

25 March 2026

NZ Transport Agency Waka Kotahi

Submitted via: [Consultation on lane use improvements | New Zealand Transport Agency Waka Kotahi](#)

Tēnā koutou

**Submission from the Manawatū District Council in response to the Consultation on lane use improvements**

The Manawatū District Council (MDC) thanks the New Zealand Transport Agency Waka Kotahi (NZTA) for the opportunity to submit on the land use improvements consultation. MDC generally supports the intent of the proposed changes, particularly where they improve safety, clarity, and consistency in how different road users interact.

**Proposal 1**

*Do you agree with allowing children aged 12 years and under to ride bikes on footpaths?*

Yes.

MDC supports the proposed change due to safety benefits for young cyclists, and benefits associated with increased uptake of active transport modes, particularly for transport to and from school.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

MDC is satisfied that the current provisions within the Road User Rule that require anyone using a path to be considerate of other users and to not use devices at hazardous speed is sufficient to appropriately manage the risks associated with this change.

**Proposal 2**

*Do you agree with introducing a minimum passing distance when drivers overtake other road users (such as cyclists, horse riders, and micro-mobility users)?*

Yes.

MDC supports the introduction of a minimum passing distance, as it provides greater clarity and consistency for all road users regarding what constitutes safe overtaking behaviour. The current requirement to pass safely is open to interpretation, which can lead to inconsistent behaviour and increased risk for vulnerable road users such as cyclists, horse riders, and micromobility users. Establishing a clear minimum distance sets a more predictable standard, which is expected to improve both actual and perceived safety. From a local government perspective, clearer rules also support

education and behaviour change initiatives, and align with broader safe system principles by reducing ambiguity and promoting safer interactions between different road users.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

MDC notes that there may be practical challenges associated with implementing and enforcing minimum passing distances, particularly on narrow rural roads, which are common throughout the Manawatū District. In these environments, road widths may make it difficult for drivers to consistently achieve the specified passing distances without crossing the centreline or significantly reducing speed. This can create uncertainty for drivers and present enforcement challenges, particularly where it is difficult to accurately assess or prove compliance with a specific passing distance.

MDC acknowledges that safe overtaking behaviour often relies on driver judgement and adapting to the conditions at the time, and that translating this into a fixed minimum distance is not always straightforward in practice. However, MDC considers that the proposed rule still provides value by establishing a clearer baseline expectation of safe behaviour. To support effective implementation, MDC recommends that consideration be given to how the rule will be applied in rural contexts, including the role of driver education, guidance, and enforcement discretion to ensure the rule is practical and proportionate.

MDC also notes that horses present a different risk profile to other road users due to their size and potential unpredictability. While the Road User Rule requires drivers to pass animals safely, it does not currently provide specific guidance on passing distances or speeds when overtaking horses. In rural areas such as the Manawatū District, where horse riding commonly occurs on high-speed roads, a minimum passing distance alone may not always be sufficient to ensure safety. MDC considers that overtaking a horse and rider often requires a greater level of care, including reducing speed and, where practicable, moving fully into the opposing lane. MDC recommends that consideration be given to whether additional guidance or requirements are needed when passing horses, to better reflect these risks.

### **Proposal 3**

*Do you agree with allowing e-scooters to be used in cycle lanes?*

Yes.

MDC evaluated the use of e-scooters on footpaths during the recent review of its Public Places Bylaw. As there are currently no commercial e-scooter operators within the Manawatū District, there are no known significant issues associated with e-scooter use that require active management. However, MDC is aware of issues experienced in larger urban centres with commercial operators, such as Palmerston North, and considers that these provide a useful indication of potential future impacts.

