

Dear Ms Mees and Mr Peppi

Thank you for inviting us to submit our concerns about E-Scooters and “rideables” generally.

We believe that E-scooters and rideables (Innovative Vehicles) on footpaths and shared paths are the greatest threat to walking, our general health and the safety of pedestrians and amenity and the sovereignty of the footpath, since footpaths were invented.

WE ARE A RAPIDLY AGEING POPULATION AND FALLS ARE THE GREATEST CAUSE OF AVOIDABLE DEATHS AFTER FIFTY (YEARS OF AGE)

The Australian Road Toll until end 2018 was as follows:

2. Deaths by road user, age-group and gender

Table 2.1 By road user						
12 months ended December	<i>Driver</i>	<i>Passenger</i>	<i>Pedestrian</i>	<i>Motorcyclist^b</i>	<i>Pedal^b cyclist</i>	<i>Total^c</i>
2014	533	228	151	191	45	1,151
2015	555	251	162	203	31	1,205
2016	623	208	182	249	29	1,293
2017	569	234	161	211	39	1,224
2018	535	205	176	190	35	1,146
Latest per cent change	-6.0	-12.4	9.3	-10.0	-10.3	-6.4
Average trend change per year (per cent)	0.3	-2.8	3.0	0.3	-2.7	0.1

These data show that Pedestrians not only experienced the greatest increase of all Road Users in 2018, they also experienced the greatest average increase over the past 3 years.

The introduction of these new E-scooters and rideables, especially on the footpath and shared paths, can only serve to increase the deaths and serious injuries of pedestrians.

Serious injuries emulate these trends.

1 The new Queensland Regulations/Rules are attached.

2 The PCA as a key stakeholder was given 48 hours to comment on them.

3 SMH article of 20 Jan 2019, attached re first two months of operation in Queensland (quote):

Early data showed emergency services responded to about 60 scooter-related incidents since November.

Unconfirmed reports suggest that that injuries are far greater.

For example, there were 285 public insurance claims for injuries caused by electric scooters since US-based Lime E Scooters launched in Auckland and Christchurch in October and November 2019.

The Brisbane City Council has now given Lime 2 weeks to show cause why they should not be banned:

<https://www.couriermail.com.au/news/queensland/brisbane-city-council-threatens-to-kick-lime-scooters-out-of-city/news-story/d3ffe1e83ffe6e573e7db59408e786a>

4 Qld is now (to our knowledge) the only place in the world where a 16 year old can ride a Segway (or other rideable) weighing up to 60 kgs at up to 25 km/h on any footpath (unless otherwise signposted). These vehicles are lethal. The owner of Segway was killed when he rode his over a cliff: <https://www.bbc.com/news/uk-england-14167868>

But it gets worse: the Rules (attached) allow a 12 year old to ride rideable WITH ADULT SUPERVISION

Rules for rideables

For everyone's safety, ride in a safe and respectful manner, especially around pedestrians. Rideables don't need to be registered.

For your safety, **you must:**

- be at least 16 years of age, or 12 with adult supervision

[s://www.qld.gov.au/transport/safety/rules/wheeled-devices/personal-mobility-devices](https://www.qld.gov.au/transport/safety/rules/wheeled-devices/personal-mobility-devices)

03/2019

Rules for personal mobility devices | Transport and motoring | Queensland Government

- wear an approved bicycle helmet, that is securely fitted, at all times (unless an exemption has been granted for medical or religious reasons)

In Queensland, this is now legal for a 12 year old child, with no training and no risk assessment.

Of course no-one in the Qld Department of Transport has even indicated how an adult can supervise a 12 year old riding a 60 kg Segway (or mono Segway/rideable) while the child is doing 25 km/h along any footpath in Queensland (unless otherwise signposted)

And of course who pays for the head/brain injury claims of those who don't wear helmets for so-called "religious reasons"?

Here's the latest Segway Mini Pro – you steer and brake with your knees: watch the video to see how safe they are:

<https://youtu.be/jQQFlta6XxA>



And imagine being hit by one of these at 25 km/h.



And what about the monocycle – how do you stop these at 25 km/h?



This is how our footpaths will look in the future if we do not fight this invasion.

8 What the E-scooter companies don't tell you is that "riders" simply leave them anywhere on the footpath when they reach their destination. It's utter nonsense that they are collected in the meantime. They then blow over onto the footpath or road when there is the slightest breeze, causing very dangerous obstructions for pedestrians especially at night (and especially for people with vision impairment) and motorists and cyclists on the road:



9 In response to a proposed E-Scooter trial – Victoria Walks, Vision Australia and COTA raised serious concerns with the Victoria Government (see letter to MPs attached).

10 We are rapidly becoming one of the fattest nations in the world. Sedentary behaviour which is a primary cause of obesity costs Australia billions of dollars per annum. Regular walking is by far the best exercise for most Australians. E-Scooters (rideables) will not only create an unsafe and hostile footpath environment, they will discourage walking (active transport) and encourage the use of “rideables” (inactive transport). In a paper regarding Shared Paths, released by Victoria Walks, they found:

In a survey of 607 Victorians with vision impairment, as pedestrians 8% had been involved in a collision and 20% in a near collision over the previous five years. A quarter of these collisions (or near collisions) were with bicycles. Dr Jan Garrard’s 2013 report Senior Victorians and walking: obstacles and opportunities demonstrates that walking is critical for senior Victorians to live healthy, independent lives. For those aged 75 and over, walking makes up 77% of their total physical activity. And as seniors get older, their walking is more about everyday needs, with walking for shopping or personal business increasing from 53% of trips for 60-69 year olds to 81% of trips for those aged over 80. The study included a survey of 1128 senior Victorians – 39% rated bicycle riders on

shared walking or cycling paths as a moderate to major constraint to their walking. Cyclists on footpaths will deter seniors from walking and limit their ability to live their everyday lives.

"Cyclists are really bad...and I ride a bike myself, but they scare me... Bicycle Victoria says 'obey the road rules' but they don't."
Senior Victorian.³

Time Magazine <http://time.com/5521308/electric-scooter-safety/> reported on 5 February 2019 (quote): ... ***But city leaders and citizens, in Austin (USA) and nationwide, are worried about injuries for both users and pedestrians.***

"We're totally paranoid," said Forrest Preece, a retired advertising executive who lives in a downtown condo and leads a largely pedestrian life. "I'm 72 and my wife is 70. It would be easy to knock us over," he said. "My wife actually went online and found a little mirror to attach to her wrist to look behind her so she's not constantly turning around. We go single file so she can see that mirror and see what's behind us."

There are those who seem to believe that E-Scooters and rideables will reduce car trips. That maybe. But it will have a far greater effect on walking. Not only will people use these vehicles to replace walking, but they will render the amenity of the footpath so hostile and uninviting, that people, especially the elderly and young children, who need safe footpaths for their regular exercise – will stop walking altogether – especially as stated: the highest cause of avoidable death after 50 is from a fall.

