



7 October, 2022

NZ Automobile Association submission on:

Reshaping Streets regulatory changes consultation document



SUBMISSION TO:

Waka Kotahi

REGARDING:

Reshaping Streets

DATE:

7 October 2022

ATTENTION:

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Executive Summary

The New Zealand Automobile Association (NZAA or AA) welcomes the opportunity to provide comment on the Reshaping Streets regulatory changes consultation document. The AA would also like to express its appreciation for the extension granted for this submission which allowed it to undertake meaningful engagement with its district councils and the survey of AA Members, which forms part of the response.

The consultation document is structured around seven proposals - regulatory changes that will allow road controlling authorities to:

1. Pilot street changes
2. Filter and restrict traffic
3. Implement school streets
4. Implement community streets
5. Closing roads for other functions and events
6. Establish pedestrian malls
7. Erect transport shelters

The New Zealand Automobile Association considers many of the suggestions outlined in Reshaping Streets to be pragmatic, however there are several proposals where we have significant concerns, and we cannot support them in their current form.

It is appreciated that the Government and Waka Kotahi desire to introduce changes that will encourage active and public transport, make roads safer, lower emissions and foster more liveable urban areas, but the AA has significant concerns around the degree of power that would be given to road controlling authorities to act without an appropriate public mandate and the lack of clarity around some of the proposals.

The AA considers that some of the proposals could in extreme cases have an effect of eroding utility and amenity of roadways for many of its 1.8 million members and the public at large, without giving them the right to provide appropriate comment.

On this basis the AA's position is that proposals 1, 2 and 3 in the Reshaping Streets consultation document need to be reconsidered.

The AA would welcome the opportunity to meet with Waka Kotahi and discuss the issues that we raise in our submission.

1. Piloting street changes

1.1 Prior consultation to avoid confusion

The AA believes consultation in some form needs to take place ahead of physical changes to roads, particularly if the proposed modifications fundamentally change the way people interact with the road for a prolonged period. The AA believes sharing written plans are a good method of accurately

communicating changes before physical modifications are made and decreases the likelihood of confusion and unnecessary distress to street users.

The majority of 3282 AA members recently surveyed were supportive of physical street trials either wholly or in part. A total of 57.1% of respondents said they either supported or strongly supported trials, while 28% had mixed views on them. Most thought a trial period between one and six months was the most sensible length of time. Just 1.5% of respondents thought trails of a year or more would be suitable.

However, our Member survey was also very clear on the need for written consultation prior to a trial - 78.5% of 3307 AA members that responded to a question asking how they felt about changes being made to streets without prior consultation either opposed or strongly opposed the notion.

In the same survey, 84.4% of 3753 respondents had mixed or negative views of their local council's public consultation efforts when looking to make street changes. 67.6% felt the projects being consulted on were a fait accompli before engagement began, and 60.6% thought the majority of affected people were unaware of proposed projects while consultation took place.

The AA believes removing the need for consultation before making physical changes would be unlikely to improve satisfaction, and that it would be more productive to enhance the consultation frameworks so they are more efficient and informative, and to look for opportunities where pilots could be incorporated in an improved system.

1.2 Notice period

Several of the AA's 18 district councils noted that a minimum notice period of two weeks ahead of works to make physical changes was not long enough – they were particularly concerned with the need to alert emergency services to layout changes that could affect their ability to access incidents.

2. Filtering traffic types

2.1 Consultation

As with the previous proposal, the AA believes consultation is necessary before any fundamental changes are made to streetscapes.

The AA does not support the granting of new powers to alter roads without consultation – consultation, particularly in written form, helps affected parties understand an authority's reasoning and ambitions while giving community members time to share their views.

In addition to this, the AA believes impact reports need to be produced ahead of any road layout changes to gauge the effects proposed modifications will have on surrounding streets and infrastructure.

2.2 Defining traffic controlling devices

The AA does not agree with the proposal to allow RCAs to use “any physical object” as a traffic controlling device (TDC). The association would like to see Waka Kotahi set clear standards to ensure TDCs are fit for purpose, and will not only be safe, but not detract amenity from a street.

