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## Reshaping Streets regulation changes

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Tēnā koutou

### **Submission on Reshaping Streets proposed regulation changes**

- 1 The Dunedin City Council (DCC) welcomes the opportunity to submit to Waka Kotahi NZ Transport Agency (Waka Kotahi) on Reshaping Streets consultation.
- 2 The DCC took part in Innovating Streets two years ago, as did many other Councils. As happened in other parts of the country the changes were unpopular and not supported by many in the community. Therefore, the proposed Reshaping Streets changes will be of concern to many in the community. The DCC submits that strong and meaningful engagement will be required before any trials are implemented.
- 3 The DCC supports the enabling aspects of the Reshaping Streets proposal and thanks the Minister of Transport for providing additional opportunities for local decision-making and opportunities for communities to lead active transport and placemaking initiatives.

### ***Proposal One: A new approach for piloting street changes***

- 4 The DCC supports the proposed changes for local authorities to be flexible, and experimental with trial activations. The DCC believes that the ability to test over two years is beneficial because it will enable communities to experience the changes and provide feedback on how it could be improved, removed, or permanently implemented. The flexibility to allow trials to evolve will include more of the community having input into the final version.
- 5 The DCC agrees that the proposed ability to temporarily reduce speed limits will be beneficial to activate trials in an efficient and safe manner but would need to be enforced to make any real change.

- 6 In order for these temporary street changes and speed reductions to be successful there will be a need for active enforcement to support the change process.
- 7 The DCC would like to highlight that any trial will require meaningful and ongoing consultation/engagement with the community if they are to be successful and that pre-implementation consultation should be undertaken.
- 8 The DCC seeks clarity on how funding streams will be provided and aligned with trials and any permanent installations to avoid having to remove trials (or parts of) because of funding constraints both within Council and through the National Land Transport fund.
- 9 The DCC submits that pilots for school and community streets should be driven from the community, Community Boards and/or schools and should align with Road to Zero and carbon neutral goals of the City.
- 10 The DCC would like to seek clarity as to why the ability to trial lower speed limits is restricted to areas where the current speed limit is under 60k/h. The DCC would support the ability to trial new Traffic Control Devices (TCD) and lower speed limits in areas on the urban fringe where current speed limits are higher, ahead of longer-term speed limit changes included in the Speed Management Plan.
- 11 The DCC supports the ability to trial new signs, markings and signals. There are a lot of tried and tested initiatives from overseas that would work in New Zealand. However, it is unclear how Waka Kotahi would keep track of various signs or markings in a trial situation. If the trial is successful, the timeframe for approval into the TCD manual would need to be in line with the trial end date, so that it can be permanent.
- 12 The DCC submits that the guidance and rule changes will need to take into account any implications for enforcement of the trial signs, markings and signals.
- 13 The DCC suggests it is made clear that trials cannot be held upon trials, so that if a 2-year trial ends, another cannot be held.

### ***Proposal Two: Filtering and restricting traffic***

- 14 The DCC is committed to being carbon neutral by 2030 and supports being enabled to create safer and healthier spaces for active transport. Enabling these spaces for safe and sustainable transport will be a key lever to be able to work towards more active modes and carbon neutral transport.
- 15 The DCC supports strong community engagement to make changes such as this and pre-implementation engagement should be robust.
- 16 The DCC supports investigating the creation of new signs and markings that make it clear what the expected behaviours are for active modes in areas designated for only active modes (or two-way active modes with one-way motorised traffic) and believes greater enforcement is necessary. Currently there is some confusion about where cyclists are permitted to ride, and why.
- 17 The DCC seeks greater clarity on how the power to install objects as modal filters would operate on a trial or permanent basis and whether RCAs are still required to pass a traffic resolution if the trial is successful. Additionally, it would be beneficial if the guidance documentation described what RCAs are allowed to include in the trials, and what is exempt.

- 18 The DCC requests guidance to clarify what kind of traffic restrictions or prohibitions would be allowed under this rule. The DCC would support the ability to control the movement of high emission vehicles to be able to create spaces for people to enjoy.
- 19 The DCC supports the proposal that RCAs may install or remove on-street carparks and change street layouts as it contributes to simplifying the process for trials. This rule would need to either work alongside RCA parking bylaws or would need to override RCA parking bylaws. Currently any changes to parking are required to be signed off through a process outlined in the DCC parking bylaw.