10 Apart from the pathetic penalties, Police rarely enforce the cycling laws, so why would they enforce the "rideables" laws. In many states they no longer even attend road crashes unless someone is killed or seriously injured, so clearly, they do not have the time, resources or inclination to enforce these laws. In Manly (in NSW) the police stopped enforcing the bicycle laws years ago, with over two thirds of cyclists now failing to wear helmets (proving the ancient axiom: Non enforcement of the law will encourage its disobedience). This was confirmed in the Manly Daily but in spite of this very negative publicity:

<https://www.dailytelegraph.com.au/newslocal/northern-beaches/manly-cyclists-disobey-tough-new-bike-laws-a-day-after-theyre-enforced/news-story/a6b1e0ff52607c6e3e0e6bdf137e35a9>

and a \$330 (NSW) penalty for not wearing a helmet, enforcement is very rare. So why on earth would the NSW Government be proposing the E-Scooter trial in Manly?

11 **The speed limit on a Shared Path is the same as the adjacent road.** In most jurisdictions there are no On-The-Spot penalties for speeding on a bicycle. Police have to take an offender to court if they are speeding on a footpath, which in some cases can be legally as high as 80 km/h. The speed limit on this Shared Path in Sydney, the most highly used Shared Path in NSW on the access to the Harbour Bridge is 70 km/h. Children have to walk on this footpath to get to the Fort Street Primary School.



On the footpath adjacent to the Bradfield Highway, where schoolchildren as young as 5 are required to walk to school, lycra clad cyclists speed at over 30 km/h, ignoring the solar powered sign installed by the City of Sydney which is triggered when a cyclist exceeds 15 km/h. During our survey, all cyclists heading south triggered the sign ... None slowed down

These are some of the current relevant rules, definitions and penalties for cyclists and e-cyclists in NSW (E-Scooters are currently not permitted on NSW roads or road related areas, but a trial has been proposed by TfNSW).

Road Rule for power Assisted pedal cycle

- The definition of a bicycle includes a power-assisted pedal cycle (a pedal cycle to which is attached one or more auxiliary propulsion motors having a combined maximum power output not exceeding 200 watts). A power-assisted pedal cycle includes pedalecs within the meaning of the Vehicle Standard (Australian Design Rule—Definitions and Vehicle Categories) 2005 (which may have one or more auxiliary propulsion motors generating a combined power output not exceeding 250 watts).
- Power-assisted pedal cycles that meet either of the criteria described above do not require registration in NSW as they are defined as bicycle.
- All rules that apply to riders of bicycles also apply to riders of power-assisted pedal cycles.

Rule for riding a bicycle on a shared path

- When riding on a shared path, a bicycle rider must keep to the left of the shared path unless it is impracticable to do so, and give way to any pedestrian on the shared path. (give way means the rider must slow down and, if necessary, stop to avoid a collision)
- The penalty for failing to comply with this rule is \$112.

Penalty for exceeding the speed limit on a bicycle

- The fine for bicycle riders who exceed the speed limit is \$112.

Current penalty for no helmet

- The penalty for a bicycle rider (or passenger) who does not wear an approved bicycle helmet fitted and fastened to their head is \$337.

Penalty for injuring a pedestrian in a crash with a bicycle on a shared path where the pedestrian is injured.

- If a bicycle rider has a crash with a pedestrian on a shared path, they could potentially be issued with infringements for failing to give way to a pedestrian on a shared path (\$112) and/or riding negligently, furiously, recklessly (\$448).

As you can see, the penalties are skewed to protect the rider where the penalty for not wearing a helmet is three times greater than if a rider "has a crash with a pedestrian on a shared path". On a Shared Path, a pedestrian has absolute right of way so it follows that the rider must be at fault.

12 Slater and Gordon provided expert legal advice regarding Shared Paths in 2008:

<http://www.walk.com.au/pedestriancouncil/page.asp?PageID=3125&SiteID=1>

They concluded:

I am therefore of the opinion that local government road authorities may be found to be in breach of duty of care for failing to impose safe speed limits for bicyclists on Shared Bicycle Paths although any such finding of breach of duty of care must necessarily depend upon the particular facts of the case before the Court.

There are very few if any Shared Paths (or footpaths) in Australia where there are any enforceable Speed Limits for cyclists. One such place is the Pyrmont Bridge in Sydney. In an article published in The Telegraph entitled: Arrogant Rude and Dangerous it was reported:

The SHFA audit was taken during the morning and afternoon peak over five days, with the lowest average speed over the period at 23km/h and the highest average speed 27km/h.

Civil liability barrister James Sheller said pedestrians who are injured by cyclists would find it difficult to claim for physical damage because there is no compulsory insurance scheme for cyclists.

It is irrefutably clear that cyclists and scooterists in general do not obey the road rules, primarily because there's little or no enforcement (Council Rangers cannot enforce the cycling or rideables laws ... only the police) and the penalties are farcical

13 In the Slater and Gordon advice they reported the tragic case of Mrs Maria Guiliano:

<http://www.walk.com.au/pedestriancouncil/page.asp?PageID=3125&SiteID=1>

The lack of regulation for Shared Bicycle Paths will necessitate recourse to general transport engineering principles by Courts in assessing whether a roads authority is in breach of duty of care in relation to the planning, design and construction of Shared Bicycle Paths.

This was evident from a civil claim brought by Maria Guiliano against Leichhardt Municipal Council and the RTA as a result of being struck by a bicyclist in a Shared Bicycle Path on Iron Cove Bridge on 7 March 2002. Maria had been walking with her husband, John Zalugna, on the "Bay Run" Shared Bicycle Path from Five Dock and had climbed the pedestrian stairway below the eastern end of the Iron Cover Bridge in order to join the Shared Bicycle Path on the northern side of the bridge. There were no warning signs on the pedestrian stairway at the time that would operate to warn her that she would join a Shared Bicycle Path at the top of the bridge. The point of merger between the top landing of the pedestrian stairway and the Shared Bicycle Path was obscured to bicyclists travelling in an easterly direction by a concrete abutment that formed part of a concrete wall that ran along the northern side of the bridge. Bicyclists travelling in an easterly direction would not have been able to sight pedestrians joining the Shared Bicycle Path from the top landing of the pedestrian stairway until the pedestrian walked from behind the abutment onto the path.

A bicyclist travelling in an easterly direction along the northern Shared Bicycle Path of the Iron Cove Bridge struck Maria Guiliano at a speed of approximately 20 km per hour immediately after she stepped from behind the abutment onto the Shared Bicycle Path resulting in a severe traumatic head and brain injury.

It is also clear from the data now emerging from overseas that most of the serious injuries being sustained from E-scooters are head injuries. In Queensland (and now proposed in NSW) helmets are compulsory for all cyclists and E-Scooter riders. If the authorities have deemed this to be required to protect the riders, why have they not required that pedestrians also be required to wear them (as in the Guiliano case where she was permanently brain damaged yet the cyclist, who was wearing a helmet, rode off, never to be seen again)

14 The Austroads Guidelines state that on a Shared Path the maximum speed should be 15 km/h, the minimum width 2.5 metres and if the number of users (cyclists and pedestrians) exceeds 20 per hour, it should be a separated and dedicated path. In 2003, in response to a suggestion that Shared Zones have a maximum speed limit of 20 km/h, Mr Paul Forward, then CE of the RTA was unequivocal in his opposition to such an idea. He provided a scientific reason for requiring that the maximum speed in a Shared Zone for ALL vehicles be 10 km/h:

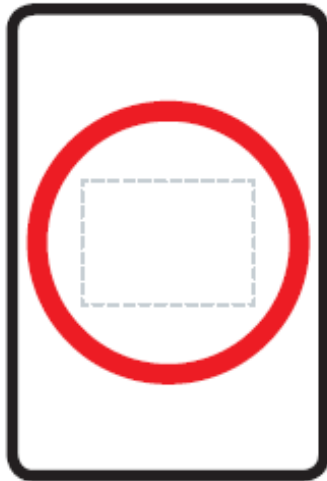
As stated in previous correspondence, as vehicle speeds increase, the risk of serious injury or death to pedestrians involved in a collision with vehicles increases. In order to minimise the risk to pedestrians in Shared Zones, the RTA has mandated that a speed limit of 10 km/h will apply. This speed closely represents the walking speed of pedestrians (85th percentile speed of 4.3 km/h) in contrast to a speed limit of 20 km/h. A speed limit of 20 km/h in a Shared Zone would introduce a difference five times in magnitude in 85th percentile speed between vehicles and pedestrians.

