

1-Are the requirements in the proposed regulatory framework appropriate? Are there any requirements that should be removed, included or modified? Please provide a rationale to support your position

PMD definition oversight "when propelled only by the motor, cannot reach a speed greater than 25 km/h on level ground".

PMD's should not be speed limited by design/power output. This restriction effectively excludes most common PMDs (including those used as examples of PMDs in the discussion paper), severely limiting options when it comes to new buyers and forcing existing owners to purchase new compliant devices in order to be legal.

Power output limiting in particular, is a serious detriment to functionality, as it affects a PMD's ability to climb hills and carry heavier riders. It also limits use off road on private property.

Adhering to speed limits should be up to the user to control, in the same way all other road going vehicles are not speed limited (with the exception of some trucks).

This would could very likely result in insurance issues, as someone would likely assume their PMD is covered, despite most PMDs actually not being permitted under this restriction.

However, this speed restriction does make sense for hire service PMDs, as users may be unaware of the dangers and/or have less experience riding a PMD.

2-Is 60 kg a suitable maximum weight for a PMD? If not, what is a more suitable weight and what other factors should be considered? Please provide a rationale to support your position.

I have no objection to this maximum weight limit, the vast majority of PMDs are far below this weight (most PMDs are under 20 kg).

3-Should children under the age of 16 years old continue to be permitted to use a motorised scooter incapable of travelling more than 10 km/h on level ground on roads and paths? Or should they be able to use any device that complies with the proposed PMD framework? (see Appendix A). Please provide a rationale to support your position

Under parental supervision, children should be able to use PMDs that can travel up to 10 km/h

4-Do you agree with the criteria selected to assess the options? Are there any key impacts not covered by these criteria?

The criteria seem appropriate

5-When considering the safety risk assessment, access and amenity impacts, broader economic impacts, as well as compliance and enforcement impacts; has the impact analysis sufficiently considered all relevant variables and available evidence? What other factors could be included in the analysis? Please provide any additional evidence. (See Appendix E - Impact Analysis)

Yes, the impact analysis seems to sufficiently consider all relevant variables.

6-What do you believe is the most appropriate road infrastructure for PMDs to access: footpaths, separated paths, bicycle paths and/or roads? Please provide a rationale to support your position

I believe the following are contextually appropriate infrastructure for PMDs

- Footpaths: Staying under 10 km/h, there is little risk to pedestrians or riders. Footpaths are very important to the feasibility of PMDs as first and last-mile transport.
- Bicycle paths: 25 km/h limit, slow to 10 km/h around pedestrians (similar to the slow to 40 law for emergency vehicles)
- Separated paths: Ideal as to not use the road or footpath. **Should not be limited to 25 km/h**, in this context PMDs should match bicycle speed limits. Although PMD users are expected to ride to the conditions in the same way a cyclist would.
- Roads (up to 50 km/h limit): PMD user should be able to travel up to the speed limit of the road, in order to close the speed differential between PMD user and other vehicles. If there is a bike path available, it should be used.
- Roads (60 km/h limit): Only when a bike lane is available, PMD should be permitted to travel up to the speed limit if capable, in order to reduce speed differential.
- Roads over 60 km/h limit: not suitable for PMDs

7-What is an appropriate and safe maximum speed that PMDs should be permitted to travel across the various infrastructure: (a) pedestrian areas, (b) bicycle areas, and (c) roads? Please provide a rationale to support your position

- Footpaths: Staying under 10 km/h, there is little risk to pedestrians or riders. Footpaths are very important to the feasibility of PMDs as first and last-mile transport.
- Bicycle paths: 25 km/h limit, slow to 10 km/h around pedestrians (similar to the slow to 40 law for emergency vehicles)
- Separated paths: Ideal as to not use the road or footpath. **Should not be limited to 25 km/h**, in this context PMDs should match bicycle speed limits. Although PMD users are expected to ride to the conditions in the same way a cyclist would.
- Roads (up to 50 km/h limit): PMD user should be able to travel up to the speed limit of the road, in order to close the speed differential between PMD user and other vehicles. If there is a bike path available, it should be used.
- Roads (60 km/h limit): Only when a bike lane is available, PMD should be permitted to travel up to the speed limit if capable, in order to reduce speed differential.
- Roads over 60 km/h limit: not suitable for PMDs

8-Do you agree with the overall assessment that Option 3, Speed Approach 1 is the option that best balances mobility and safety? If not, which option and speed approach do you prefer? Please provide a rationale to support your position

Yes, I agree Option 3, Speed Approach 1 is the ideal option, although consideration should be made to permit PMD users to exceed 25 km/h on local roads, to decrease the speed differential between PMD and other vehicles.

Personal Comment:

Personally I find driving extremely stressful, and public transport claustrophobic and stressful; or it simply can't take me where I need to go. PMDs are a fantastic alternative to both of these issues, and have an advantage of being able to go further than you may be physically capable of riding on a bicycle. PMDs still have physical health benefits, and just as importantly, have mental health benefits of not driving or catching public transport.