### ***Proposal Three: School Streets***

- 20 The DCC submits that getting support and leadership from schools and the community is crucial to the success of any intervention around schools. Changes around schools should be driven by those who use and experience the school area. Additionally, the DCC notes that to ensure success, any changes to parking, road layouts, and speeds around school will need to be enforceable.
- 21 The DCC notes that the guidance should include how to properly plan for designated pick up/drop off zones and how they are integrated into the trial to avoid shifting the problem of cars at the school gate onto surrounding streets.
- 22 The DCC submits that arrangements for children with challenges in getting to school in any other way than by private motor vehicle should be considered as part of any change.
- 23 The DCC suggests that the Road to Zero communication and information around school safety be a focus for Waka Kotahi. This information will help Councils share the messaging around road safety and teaching children to use active modes linked to carbon zero goals.

### ***Proposal Four: Community Streets***

- 24 The DCC is supportive of the ability to create safe areas for the community to hold events in their local streets.
- 25 The DCC suggests that the consultation requirements for people wanting to hold events on their streets should be expanded on and made more explicit.
- 26 The DCC recommends that the guidance clearly links with the new guide for traffic management, and clearly communicates how RCAs would manage a different approach for community streets events and who is liable for the event closures.
- 27 The DCC suggests that the guidance also considers the needs of mobility impaired users and service vehicles – e.g. rubbish collection, gas delivery when approving community streets closures.

### ***Proposal Five: Closing roads for other functions and events***

- 28 The DCC supports the proposal that there should not be a specific limit for how often a road can be closed for regular events.
- 29 The DCC suggests splitting the legislation into subcategories, for example if it's an external 'for profit' type of event (bars/restaurants wanting to close the Octagon or a ticketed event), applicants should engage in a notified process. However, if it is a public/community/not-for-profit event (fun run, or public New Year's Eve event) then it may require a different process to ensure community events are well supported.
- 30 The DCC recommends reviewing the approval process for road closures as part of this consultation. The Local Government Act 1974 Schedule 10 paragraph 12 should be updated to remove "(except paragraph (e))" that currently requires the closing of a road for an event to go to a full council meeting for approval. To allow for shorter notice events such as Play Streets, events should be approved under delegation unless there are objections or based on a pre-approved threshold.
- 31 The DCC agrees with the proposal to update notification requirements to make it more flexible for the methods RCAs can use to notify the public. Many households do not receive a newspaper nor use it as their primary source of public information. Alternatives should be available to the RCA to notify more people.

### ***Proposal Six: Pedestrian Malls***

- 32 The DCC is supportive of the proposal to make the consultation and appeals processes more consistent with other types of street changes.
- 33 The DCC is supportive on being enabled to undertake these changes however would suggest that pre-implementation consultation will be imperative to ensure commercial activity remains supported in these types of changes.
- 34 The current process works but is onerous. The new proposal should be specific about the consideration that needs to be given to how disadvantaged people move around and that engagement will be important to meet their specific needs.
- 35 The DCC supports the proposal to shift the powers and requirements for pedestrian malls into the new rule. This will make it clear how any RCA consults and implements any proposed street changes.

### ***Proposal Seven: Transport shelters***

- 36 The DCC agrees with the proposal to remove the prescriptive consultation requirements and suggests that the guidance could be more specific in advising that the Public Transport authority should be responsible for consulting on bus shelters. This will ensure that the proposed changes are linked into the wider public transport network.

### ***General feedback***

- 37 The DCC believes that the proposed changes will help the DCC meet the city's zero carbon goals by enabling greater choice of modes for people to get around.
- 38 The DCC would like to see more support from Waka Kotahi in helping explain to the community reasons for the proposed changes and what the intended benefits are.
- 39 The proposed rule changes are enabling, not prescriptive and therefore the DCC Significance and Engagement Policy still applies.
- 40 Across all the street changes there will need to be a method of RCAs comparing outcomes and changes with one another, sharing what went well, what didn't and any changes as a result.

Nāku noa, nā



Aaron Hawkins

**MAYOR OF DUNEDIN**