

**AA Submission: Traffic Control Devices Amendment
(28 May 2010)**

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Traffic Control Devices Amendment
Rules Team
NZ Transport Agency
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Email: info@nzta.govt.nz

Dear Sir/Madam

TRAFFIC CONTROL DEVICES AMENDMENT 2010

Introduction

The New Zealand Automobile Association (NZAA) welcomes the opportunity to provide comment on the review of the Traffic Control Devices (TCD) Rule.

As an organisation with more than 1.3 million Members, close attention is given to any proposals that relate to managing traffic and related signage.

We circulated the draft Rule for comment to our 17 District Councils. The NZAA District Councils are representative of the membership and deal with policy issues. Comments on the specific proposals for which we have feedback are provided below:

Proposal 1: zone parking and requirements for signing and marking parking restrictions

The NZAA is generally supportive of proposals to reduce the number of signs required to indicate parking restrictions. We endorse amending the Rule to permit road controlling authorities (RCAs) to require repeater signs within a zone no more than 200m apart provided the road parking surface has been marked. We consider this proposal will help reduce visual clutter and may even help motorists take more notice of signs. We think retaining the existing 100m signage interval if the road parking surface is unmarked is appropriate, along with the need to continue to mark each end of the zone and each block within a zone.

The NZAA also supports reserving blue surface marking for optionally indicating disabled car parks, as this should assist with compliance, and we endorse the other recommendations re. marking reserved and time-restricted parking spaces and bus tops and taxi stands.

Proposal 2: description of parking signs, number of signs installed on one pole, and definition of terms

The NZAA is cautious of the proposal to increase the number of signs that can be installed on one pole to four. While, on one hand, this may reduce the number of poles needed in one location and thus address visual clutter issues, on the other hand a greater number of signs on a pole could make it harder for motorists to quickly interpret instructions.

Similarly, we cautiously support the option of RCA's specifying 'reverse-in' parking provided the kerb angle defines the entry direction as suggested in the Rule overview. But we are concerned

that as reverse-in parking is not common in NZ, not all drivers will be comfortable reversing and judging rear overhang, or may simply be unaware of the instruction. This may be particularly true for elderly drivers with limited neck movement or confidence who may find it difficult to complete the manoeuvre, and this could also lead to more frustration for other road users.

Thus we do not encourage the development of reverse-in parking, but urge that if such parking is permitted to be introduced by RCA's, the Rule must specify a minimum design angle of entry (e.g. 90°) for the construction of such carparks. The Rule must also require RCA's to support reverse-in parking with adequate promotion and signage, and initially any non-compliance should be enforced through education and not fines. RCA's should also ensure there is a choice of front- and reverse-in parking in the vicinity, for those drivers who are not confident using the reverse-in carparks.

However, the NZAA endorses the introduction of the new 'P\$' symbol which we think will be well understood and should be widely adopted.

Proposal 4: school bus signs and operation

The NZAA endorses changes to the definition of a school bus so that school charter trips, which are not part of the normal daily school transport schedule, be excluded from the requirement to display a 'school' sign.

We note that while most heavy vehicles are restricted to a maximum speed of 90km/h on the open road, a designated school bus is limited to 80km/h, and this is partly the rationale for the proposal. Given that many such buses may also perform unsigned charter duties and thus be permitted to travel at 90km/h, we wonder whether this change in definition for what will be the same vehicle also provides an opportunity to align the maximum school bus speed to 90km/h, to reduce confusion (and improve compliance) for bus drivers, and reduce frustration for other road users.

We also support amending the Rule to allow the optional flashing lights on school bus signs to operate just prior to the bus stopping to pick up or drop off children until shortly after it has recommenced its journey. However, we are concerned that this operation will be manually controlled (and unlikely to be enforced) and thus the lights may inadvertently stay on and confuse following motorists, and we believe the operation should be automatic or controlled via an alarm or dash-mounted warning light.

The NZAA would also support considering amending the Rule to require all new school buses, or newly-registered school buses, to be fitted with the approved flashing lights as standard.

Proposal 5: roundabout metering signals

There is mixed support from the AA District Councils on this proposal, and overall the consensus is that if traffic volumes from certain roadways entering a roundabout merit the introduction of signals to control the flow, then the roundabout should be converted to a proper traffic light-controlled intersection. In Auckland, where a form of metering is in place at motorway on-ramps, although this has successfully controlled the flow of traffic onto the motorway, it has exacerbated congestion on arterial roads. The risk is that this will happen to the other roadways entering a roundabout, and metered traffic signals on roundabouts do not seem to be the ideal solution when road re-engineering should be considered instead.

Proposal 6: nearside pedestrian signal displays**Proposal 7: countdown signal displays****Proposal 8: on-roadway warning lights at pedestrian crossings**

The NZAA supports all three proposals permitting additional, optional or alternative signal displays at pedestrian crossings, and we note that the proposed use of countdown displays is consistent with pedestrian crossings internationally.

Proposal 15: variable traffic signs on moving vehicles

The NZAA supports amending the TCD Rule to permit roading contractors to use variable message signs on vehicles used in mobile operations, provided the message remains the same whilst the vehicle is in motion.

To that end, we also consider that the Rule could be further amended to permit the use of variable message signs on moving school buses on a similar basis, e.g. "pass at 20km/h". As electronic signs on vehicles are currently not permitted, this is another use that we would like to see explored to further assist in improving safety around school buses as per Proposal 4. Such signs could similarly be activated when the bus is stopping to pick up or drop off children, until shortly after recommencing its journey.

Other issues for comment

Issue 1 minimum size of signs: The NZAA considers that smaller sign sizes than those specified in the TCD could be permitted under circumstances like those outlined in the overview, and this should be investigated further.

Issue 3: shared zone sign:

The NZAA welcomes the introduction of an approved shared zone sign, and although we have no preference for either format, we consider the sign should indicate to motorists the need to slow down, as in the Australian example with a 10km/h advisory. However, the NZAA believes that such a speed is not realistic for motorists to attain as vehicle speedometers are not accurate at this low speed, and therefore we propose adding the word 'SLOW' to the shared zone sign instead of an indicated speed of 10km/h.

Yours sincerely



Mike Noon
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