Once again, I appreciate your comments on vehicle speedometers. However, in the interest of pedestrian safety and amenity, the RTA does not support the introduction of speed limits higher than 10 km/h for Shared Zones.

For this very reason, Australia Post motor-bikes are governed to 10 km/h on ALL footpaths.

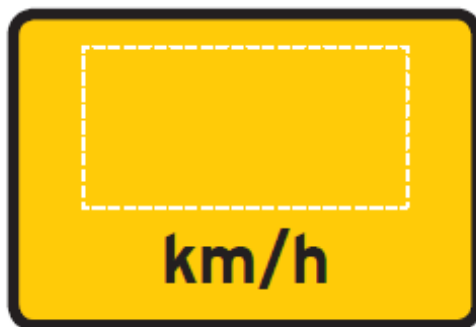
Enforceable Speed Limits in Australia are in steps of 10 km/h and must end in Zero. Speed limits ending in 5 km/h are Advisory Speed Limits.

FIGURE 2.1 REGULATORY SPEED LIMIT SIGN (R4-1)



All regulatory speed limits are in steps of 10 km/h, always ending in 0. All advisory speed limits are in steps of 10, always ending in 5.

FIGURE 2.2 ADVISORY SPEED LIMIT SIGN (G9-79)



It's therefore extraordinary and bewildering, that suddenly, because the Lime E-Scooters are governed to 25 km/h, that the Queensland Government has decided that this is an acceptable speed limit on all footpaths, without providing any reasons whatsoever for permitting such a high and potentially lethal speed limit.

Of course private E-Scooters and rideables are not governed and many are capable of speeds up to 50 km/h. The Queensland Government has not provided any information as to how the Police will enforce the law in such circumstances, and with what equipment, especially as most of these scooters are not equipped with speedometers and as stated before, the maximum speed for cyclists is the same as the adjacent road. Lime and other similar companies including Uber also have pedal assisted E-Bicycles which presumably will be allowed to travel at these speeds.



15 While Lime claim they will be able to identify all riders in the event of a crash (this is yet to be proven), there will be no such ability to identify the users of private rideables. In the Case of Mrs Guiliano, her husband was required to hire a full time carer for his permanently brain damaged wife – until he was able to successfully sue Leichhardt Council and the RTA. In the case of privately owned rideables, it will be virtually impossible to identify those responsible for causing injury to pedestrians as there are no number plates and no licensing or any other form of identification required. Nor are they required to have any form of insurance. There is therefore an incentive to ride away in the event of a crash. It's known by insurers as the "loss of house" event. The rider knows he/she could be sued for hundreds and thousands of dollars if there's brain or other serious injury and therefore it's commercially far wiser to ride off, leaving the victim to pay the costs.

16 Motorists should be very worried about rideables. At law, motorists must give way to all vehicles on a footpath (Qld) or Shared Path. If a scooterist is travelling at 25 km/h on a footpath it will be very difficult to see and/or avoid motorists exiting their driveways



Cyclist crashing into reversing vehicle on footpath

Just watch the video.

<https://youtu.be/wdIMmDAY9Aw>

If the cyclist in this video had been seriously injured or killed, the motorist would have been charged with dangerous driving causing grievous bodily harm/death.

That's because motorists are required to give way to cyclists (and E-Scooters) on ALL Shared Paths.

Even the Austroads Guidelines state that the maximum speed a cyclist should travel on a Shared Path is 15 km/h. With "rideables" travelling at 25 km/h motorists will find it very difficult to exit their driveways safely.

17 And what about the liability on Councils? The wheels on these scooters are very small (unlike a standard bicycle) so they are far more likely to have crashes if the paths are not maintained or uneven.

Cyclists in Victoria have successfully Councils for damages (and winning) because the Shared Paths weren't properly constructed and/or maintained.

MONTY vs. BAYSIDE COUNCIL - 2010

Cyclist, John Monty, sued BCC and was awarded \$229,000 in damages when he was permanently injured after a fall from his bike on a Shared Path

Judge Phillip Coish found:

I find that BCC breached the duty of care it owed to the plaintiff by approving the installation of the bluestone kerb at the edge of the bike path in a situation in which this meant there was zero lateral clearance on the eastern edge of the path, the bike path was only 2.5 metres wide

MONTY vs. BAYSIDE COUNCIL - 2010



Injured cyclist John Monty at the scene of his accident.

Bayside's director of city strategy, Guy Wilson-Browne, said the council would now examine safety of the entire path in addition to regular six-month inspections.

Quiet Corner remains unchanged.

Bicycle Victoria spokesman Garry Brennan said it was incumbent on councils to identify, assess and remove safety risks on bike paths.

Bayside Leader - 23 March 2010

In the New Daily of 23 February, it was reported:

<https://thenewdaily.com.au/news/national/2019/02/23/electronic-scooters-safety/>

Monash University Accident Research Centre senior research fellow Stuart Newstead told The New Daily little was known about the safety of scooters, leaving regulators to catch up to the technology.

“From what I’ve seen, they have reasonably small wheels and even the concept of having something that goes 15km/h alongside pedestrians, is dangerous,” Mr Newstead said.

All Councils are on notice. The costs of constructing and maintaining footpaths (and Shared Paths) so they meet the Austroads Guidelines will cost billions.

18 Australian Road Rules: In 1999 the Australian Road Rules were proclaimed. The objective: to standardise Road Rules throughout Australia. We are a highly mobile country. We travel intrastate frequently and it’s vital we have the same rules to avoid confusion because where there’s confusion, there’s potential for harm.

In May 2018, the Transport and Infrastructure Council (the Council) directed the National Transport Commission (NTC) to review the Australian Road Rules (ARRs) and highlight any regulatory barriers to the safe use of innovative vehicles and motorised mobility devices across Australia. Submissions will be accepted until Thursday 28 February 2019. A copy is attached.

So what’s the rush. Why aren’t all jurisdictions waiting to see the results of this Review, so that if we are to allow these vehicles on our roads, footpaths and road related areas, we can have a national trial and develop consistent National Road Rules.

19. Why have the “people with disabilities” groups not been properly consulted. Surely there’s scope to challenge the Queensland laws under the Disability Discrimination Act 1992 (DDA). Blind can’t drive - people have to walk. And yet these bully-boy billion dollar US companies see no problems with blind people being required to share footpaths with 16 year olds riding virtually silent Segways at up to 25 km/h on all Queensland footpaths.