3. School streets

3.1 More information required

The AA endorses safer traffic environments around schools, however the consultation paper has not provided enough information for the association to understand the implications of the suggested changes.

The paper lacks detail on the timeframes for restrictions and the physical extent of school street zones.

It is also unclear what considerations have been or would be made for the surrounding area that will inevitably absorb parking and traffic pressure. The AA has seen little evidence to suggest restricted school streets would significantly modify the behaviour of parents and caregivers currently using cars at school drop-off and pick-up times, meaning a restriction may simply shift congestion from outside the school to other nearby areas.

The AA would also like to see more information on how through traffic that would otherwise be using the road would be managed and the considerations for residents and neighbours who would need access to their homes and premises.

4. Proposals 4 to 7

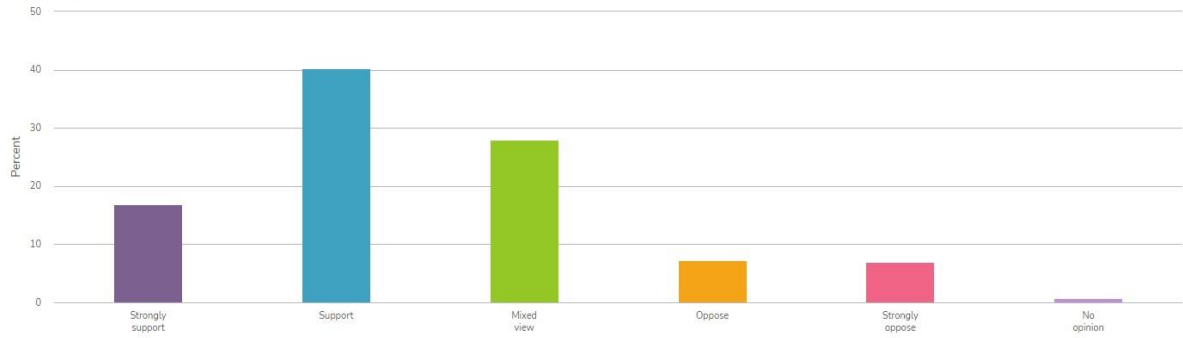
The AA sees the proposals made regarding Play Streets, public events, pedestrian malls and public transport shelters to be largely pragmatic and is relatively comfortable with the suggestions.

A point that was raised by several of the AA's district councils concerned the removal of the ability for people to appeal the establishment of pedestrian malls in the Environment Court – they felt removing this source of legal recourse was heavy-handed.

5. Survey Results

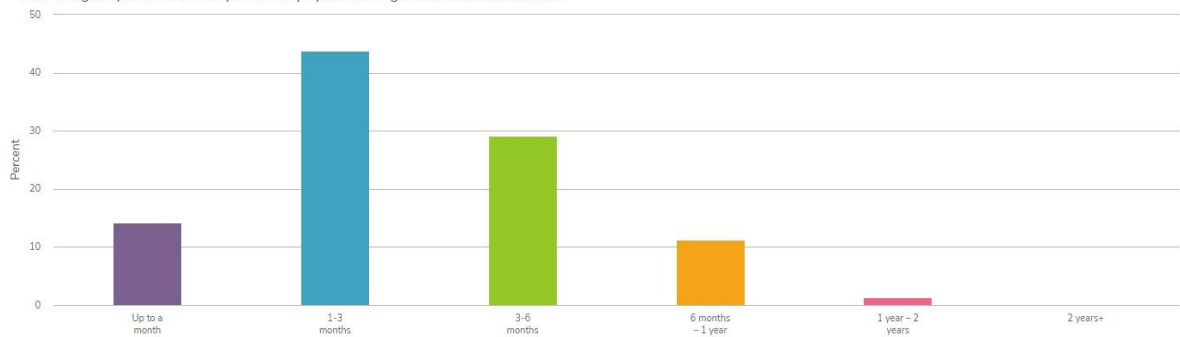
The graphs in this section references the figures cited in previous sections of this submission. The AA carried out the survey in October 2022. Over 3500 AA members responded to the survey, and we therefore have a very high degree of confidence in the results.