MDC agrees with the behavioural concerns outlined in the consultation document regarding e-scooter use on footpaths, particularly the potential for conflict with other users. Allowing e-scooters to operate in cycle lanes is likely to reduce these conflicts by providing a more appropriate operating environment.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

While outside the scope of this consultation, MDC recommends that future rule reform consider whether the existing classification framework remains fit for purpose for micromobility devices. Currently, e-scooters are classified as “wheeled recreational devices.” This classification does not align with their speed, function, or increasing use as a mode of transport within the network. As a result, inconsistencies arise in where they can operate, the safety expectations placed on riders, and how infrastructure is planned and managed. The need to introduce targeted rule changes (such as clarifying access to cycle lanes) suggests that the existing classification framework may no longer be fit for purpose.

The consultation document recognises that e-scooters travel at similar speeds and face similar risks to bicycle users. Under Rule 11.8 of the Land Transport (Road User) Rule 2004, cyclists are required to wear safety helmets. Given the comparable risk profile, MDC considers that there is a strong safety rationale for applying a similar requirement to e-scooter users, particularly where they are operating within the transport network alongside other vehicles and cyclists.

MDC also notes concerns regarding the obstruction of footpaths by e-scooters that are parked or left in inappropriate locations. While this issue is not directly addressed by this proposal, increased uptake of e-scooter use may exacerbate these effects. MDC recommends that NZTA consider potential controls or guidance to better manage parking behaviour, such as the provision of designated micromobility parking areas.

However, MDC requests that NZTA give consideration to the following:

1. That future rule reform consider whether the existing classification framework remains fit for purpose for micromobility devices.
2. That consideration be given to introducing a requirement for e-scooter users to wear helmets, reflecting their comparable speed and risk profile to cyclists.
3. That consideration be given to potential measures to manage the parking of e-scooters to minimise obstruction of footpaths and accessways.

#### **Proposal 4**

*Do you support requiring drivers to give way to buses leaving bus stops on roads with speed limits of 60 km/h or less?*

Yes.

MDC does not have direct responsibility for public transport. However, MDC has representation on the Regional Passenger Transport Committee (co-ordinated by Horizons Regional Council) and the Manawatū Public Transport Governance Group. MDC’s support for this proposal is out of recognition of the benefits of efficient and effective public transport for communities, including: improving access to education, healthcare and services, reducing transport disadvantage, and supporting mode shift away from private vehicles.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance)?*

MDC has not identified any additional impacts beyond those outlined above.

**Proposal 5**

*Do you agree with the proposal to clarify that signage is not required for berm parking rules to be enforceable?*

Yes.

MDC supports the proposal to clarify that signage is not required for berm parking rules to be enforceable.

From an operational perspective, the current ambiguity regarding signage requirements has resulted in inconsistent approaches across road controlling authorities. Clarifying that signage is not mandatory will support a more consistent and efficient approach, reducing uncertainty for councils when determining whether signage is required.

The proposal also has the potential to reduce unnecessary costs associated with installing and maintaining signage, while still enabling councils to use signage where it is appropriate to support compliance in high-risk or high-demand locations.

MDC considers that the primary benefit of this proposal is the increased clarity it provides, allowing road controlling authorities to apply a more consistent and proportionate approach to managing berm parking.

*Are there any other impacts that need to be considered (such as safety, accessibility, and compliance) if the proposal is implemented?*

While MDC supports the proposed clarification, consideration should be given to how consistency in practice will be achieved across different road controlling authorities.

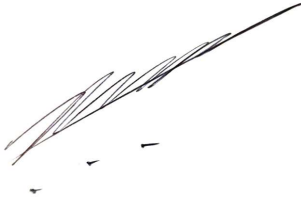
Without signage, there is potential for reduced awareness among road users regarding berm parking restrictions, particularly where practices vary between districts. This may create compliance challenges and require increased reliance on public education and communication.

MDC recommends that NZTA provide guidance to support consistent implementation of the rule change, including when signage is likely to be appropriate and how councils can effectively communicate berm parking restrictions to road users.

**MDC Submission on NZTA Lane Use Improvements Consultation**

Thank you again for the opportunity to provide feedback on NZTA's lane use improvements consultation.

Ngā mihi nui

A handwritten signature in black ink, appearing to read 'Michael Ford', written in a cursive style.

Michael Ford

**Mayor**