On Monday 4 February, it was reported by NPR (National Public Radio – US): Disability Rights Group Sues San Diego over Scooters on Sidewalks

<https://www.npr.org/2019/03/04/698768297/disability-rights-group-sues-san-diego-over-scooters-on-sidewalks>

There is overwhelming evidence that people with disabilities, especially those who are blind and with hearing impediments, are being seriously discriminated against, by the authorities allowing “rideables” including bicycles on footpaths.

It’s only a matter of time before the whole issue is brought before HREOC.

20: Cyclists around Australia have demanded and now have laws requiring motorists to be at least a metre away from them when passing. The Metre-Matters law. Amazingly it allows motorists to cross double lines to do so ... WHEN IT’S SAFE. Back in the good old days before colour TV, when things were black and white. In those days it was illegal to cross double lines because IT’S NOT SAFE. But politicians kowtowed to the cycling lobby – and now the E-Scooter and E-cycling lobby. So why are we pedestrians (the largest and most vulnerable road-user group) not demanding laws requiring cyclists and E-scooterists to remain at least a metre away from pedestrians when passing on Shared Paths and Footpaths – with stiff penalties.

Just observe how utterly cavalier the NSW CfRS has been about Shared Paths:

The national law for Cyclists (ARR) on Shared Path is (quote):

Note **Footpath** is defined in the dictionary.

- (2) The rider of a bicycle riding on a footpath or shared path must:
 - (a) keep to the left of the footpath or shared path unless it is impracticable to do so; and
 - (b) give way to any pedestrian on the footpath or shared path.

Offence provision.


Note 1 **Pedestrian** is defined in rule 18, and **shared path** is defined in rule 242.

Note 2 For subrule (2), **give way** means the rider must slow down and, if necessary, stop to avoid a collision — see the definition in the dictionary.

- (3) In this rule:
footpath does not include a separated footpath.

There are NO obligations for pedestrians on Shared Paths, in spite of misleading information promulgated by various government agencies around Australia who seem to care more about the wants of cyclists than the rights of pedestrians:

<https://roadsafety.transport.nsw.gov.au/stayingsafe/bicycle-riders/shared-paths.html>



Transport
for NSW

Centre for Road Safety

Search

Home
About the centre
Staying safe
Campaigns
Statistics
Speeding
Research
Contact us

- Fatigue
- Alcohol and other drugs
- Mobile phone use
- On the road 65Plus
- Bicycle riders
 - Safe riding
 - Helmets and safety gear
 - Shared paths
 - Tips for drivers
 - Laws
 - Petrol powered bicycles
- Drivers
- Heavy vehicles
- Motorcyclists
- Pedestrians
- Children
- Schools
- Emergencies
- Safer vehicles
- Safe roads

NSW Centre for Road Safety > Staying safe > Bicycle riders > Shared paths

Shared paths

Look out for each other

Across NSW, shared paths are used by pedestrians and bicycle riders. To avoid collisions and make using these paths a pleasant experience, pedestrians and bicycle riders need to watch for each other and follow a few simple rules.

Bicycle riders

When riding on a shared path, always make sure you:

- Give way to pedestrians
- Provide pedestrians with a metre of space when passing
- Keep to the left
- Use your bell to warn others when you are approaching
- Be careful around young children, dogs and older pedestrians, as they are often unpredictable in their movements
- Travel at a safe speed so you can stop within a safe distance of pedestrians on the path


Pedestrians

When walking on shared paths, always make sure you:

- Watch for bicycle riders, who may suddenly approach from behind or around corners
- Keep to the left
- Move off the path to the left if you wish to stop
- Keep animals on short leads and under control

More information

We commissioned research into different aspects of shared path safety in NSW. Our [Shared paths document \(PDF, 122Kb\)](#) has more information on the research findings and summarises the safety issues. For a copy of the full research reports, please use our [Contact us form](#).



Just to point out how utterly absurd and contradictory the NSW CFRS advice is: They maintain that when pedestrians are on Shared Paths and wish to stop, they should move off the Shared Path.

In many perhaps most instances, that means moving onto the road – even, as in the case of the Spit Bridge in Mosman, Sydney, jumping into Middle Harbour.

Pedestrians are NOT required to keep their dogs on a short lead.

Pedestrians are NOT required to keep to the left.

What the law does require is that a cyclists must keep to the left (which is absurd because they are generally passing from behind).

If cyclists and E-Scooters (rideables) are to be permitted on footpaths, (which we oppose) then logically, they should keep to the right – contra flow - as is recommended for pedestrians when walking on roads without footpaths – (so they can see oncoming traffic). Bicycles and E-scooters are silent and often frighten pedestrians when they pass from behind. They also seriously upset dogs.

All, educational material must state that Cyclists and E-scooterist must not only keep to the left, but they MUST SLOW DOWN and give way to pedestrians at all time.

It MUST state EVEN IF THAT MEANS COMING TO A STOP.

That brings into question the use of bells. If the above is the law, why would any cyclist be needing to ring his/her bell unless it was to tell pedestrians to get out of their way?

Bells like horns MUST only be used in emergencies – not to threaten or intimidate.

21 Shared Paths (Shared is a misnomer)

In June 2008, Prof Raph Grzbieta (Professor of Road Safety, Transport and Road Safety Research, UNSW), and the PCA conducted a national survey through AMR Interactive to understand what road users knew about their rights and obligations in Shared Zones. His advice re speed limits on Shared Paths is attached.

The Macquarie Dictionary defines the verb “share” as: 4. to use, participate in, enjoy, etc., jointly. --verb (i) 5. (sometimes followed by in) to have a share or part; take part. –phrase 6. share and share alike, to divide things or benefits equally.

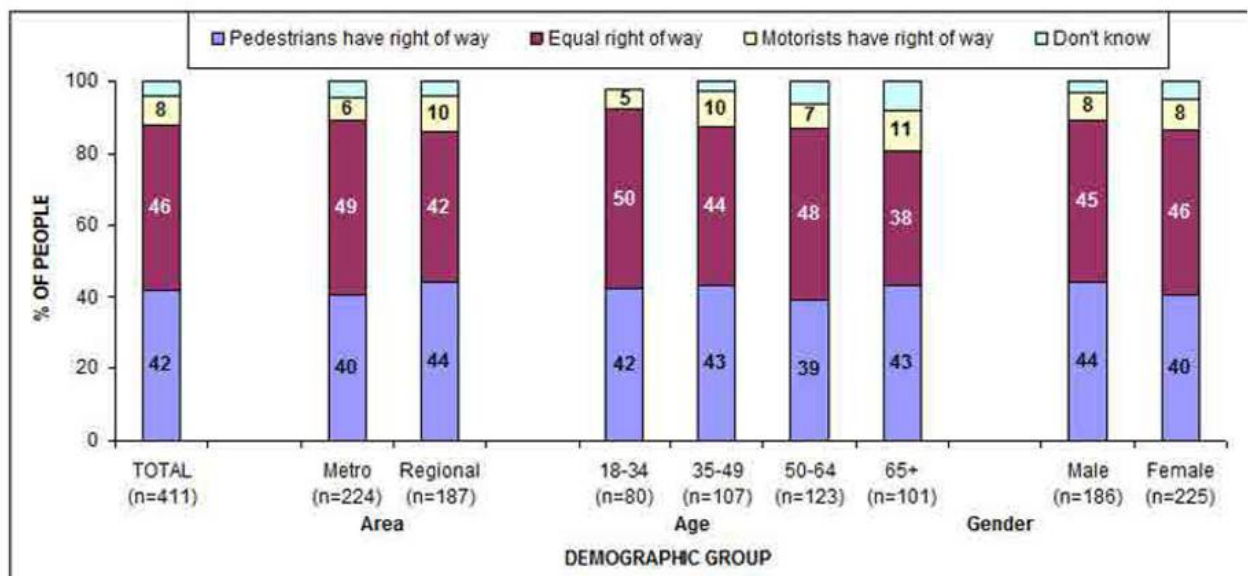
So it is obvious why there is such confusion when a pedestrian has absolute right of way in a Shared Zone and on a Shared Path.

