12 December 2019

Attn: Tim Davern

National Transport Commission

Level 3, 600 Bourke Street

MELBOURNE VIC 3000

Dear Mr Davern,

Please find my submission to the National Transport Commission's publication Barriers to the safe use of personal mobility devices - consultation RIS.

I am 60 years old and use my Onewheel Pint for recreation and commuting in NSW. In part this is my response to climate change and I look forward to having a legal framework to continue to benefit from efficient transportation on my PMD.

The NTC has made excellent progress made on the framework for PMDs and I support the preferred two speed direction established (Option 3, Speed Approach 1) as a workable way forward.

We must legalise PMDs now so that our investments in future infrastructure will favour pedestrian and PMD travel versus losing significant parts of our cities to roads and traditional motor vehicles. Civic amenity is materially improved from such infrastructure as evidenced by the popularity of the High-Line in cities such as New York and Paris. To this extent the adoption of PMD’s will increase the number of paths safely available for pedestrians and there are many excellent examples of Shared paths used by PMDs, pedestrians and bicycles today, such as the Cooks River in Sydney.

**Question 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.”**

I believe that the proposed PMD definition is not workable. It says "when propelled only by the motor, cannot reach a speed greater than 25km/h on level ground". In the case of one wheeled vehicles the additional ‘potential speed’ is necessary to ensure that it will balance the rider safely at the current speed. In any case the definition of a 25km/h speed limit for a vehicle is irrelevant to safety in proximity to pedestrians where the rider should go at a maximum of 10km/h.

Instead the speed limits should be related to the context and not device definition. Similarly Motorcycles, motor vehicles and bicycles are not defined by a top capable speed yet they can travel at speeds that well exceed national speed limits.

While I believe a defined capable speed limit is not necessary for privately owned PMDs, there is a well established case for-hire PMDs should be speed-limited to 15-20km/hr due to casual hire rider's lack of awareness of PMD-specific road rules. Auckland has recently had to introduce more restrictive speeds around the CBD as the hiring riders are not as aware of the rules as owners of PMDs. This distinction avoids penalising responsible PMD users due to a cohort that is perceived as irresponsible or dangerous by the general public.

**Question 2: “Is 60kg 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.”**

Most PMDs are under half of this weight limit.

My Onewheel Pint is under 11kg with a carry handle.

Benefits include an ability to can carry it in any areas of pedestrian congestion and to compliment public transport. In a crowded Sydney train I can stand with myself and the board occupying no more space than a person with a shopping bag. For instance, a journey that I regularly take allows a train ride + 3.5km PMD ride to replace driving 47km each way in my Car.

**3: “Should children under the age of 16 years old continue to be permitted to use a motorised scooter incapable of travelling more than 10km/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.”**

Yes children aged 6 years or older should be allowed the use of PMDs on non-road contexts if supervised by a responsible adult and the PMD does not travel faster than 10km/hr. Appropriate protection (helmet, wrist & knee guards) are recommended.

Children are introduced to bicycles and similarly PMD usage skills should be taught at an early age to ready children for this soon-to-be common form of personal transport.

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

At surface level the assessment framework seems sound.

My PMD delivers reduced environmental impact, improved mental health and can complement public transport for longer Journeys as described in 2 above.

**Question 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)**

Risk impact differentiation based on privately owned vs hired PMD use.

The two groups demonstrate different levels of knowledge of road rules, safety factors, barriers to entry/participation and general regard for the condition of PMDs. The outcome of such an analysis would likely be:

Differentiation in risk mitigation (such as speed limiting hired PMDs to 15-20 km/hr and not imposing device-level speed limits on privately owned PMDs).

**Question 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.**

Footpaths. With PMD operation of 10 km/hr there is little evidence of significant risk to pedestrians and riders. Footpaths allow PMD riders convenient, safe, and efficient access to their workplaces, shops, cafes, recreation venues, etc where roads may be unsafe to do so.

Bicycle paths, Perfect for the operation of PMDs

Shared Paths and Separated paths, Perfect for the operation of PMDs (with speed limit of 10km/hr around pedestrians and top speed of 25km/hr when not around pedestrians).

Roads - up to 40km/hr limit This context is appropriate for privately owned PMD use.

However Speed-limited (15-20km/hr) PMDs operated by tourists and visitors unfamiliar with traffic conditions may be hazardous in this or faster contexts.

Roads - 50km/hr limit PMD users should stay left and allow motor vehicles to pass out of courtesy (as bicycle riders usually do).

Roads - 60km/hr limit – PMD use Only if a Bike Lane is present

Roads - over 60km/hr limit -Not appropriate due to PMD speed differential of other road users

**Question 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.**

1. Footpaths 10 km/hr - little evidence of significant risk to pedestrians and PMD riders.

Shared paths -perfect for the operation of PMDs (with speed limit of 10km/hr around pedestrians and top speed of 25km/hr when not around pedestrians).

1. Bicycle paths 25km/hr
2. Roads 40km/hr, 50 Km/hr – 25km/hr (alternately bicycle rules apply where the PMD can exceed this.)
3. Roads 60 Km/hr where there is a bike lane only - 25km/hr (alternately bicycle rules apply where the PMD can exceed this)

**Question 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**

I agree that given the assessment framework and options presented Option 3, Speed Approach 1 best balances mobility and safety.

This approach has the advantage of being straightforward to remember by the motoring and pedestrian public and enforce and represents a workable compromise between safety and mobility.

Jeff Fry