R6-4 parking signs in Schedule 1, to allow the sign to describe the area it applies to.

Living Streets support the ability to reduce the amount of signage required to indicate that vehicles should not park on grass verges.

Living Streets sees the need to be consistent and clear as per the Road Rules 2004 that parking is not allowed on any grass verges in urban areas. Parking on grass verges leads to a loss of public space for non-vehicle activity, and damages verges. Local authorities should not have to go through a bylaw making process or provide signs to prevent verge parking as it is already covered by the Road Rule. There is a significant problem with vehicles parking on footpaths and grass verges, and there should be national consistency that this is not permitted by the Road Rules.

#### **Traffic Control Devices 2004**

Clause 6(3)(3)(b) Specify width and colour of lines to guide pedestrians at crossings in accordance with 8.5

Living Streets supports this change to ensure national consistency in pedestrian crossing markings.

Clause 11.4 Facilities for cycles, wheeled recreational devices and mobility devices

The proposal states that signs are less effective than marking. Can you please provide a reference for this research.

Clause 11.4.2

Living Streets submit that if shared paths require marking of direction or separation of user then they do not comply with best practise standards for shared paths (that is low user numbers and in non-urban areas not used as a commuter route). Signposting or marking is not a substitute to providing a safe path for both pedestrians or cyclists and other recreational device users. Shared path status should be removed in this case and separated paths provided.

Living Streets find that shared paths are already inadequately signposted/marked and compliance with normal road rules (such as appropriate speeds, give way, safe passing distance, keeping left) is not good. Removing signs will not improve this situation. Removing signposts will increase the likelihood that cyclists will continue on to use footpaths, which often look identical to shared paths.

Living Streets does not support this change.

## **About Living Streets**

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- ! to promote walking as a healthy, environmentally-friendly and universal means of transport and recreation
- ! to promote the social and economic benefits of pedestrian-friendly communities
- ! to work for improved access and conditions for walkers, pedestrians and runners including walking surfaces, traffic flows, speed and safety
- ! to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see: [www.livingstreets.org.nz](http://www.livingstreets.org.nz)

Contact person: **Ellen Blake**  
Email: **wellington@livingstreets.org.nz**  
Phone: **021 106 7139**  
Date: **15 August 2018**