The survey found that 46% of pedestrians and motorists considered pedestrians and motorists had “equal right of way”.

All people...

- Pooling the results, for those aware and unaware, showed that only about two fifths (42%) of people considered that that term ‘Shared Zone’ meant that ‘pedestrians have right of way’.
- A similar proportion (46%) considered the pedestrians and motorists had ‘equal right of way’.

Chart 4. Interpretation of ‘Shared Zone’ among all people (sample sizes shown for each group)





Shared Zones

Double Jeopardy: Apart from the confusing name, the logo features a young girl running away from a driverless car.

There was unequivocal evidence that the term Shared Zone and the logo was misunderstood by a majority of road users.

And where there's confusion, there's potential for harm.

Prior to this, we had written to the CE of the RTA, Paul Forward, who shared our views about Shared Zones.

Three times he went to the NTC, seeking a name change and three times he was refused.

The RTA then decreed that all Shared Zones MUST include a sign beneath stating GIVE WAY TO PEDESTRIANS.

This is NOT the case in other jurisdictions and there remains widespread confusion about the obligations of motorists and vehicles in Shared Zones and on Shared Paths.

The importance of this discussion, is that in states like NSW and Victoria, only children can ride on footpaths unless accompanied by an adult.

If E-Scooters are permitted, as has been mooted in NSW which is considering a trial, they will not be allowed on footpaths, only on Shared Paths.

And the RTA/RMS has stated very clearly:

Once again, I appreciate your comments on vehicle speedometers. However, in the interest of pedestrian safety and amenity, the RTA does not support the introduction of speed limits higher than 10 km/h for *Shared Zones*.

Our Reference: CE03/1694
97M2618

15 JUL 2003

Mr Harold Scruby
Chairman/CEO
Pedestrian Council of Australia Limited
PO Box 500
NEUTRAL BAY NSW 2089



**Roads and Traffic
Authority**

www.rta.nsw.gov.au

ABN 64 480 155 255

Centennial Plaza
200 Elizabeth Street
Surry Hills NSW 2010
Telephone (02) 9218 6209
Facsimile (02) 9218 6693
PO Box K198
Haymarket NSW 1238
DX 13 Sydney

Dear Harold

Thank you for your electronic mail message dated 19 June, 2003 regarding *Shared Zones*.

For the third time, the RTA raised the issue of renaming *Shared Zones* to *Pedestrian Priority Zones* or *Pedestrian Zones* with the Australian Road Rules (ARR) Maintenance Group at its meeting on 3 July, 2003. However, all States, with the exception of NSW, voted against the change of name to *Pedestrian Priority Zone* on the basis that the ARR do not refer anywhere to anyone or any thing having 'priority'. The Maintenance Group rejected the proposal to change the name of *Shared Zones* to *Pedestrian Zones* on the basis of roads generally being for vehicles, where as in a *Shared Zone*, a driver must share the space with pedestrians and give way to any pedestrian in the zone. Additionally, the Group felt that the term *Pedestrian Zone* would indicate that the area was for pedestrians only and that drivers should not drive in such a zone. The Group further reinforced that the erection of *Give Way to Pedestrians* supplementary plates in conjunction with *Shared Zone* signs reinforces a driver's obligation to give way to pedestrians in a *Shared Zone*.

It would not be appropriate for the RTA to change the name of *Shared Zones* in the absence of a national approach to the issue. The RTA will continue to erect *Give Way to Pedestrians* supplementary plates in conjunction with *Shared Zone* signs.

As stated in previous correspondence, as vehicle speeds increase, the risk of serious injury or death to pedestrians involved in a collision with vehicles increases. In order to minimise the risk to pedestrians in *Shared Zones*, the RTA has mandated that a speed limit of 10 km/h will apply. This speed closely represents the walking speed of pedestrians (85th percentile speed of 4.3 km/h) in contrast to a speed limit of 20 km/h. A speed limit of 20 km/h in a *Shared Zone* would introduce a difference five times in magnitude in 85th percentile speed between vehicles and pedestrians.

Once again, I appreciate your comments on vehicle speedometers. However, in the interest of pedestrian safety and amenity, the RTA does not support the introduction of speed limits higher than 10 km/h for *Shared Zones*.

The allocation of demerit points and an increase in the penalty to drivers who fail to give way to pedestrians in a *Shared Zone* is being considered as part of the current review of traffic penalties.

Yours sincerely

Paul Forward
Chief Executive

For the record, in New Zealand:



In New Zealand they correctly and sensibly call Shared Paths “Pedestrian Priority” zones. “The misnomer, “Shared” creates the impression of equal rights, not pedestrian priority.

22 Illegal Shared Path signage by some Councils.

The ARR's are very clear. For a cyclist to ride on a Shared Path, the following signs must be in use:

Shared path sign



End no bicycles sign



These are the lawful signs required by the Australian Road Rules

However, about a decade ago, the City of Sydney decided to design its own Shared Path signage:





This signage is everywhere throughout the City of Sydney.

In 2016, we wrote to the RMS (via Local Govt) regarding the CoS signage. They replied (quote):

As you are aware, under the NSW Road Rules 2014 (rule 242), a shared path begins at either a shared path sign or shared path road marking. These signs and road markings are shown in rule 242(2), and consist of a pedestrian symbol above a bicycle. If a path does not have these signs or road markings, then adult cyclists (aged 12 and over) cannot use the path.

The blue path markings in the photographs you provided do not meet the requirements for indicating a shared path under the NSW Road Rules. However, if used in conjunction with the shared path signs or road markings outlined in rule 242(2), City of Sydney can use the blue path markings to provide behavioural suggestions to cyclists and pedestrians. Other councils use these and similar markings on shared paths as behavioural suggestions.

It follows that the whole of the CoS will need to be re-signposted if E-Scooters are to be permitted to be ridden on Shared Paths.

Apart from rarely complying with the Austroads Guidelines for Shared Paths the CoS commissioned Parsons Brinkerhoff in 2009 to complete a Risk Management Plan for a Shared Cyclists/Pedestrians Path System:

They advised (quote):

On Page 2 of this document there are two definitions:

1.2.7 Pedestrian

A person walking, and including people in wheelchairs, on roller skates or riding on “toy vehicles” such as skate boards or other vehicles, other than a bicycle, powered by human effort or a motor and with maximum speed of 7 km/h.

1.2.8 Cyclist

Rider of a bicycle or a human powered vehicle, with maximum speed of 15 km/h.