How would you feel about changes being trialed physically on a street so that people can experience them first then give feedback to authorities about what they think of the changes?



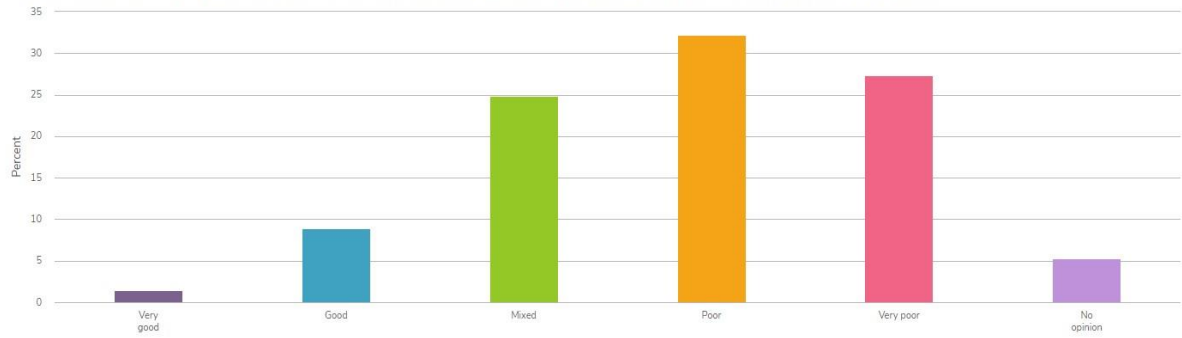
Value	Percent	Responses
Strongly support	16.9%	556
Support	40.2%	1,318
Mixed view	28.0%	920
Oppose	7.2%	236
Strongly oppose	7.0%	230
No opinion	0.7%	22
		Totals: 3,282

How long do you think a trial period for physical changes to a street should be?



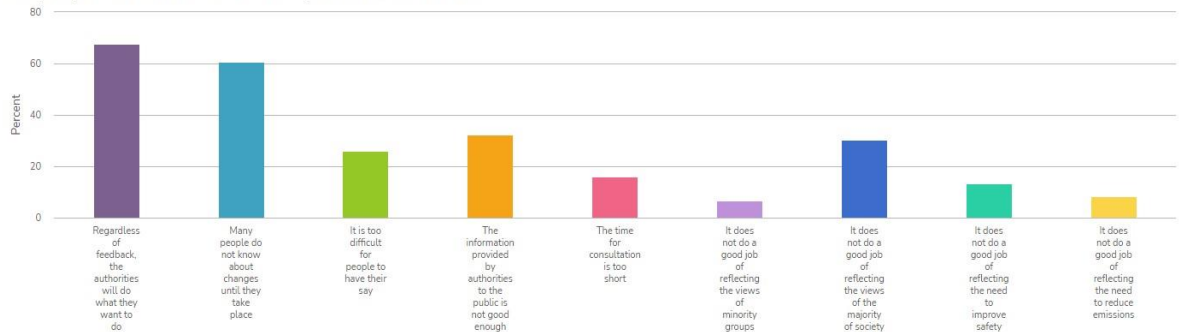
Value	Percent	Responses
Up to a month	14.2%	391
1-3 months	43.8%	1,211
3-6 months	29.2%	808
6 months - 1 year	11.3%	312
1 year - 2 years	1.3%	35
2 years+	0.2%	6
		Totals: 2,763

How do you feel the current process for public consultation works when councils are looking to make changes to streets and transport?



