



Engineers New Zealand
Transportation Group

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Submission on Proposal to Review and replace the Manual of Traffic Signs and Markings

Submission to Land Transport New Zealand

1. Introduction

The Institution of Professional Engineers Transportation Group (“IPENZ TG”) has a membership of over 700 people who work in the fields of transportation, traffic management at all levels of responsibility. They are employed in central and local government, tertiary education, consultancy and industry.

Many members work with the Manual of Traffic Signs and Markings (“MOTSAM”) on a daily basis and have a direct interest in ensuring it (or its replacement) is maintained in a form which is accessible, effective and flexible. The Group welcomes the opportunity to make a submission.

This submission has been prepared in consultation with members, and addresses issues in the discussion document on the Land Transport New Zealand (“LTNZ”) website. It is noted that the main focus of the present document is in determining an appropriate legal, institutional and administrative framework. At a later stage we would welcome an opportunity to participate in the preparation of content as well.

2. Comment on issues

(Italicised references relate to sections in consultation document.)

2.1 *Need for review*

(Section 1)

We agree that there is a need to review and restructure the present MOTSAM. It needs to be a living document regularly updated to provide for current traffic management practice. This need is heightened by recent institutional and legislative changes affecting MOTSAM, and it is a matter of concern that specifications in MOTSAM are not fully consistent with those in the Traffic Control Devices Rule (“TCD Rule”), for example with respect to “Give Way” markings.

Any replacement for MOTSAM needs to reflect the diversity of the roading network throughout New Zealand both between state highways and local roads, and also the diversity amongst local authorities (e.g. North Shore compared to Dunedin). The local road network comprises 87% of NZ roads, and 77% all crashes, 74% fatal and severe injury crashes, and 51% fatalities, yet MOTSAM appears to focus on highways and high volume

roads. This diversity should be reflected in the consultation process and representation in any working groups.

2.2 Format and structure

(Sections 2, 3)

The discussion document outlines a proposed structure for the suite of documents which include the TCD Rule, proposed TCD Specifications, and a proposed Manual for TCD ("MfTCD"). We believe the suite should also link into the RTS and Traffic Note series.

Whatever structure is determined, we believe it needs to meet the following requirements:

- Maintained in a form which is flexible and responsive to practitioner needs. There must be an ability to easily make changes, at least up to Specifications level, and procedures for authorising exceptions.
- Each section of each document needs to have a clear status, for example whether regulatory requirement, mandatory standard or advisory guideline.
- It is important that road controlling authorities ("RCAs") and road users alike have very clear information on their obligations. All documents need to be capable of precise interpretation, with their status identified, the scope of any discretions defined, and static external references (that is no references to "moving targets").

These requirements are particularly important for those matters with significant safety implications, or for which a RCA's actions could be reviewed in legal proceedings such as a traffic prosecution, a coroner's inquest, or suits for negligence.

2.3 Management of documents

(Sections 4, 5, Appendix C)

LTNZ proposes to establish a Traffic Control Devices Management Group ("TCDMG"), whose members will be representative of the industry and will be responsible for the production and maintenance of the proposed suite of documents. As proposed, represented organisations would include LTNZ, Transit New Zealand, Local Government New Zealand/RCA Forum/Trafinz, Road Markers Federation and New Zealand Road Safety Manufacturers Association.

While voluntary participation might be appropriate for an advisory committee, for a body with steering group status and decision-making powers there would need to be assurances that policy development would be thorough and balanced. Without such an assurance, there is a danger that work would be affected by variations in the levels of commitment and initiative from group members, or poor resolution of conflicts of interest.

We note that LTNZ is governed by a board made up of professional directors. The board acts through the Director of Land Transport, who is also vested with TCD powers under legislation. We believe this is an appropriate executive structure for preparation and maintenance of the TCD suite of documents, with the assistance of advisory groups, LTNZ staff and outside consultants as required.

2.4 Funding of documents

(Section 10)

It is also suggested that constituent organisations of the TCDMG meet not only the expenses of their representatives, but also contribute to the cost of producing the documents themselves.

We find this suggestion quite bizarre. Whether or not there was any improper influence, public confidence would be undermined by the knowledge for example that signs and markings standards were partly funded by a voluntary contribution from signs and markings suppliers. We believe it very important that integrity of the process is maintained, with no suggestion of a conflict of interest.

In our view the cost of the document suite is as much a part of maintaining the roading network as is the cost of the TCDs themselves. The suite should be paid for from Government appropriation, the national land transport account, or from compulsory levies.

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