This is in line with the Austroads Guidelines

Of course, this maximum speed has never been enforced, however it begs the question as to how Lime Scooters (etc) can possibly expect to be permitted to govern their scooters at 25 km/h – and why the Queensland Govt approved 25 km/h when the South Australian Government has just approved a trial with a maximum speed limit of 15 km/h.

In summation, why is this American company Lime, bullying state governments into rushing into allowing the use of these vehicles on public roads. Why has the Queensland Government kowtowed to Lime and allowed a maximum speed of 25 km/h of these vehicles on footpaths, when the Austroads Guidelines specifically state the maximum must be 15 km/h?

Cities all over the world are now banning these E-scooters from the footpath. We predict that sooner or later, in Australia, there will be a death caused by one of these vehicles and every politician and bureaucrat who promoted this lethal idea will run for cover.

And finally, we are only on the cusp of the technological revolution of battery powered “rideables”.

We cannot even begin to imagine what these vehicles will look like in a decade.

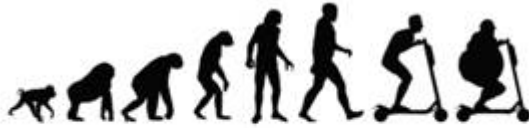
Walking is the first thing an infant wants to do and the last thing an old person wants to give up.

For centuries, the primary purpose of the footpath was and is to protect pedestrians from vehicles and create a safe and inviting place to walk.

Once these myopic and irresponsible politicians and authorities allow these vehicles on the footpath, they will dominate what was once the rightful domain of pedestrians and it will be impossible to turn back the clock.

Just watch this video to see what lies ahead:

<https://www.youtube.com/watch?v=wKBVCuCNQag>



It took humans a million years to learn how to walk...
and five minutes to forget.

Regards

Harold Scruby
Chairman/CEO



Pedestrian Council of Australia Limited

The Walking Class

Registered Charity (ACNC) No: 18075106286

Telephone: (02) 9968-4555 - Facsimile: (02) 9909-8277 - Mobile: (0418) 110-011

Email: mail@walk.com.au - Internet: www.walk.com.au

PO Box 500 - NEUTRAL BAY NSW 2089 – AUSTRALIA - ABN 18 075 106 286

Queensland Government home > For Queenslanders > Transport and motoring > Road safety, rules, fines and tolls > Road rules > Bicycles, skateboards, foot scooters and similar > Rules for personal mobility devices

Rules for personal mobility devices

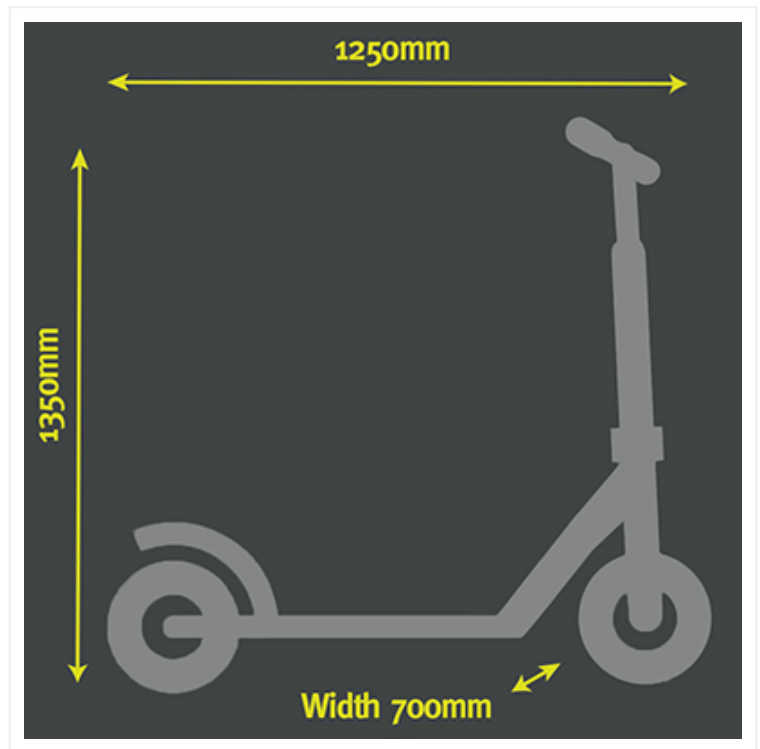
A broad range of personal mobility devices or rideables can be used in public spaces and road related areas in Queensland. You must comply with the road rules to use them.

Remember, people of all abilities use our paths and not everyone can easily move around a device that is obstructing free movement.

Rideables

A rideable in Queensland must:

- be designed for use by a single person only
- fit the following dimensions:
 - 1,250mm in length by 700mm in width by 1,350mm in height
 - or
 - 700mm in length by 1,250mm in width by 1,350mm in height
- have a maximum speed of 25km/h
- have a maximum weight of 60kg—when not carrying a person or load
- be powered by an electric motor
- have 1 or more wheels
- have a braking system
- have no sharp protrusions.



Rules for rideables

For everyone's safety, ride in a safe and respectful manner, especially around pedestrians. Rideables don't need to be registered.

For your safety, **you must:**

- be at least 16 years of age, or 12 with adult supervision

- wear an approved bicycle helmet, that is securely fitted, at all times (unless an exemption has been granted for medical or religious reasons)
- not carry passengers
- not use a mobile device
- not drink and ride
- have a working flashing or steady white light on the front, and a red light and reflector at the rear when travelling at night or in hazardous conditions.

When riding on a path, **you must:**

- Keep left and give way to pedestrians.
- Travel at a speed that allows you to stop safely to avoid colliding with a pedestrian.
- Travel at a safe distance from a pedestrian so you can avoid a collision.
- Keep left of oncoming bicycles and other personal mobility devices.
- Only use the bicycle side of a shared path.

Using a rideable

Rideables should be used on paths wherever possible.

Some limited access to roads is permitted but only in specific circumstances. For example, you can use your rideable to cross a road or avoid an obstruction on a path for up to 50m.

You are allowed to stay on your personal mobility device to cross a road at a designated crossing.

You can also ride on local streets, where it is safe to do so. A local street is a road with a speed limit of 50km/h or less. It must have no dividing line or median strip and if it is a one-way road, it can't have more than one lane.

You must not ride on main roads or streets in the Brisbane CBD.

When permitted to ride on a street you must keep as far to the left side of the road as practicable.

Just like bicycle riders, you may ride alongside 1 other person or vehicle travelling on a road in the same direction. However, you must not cause a traffic hazard by moving into the path of a driver or unreasonably obstruct the path of any other road user.

You must not:

- be towed by another vehicle



- hold on to the back of another vehicle
- ride within 2m of the rear of a moving motor vehicle continuously for more than 200m.

Restricted areas

You must not travel past a personal mobility devices prohibited sign—your local council or land owners may prohibit personal mobility devices in areas like malls, esplanades or jetties.

You should also contact [your local council](#)

to find out if there are any local laws that apply to the use of rideables.

Penalties for non-compliance

If you get caught not complying with these rules you will be fined at least \$130.

Hiring a rideable

If you are using a hired rideable you must leave your device in a safe and responsible way having regard for other path users.

Hire companies may have additional conditions of use in addition these rules.

Hire companies must consult their local council or authority prior to deployment.