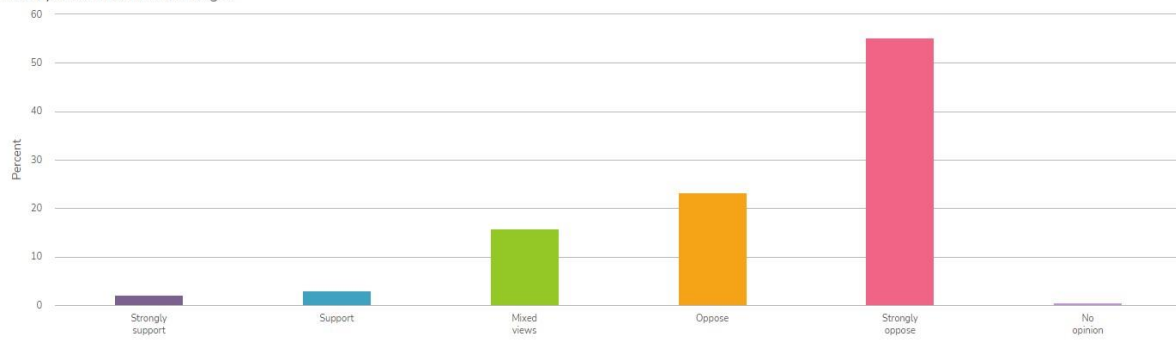
Value	Percent	Responses
Very good	1.5%	56
Good	8.9%	333
Mixed	24.9%	933
Poor	32.2%	1,210
Very poor	27.3%	1,023
No opinion	5.3%	198
		Totals: 3,753

Why do you think the current consultation process does not work well?



Value	Percent	Responses
Regardless of feedback, the authorities will do what they want to do	67.6%	2,136
Many people do not know about changes until they take place	60.6%	1,913
It is too difficult for people to have their say	25.9%	819
The information provided by authorities to the public is not good enough	32.4%	1,025
The time for consultation is too short	16.0%	505
It does not do a good job of reflecting the views of minority groups	6.7%	211
It does not do a good job of reflecting the views of the majority of society	30.4%	961
It does not do a good job of reflecting the need to improve safety	13.2%	417
It does not do a good job of reflecting the need to reduce emissions	8.3%	261

A change currently being considered by the Government would allow councils to make changes to streets without having to undertake public consultation first. How would you feel about this change?



Value	Percent	Responses
Strongly support	2.1%	70
Support	3.1%	101
Mixed views	15.8%	524
Oppose	23.3%	772
Strongly oppose	55.2%	1,824
No opinion	0.5%	16

Totals: 3,307

About the New Zealand Automobile Association

The NZAA is an incorporated society with over 1.8 million members, representing a large proportion of New Zealand road users. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.

Across New Zealand, the motoring public regularly come into contact with the AA through our breakdown officers, 37 AA Centres and other AA businesses. Eighteen volunteer AA District Councils around New Zealand meet each month to discuss local transport issues. Based in Wellington and Auckland our professional policy and research team regularly surveys our members on transport issues and members frequently contact us unsolicited to share their views. Via the AA Research Foundation, we commission original research into current issues in transport and mobility. Collectively, these networks, combined with our professional resource, help to guide our advocacy work and enable the NZAA to develop a comprehensive view on mobility issues.

Motorists pay over \$4 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. Much of this money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, and Police enforcement activity. On behalf of AA members, we advocate for sound and transparent use of this money in ways that improve transport networks, enhance safety and keep costs fair and reasonable.

Our advocacy takes the form of meetings with local and central government politicians and officials, publication of research and policy papers, contributing to media on topical issues, and submissions to select committees and local government hearings.

Total Membership

1.8+ million members

Just over 1 million are personal members

0.7 million are business-based memberships

% of licenced drivers

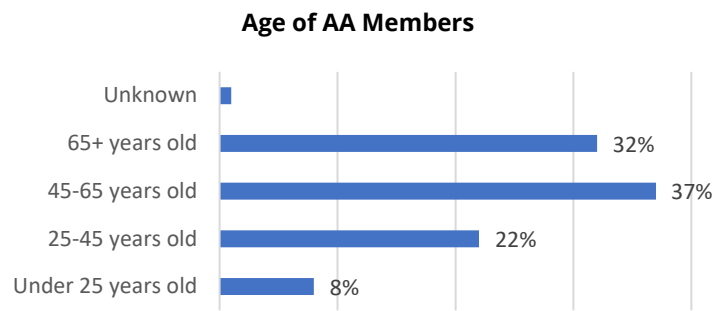
Around 29% of licensed drivers are AA Members

Gender split

54% Female

46% Male

Age range & Membership retention



Half of AA Members have been with us for 10 years or more.