Last updated: 19 December 2018



Contact us (<https://www.qld.gov.au/contact-us>)

Help (<https://www.qld.gov.au/help>)

Copyright (<https://www.qld.gov.au/legal/copyright>)

Disclaimer (<https://www.qld.gov.au/legal/disclaimer>)

Privacy (<https://www.qld.gov.au/legal/privacy>)

Right to information (<https://www.qld.gov.au/legal/right-to-information>)

Accessibility (<https://www.qld.gov.au/help/accessibility>)

Jobs in Queensland Government (<http://www.smartjobs.qld.gov.au/>)

Other languages (<https://www.qld.gov.au/help/languages>)

© The State of Queensland 1995–2019

Queensland Government (<https://www.qld.gov.au/home>)

7 January 2013

Mr Harold Scruby,
Pedestrian Council of Australia
walking@walk

Dear Harold,

RE: Shared path across Spit Bridge

I have reviewed the photographs and other materials you sent to me regarding the shared pathway across Spit Bridge. You have indicated to me that the width of the shared pathway at the squeeze point is 1.2 metres as shown in Figure 1. This width is significantly less than the minimum width of 2.5 metres for a commuter path as recommended in the Austroads Guide to Road Design, Part 6A: Pedestrian and Cyclist Paths (AGRD06A/09) and in the Austroads Cycling Aspects of Austroads Guides (AP-G88/11) (see Figure 3). Figure 2 below from the photographs you sent me shows the width appears to be around 2 metres wide, beyond these squeeze points. This width is again significantly less than the minimum width recommended in either of the Austroads guidelines.

The narrowness of the pathway poses a risk of serious injury to both pedestrians and cyclists. For pedestrians, particularly older pedestrians, if they are struck by a cyclist in a frontal impact, they can fall backward, strike the back of their head and suffer serious brain injury. The details of how this can occur are detailed in a peer-reviewed journal paper I published some years ago.

Short A., Grzebieta R.H. and Arndt N., Estimating bicyclist into pedestrian collision speed, International Journal of Crashworthiness, Vol. 12, No. 2, pp. 127–135, 2007.

This analysis was based on a case where a young lady suffered a serious head injury as a result of a cyclist impacting head on into the pedestrian on a shared pathway on Iron Cove Bridge as well as on other published data where older pedestrians were killed by a cyclist striking them in Germany. Our analysis showed that any cyclist-pedestrian impact speed above 10 km/h can result in serious head injury for younger adults and death for older adults. For older pedestrians the risk of being killed is sufficient to warrant that cyclists need to dismount when approaching any elder pedestrian that happen to be walking along the bridge.

Another issue concerns the fencing that lines either side of the pathway. The bars and gaps between the bars can catch a cyclists hands and/or the handle bar causing the bicycle to swerve into the fence. This can also happen when a cyclist is required to avoid striking a pedestrian, a child, a pram, or a dog. Such an impact would eject the cyclist and likely injury the pedestrian/child/baby or animal. Again cycling at any speed above 10 km/h and impacting the fence would also pose a risk of serious injury to the cyclist in such a scenario.

These two hazards, when viewed in combination, are the antithesis of the Safe System approach to road safety and Safe System design that we have been advocating for the past decade and to which all regulatory authorities have signed as a policy position they are committed to implementing (see:

http://www.minister.infrastructure.gov.au/aa/releases/2011/May/AA084_2011.aspx

http://www.infrastructure.gov.au/roads/safety/national_road_safety_strategy/index.aspx).

In my opinion, given the constraints of the narrow pathway and the clear breach of the Austroads guidelines, two solutions that could be immediately implemented to alleviate the risk of a pedestrian or cyclist being injured would be to have the cyclists dismount on entering the bridge pathway and walk their bikes through to the other side. An alternative may be to provide a marked cycle way lane, with a kerbing barrier similar to what is provided on College St in the Sydney CBD, on the road guiding the cyclists away from the footpath and also slow traffic down to 40 km/h adjacent to the cycle way on the bridge.

Either of these interim solutions should be implemented until such time the footpath on the bridge is widened, preferably to a width of 4 metres or a separate bicycle way is constructed along the bridge.

I have also having worked as an expert witness in a number of road safety cases. I am surprised that the council and road authority have allowed the footpath to be shared in a manner where the Austroads Guidelines have been clearly breached in terms of an inadequate width. Allowing cyclists and pedestrians to share the same narrow footpath, and either not requiring cyclists to dismount or not develop an alternative pathway for the cyclists, exposes both the council and the regulator to significant legal liability. However, it should be noted that the guide states:

'This Guide is produced by Austroads as a general guide. Its application is discretionary. Road authorities may vary their practice according to local circumstances and policies.'

It is thus obvious that the council and road authority have used their discretion in this situation and decided not to impose a lower risk solution that overcomes the evident above highlighted breach of the Austroads guidelines and the injury risks I have highlighted. From my expert viewpoint, it would be difficult to justify their position under cross-examination if a pedestrian or cyclists was injured or killed, particularly from a Safe System perspective.

Kind Regards,



Professor Raphael Grzebieta (Raph),
Chair of Road Safety

B.E. (Hons1), M.Eng.Sci., PhD (Monash), FIEAust, CPEng., (NPER), MSAEA, MSAE, RRSP

Ph: 02 9385 4479

Mb: 0411 234 057 (Int: +61 411 234 057)

Email: g.grzebieta@unsw.edu.au

Web: www.tars.unsw.edu.au





Figure 1: Squeeze point where width is less than



Figure 2: Cyclists occupy whole width of pathway leaving no room to pass a pedestrian.

7.5.3 Shared Paths

Table 7.4 shows desirable widths and acceptable ranges of width for shared use paths. As for bicycle paths, the upper limit of the acceptable range in the table should not discourage designers from providing a greater width where it is needed (e.g. very high demand that may also result in overtaking in both directions).

Table 7.4: Shared path widths

	Path width (m)		
	Local access path	Commuter path	Recreational path
Desirable minimum width	2.5	3.0	3.5
Minimum width – typical maximum	2.5 ¹ – 3.0 ²	2.5 ¹ – 4.0 ²	3.0 ¹ – 4.0 ²

1. A lesser width should only be adopted where cyclist volumes and operational speeds will remain low.

2. A greater width may be required where the numbers of cyclists and pedestrians are very high or there is a high probability of conflict between users (e.g. people walking dogs, roller bladders and skaters etc.).

Figure 3: Extract from Guide to Road Design Part 6A: Pedestrian and Cyclist Paths (AGRD06A/09)

Fractures and head injuries: Scooter crashes becoming a 'regular occurrence'



By [Felicity Caldwell](#)

SMH - 20 January 2019

Paramedics are warning people to be safe when using electric scooters in Brisbane, with riders treated for grazes, dislocations, fractures and head injuries.

Queensland Ambulance Service bicycle response team paramedic Madeline Shield said crews had increasingly been called to scooter incidents.



A Lime scooter user on the streets of Brisbane.*CREDIT:AAP*

"It seems to be a regular occurrence that we go to electric-scooter crashes or people coming off those scooters," she said.

Early data showed emergency services responded to about 60 scooter-related incidents since November.

On Sunday night, a man in his 40s fell from an electric scooter while riding along the Brisbane Riverwalk in New Farm.

Paramedics were called to the scene about 11pm and treated the man for a head injury. He was conscious and taken to the Royal Brisbane Hospital in a stable condition.

Watch the ABC video:

<https://www.smh.com.au/politics/queensland/fractures-and-head-injuries-scooter-crashes-becoming-a-regular-occurrence-20190120-p50shv.html>



Dozens of people have presented to emergency departments in the last few months alone with injuries caused by electronic scooter collisions in Queensland.

The spike in injuries coincided with the arrival of US company Lime to Brisbane, with hundreds of electric scooters rolled-out across the inner-suburbs.

Ms Shield said most paramedic call-outs were due to people doing the wrong thing, such as speeding, riding without a helmet, doubling-up, distracted or using drugs or alcohol.

"We believe that they're fun and they serve a purpose around Brisbane but we don't want people to end up in hospital as a result of having fun," she said.

Ms Shield said there had also been near-misses with pedestrians.

"We had one yesterday — a lady was walking through the city and a scooter went past probably a little bit too quickly and she was startled and fell to the ground and ended up with some injuries," she said.

Ms Shield said it was "very common" for users to not be wearing helmets while riding Lime scooters.

"They can go up to 30km/h, so that's a fair speed to come off with no protection," she said.

Transport Minister Mark Bailey said the scooters had been incredibly popular.

"But what we're also seeing is because it's new technology, there's a minority of people there who are doing the wrong thing and putting other people at risk," he said.

"Police will be cracking down on people doing the wrong thing in terms of speeding and not wearing helmets."

Under new rules introduced in December, scooter riders caught misbehaving can be fined \$130.

Riders must wear a helmet, cannot carry a passenger, must give way to pedestrians and they cannot be used on Brisbane CBD roads.

Earlier this month, a 43-year-old Newstead man was charged after allegedly riding a Lime scooter drunk on the road, without a helmet and failing to stop at a red light.

A Lime spokeswoman previously said the vast majority of Lime users rode and parked responsibly.

"We clearly state in our in-app messaging that riders must be over 18, wearing a helmet and are not to ride on the road," she said.

"We always encourage of riders to abide by the same laws and regulations as they would with their own personal vehicle."

The Lime scooter trial in Brisbane has been extended until the end of February, when the council was expected to hold a tender process.



CE16/1355

Mr Harold Scruby
Chairman/CEO
Pedestrian Council of Australia
PO Box 500
NEUTRAL BAY NSW 2089

Dear Mr Scruby

Thank you for your email of 14 October 2016 to the Minister for Local Government, which was referred to Roads and Maritime Services, about shared pathway signage in the City of Sydney local government area.

As you are aware, under the NSW Road Rules 2014 (rule 242), a shared path begins at either a shared path sign or shared path road marking. These signs and road markings are shown in rule 242(2), and consist of a pedestrian symbol above a bicycle. **If a path does not have these signs or road markings, then adult cyclists (aged 12 and over) cannot use the path.**

The blue path markings in the photographs you provided do not meet the requirements for indicating a shared path under the NSW Road Rules. However, if used in conjunction with the shared path signs or road markings outlined in rule 242(2), City of Sydney can use the blue path markings to provide behavioural suggestions to cyclists and pedestrians. Other councils use these and similar markings on shared paths as behavioural suggestions.

Although Road Rule 242 includes an illustration of an end shared path sign, these signs are not essential. A shared path ends either at a road, at the end of the path and/or at an end shared path sign.

Thank you for taking the time to write.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Adam Berry'.

Adam Berry
Principal Network Manager CBD & East Precinct



2 October 2018

Dear

Threats to the mobility of the most vulnerable Victorians

We are writing to all Victorian MPs because our footpaths are facing unprecedented demands that threaten the mobility of the most vulnerable Victorians.

We are seeking your assurance that you will not support a change in road rules to allow teenagers and/or adults to cycle on footpaths in Victoria or to allow electric scooters to travel at speeds greater than 10 km/h.

Footpath cycling

In response to calls by cycling organisations for an increase in the age allowed for footpath cycling in Victoria,¹ transport consultants MRCagney were commissioned by Victoria Walks to review the research on footpath cycling. The *Footpath Cycling Discussion Paper* found that cycling on footpaths introduces risks of cyclist-pedestrian collisions.

Footpath cycling is a particular concern for the most vulnerable pedestrians. Older people and people who are blind or have low vision often rely heavily on walking and accessing public transport to travel independently, but feel extremely nervous sharing environments with cyclists. The MRCagney report outlines:

- “A survey of 607 Victorians with vision impairment found that, as pedestrians, 8% had been involved in a collision and 20% in a near collision over the previous five years. A quarter of these collisions (or near collisions) were with bicycles.”
- “There is evidence that the presence and behaviour of cyclists is a key concern for older pedestrians. In one survey, approximately 40% of seniors identified cyclists on shared walking and cycling paths to be a factor which discouraged them from walking”.
- “A study from Sydney and Newcastle found the average speed of cyclists on footpaths was 21 km/h, the same speed as cyclists on roads.”

Importantly, the report also found that footpaths are not safe for cycling. Most are narrow, often in poor condition, with overhanging trees and high fences blocking views of vehicles coming out of driveways.

¹ Currently in Victoria, only children under 12 years old and accompanying adults can ride on footpaths.

- “Advocacy for footpath cycling appears to be based on the misconception that it is safer. Footpath cycling is accompanied by a distinct set of safety risks for cyclists, particularly associated with visibility between motor vehicles and cyclists at intersections and driveways.”
- “... crash risks for cyclists may be higher on the footpath than on the road.”

The report describes Australian research that estimated the crash rate for cyclists on the footpath was 5.6 times that of cyclists on the road.

A separate study by the Amy Gillett Foundation found that “over half of the child bike rider crashes [between 2002 to 2012] ... involved being hit after emerging from a footpath or driveway².”

Cycling organisations suggest that footpath cycling would make people feel safer, however it is dangerous to pretend footpaths are safe havens for cycling. Cycling safety is important, but solutions should be real, not imagined, and should not come at a cost for pedestrians.

Our opposition to footpath cycling has received wide community support and was extensively covered by television news and a Herald Sun editorial³.

The *Footpath Cycling Discussion Paper* is available at www.victoriawalks.org.au/footpath-cycling.

Electric scooters and similar vehicles

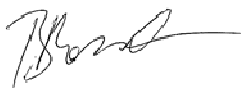
A range of emerging technologies present new challenges. For example, we are aware that an American ride share company promoting electric scooters with a top speed of 24 km/h is currently seeking to increase the maximum speed allowable on the footpath here in Victoria (currently 10km/h).

Fast moving electric scooters and similar devices present comparable problems to cyclists on footpaths. The current regulations are designed to protect the safety of pedestrians and should not be changed simply to suit commercial interests.

We strongly oppose any change to the footpath speed limit, including any trial changes. Any trials should be conducted under the current footpath regulations.

If you require any further information, please contact Ben Rossiter on 9662 3975 or by email brossiter@victoriawalks.org.au.

Yours sincerely,



Ben Rossiter
Executive Officer
Victoria Walks



Rhonda Held
CEO
COTA Victoria



Chris Edwards
Manager of Government
Relations
Vision Australia

² www.amygillett.org.au/wp-content/uploads/2015/09/Road-crashes-AGF-Report-FINAL-Sept-2015.pdf

³ www.victoriawalks.org.au/news/1637