



**Chairman  
National Committee**  
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Maryhill  
**DUNEDIN 9011**

17 July 2009

Bob Gibson  
New Zealand Transport Agency  
Private Bag 6995  
WELLINGTON 6141

Dear Bob

**IPENZ Transportation Group Submission on Manual for Traffic Control Devices  
Part 3 Advertising Signs**

The IPENZ Transportation Group ("IPENZ TG") welcomes the opportunity to provide a submission on the draft of Part 3 Advertising Signs of the Manual for Traffic Control Devices. The IPENZ TG consists of over 1,000 transportation and traffic engineering and planning professionals working in central government, local government, academia, and the private sector. The IPENZ TG represents a segment of considerable expertise in the fields of traffic and transportation and has a significant interest in managing the effects of transportation on society. This submission has been prepared by the National Committee of the IPENZ TG and recognises that this submission may not necessarily represent the position of every member of the Group or their views given the diversity of members.

There are a number of comments we wish to make and these are covered in the attached submission.

The IPENZ Transportation Group is happy to discuss any of the comments contained in the submission and any queries can be directed to the Chairman of the IPENZ Transportation Group, Bruce Conaghan, Senior Traffic Engineer, Dunedin City Council (( (03) 474 3706 / E-mail [bruce.conaghan@dcc.govt.nz](mailto:bruce.conaghan@dcc.govt.nz)).

Yours sincerely

Bruce Conaghan  
**Chairman  
National Committee  
IPENZ Transportation Group**



***Submission to the New Zealand Transport Agency, on the Draft of :***

## **Part 3 Advertising Signs of the Manual for Traffic Control Devices**

***Prepared by:***

***IPENZ Transportation Group***

**July 2009**

## ***Introduction***

The IPENZ Transportation Group (“IPENZ TG”) welcomes the opportunity to provide a submission on the draft of Part 3 Advertising Signs of the Manual for Traffic Control Devices. The IPENZ TG consists of over 1,000 transportation and traffic engineering and planning professionals working in central government, local government, academia, and the private sector. The IPENZ TG represents a segment of considerable expertise in the fields of traffic and transportation and has a significant interest in managing the effects of transportation on society. This submission has been prepared by the National Committee of the IPENZ TG and recognizes that this submission may not necessarily represent the position of every member of the Group or their views given the diversity of members.

## ***General Comments on Draft Guideline***

The IPENZ TG welcomes the decision to produce a New Zealand Manual for Traffic Control Devices of which the Advertising Signs Guideline is Part 3.

The guideline has been produced to a high standard and covers in detail all aspects and types of advertising signs including responsibilities, legal framework, placement and design. When finalised and formally adopted, it will provide a useful reference document for all parties involved in advertising signage.

One aspect not adequately covered in the draft is the issue of advertising signs displayed on moving vehicles (either painted on the body of the vehicle or as fixtures). Some of this advertising can be distracting particularly on the rear of vehicles, with respect to the lettering size and extent of the message. The IPENZ TG recognises that this may be outside the scope of the guidelines given that road controlling authorities are not empowered to deal with this. Such an issue may require more detailed consideration to determine whether there is a need to manage it through a pertinent Land Transport Rule.

## ***Specific Comments on Draft Guideline***

The IPENZ TG has a number of specific suggestions to improve the Guideline as follows:

1. Under Section 4 on Page 4-1, it would be appropriate that election signs for local government be covered here as it does not appear that there is any specific legislation similar to that of the Electoral Act 1993. If this is the case, it may be worthwhile that local body election signage be covered under the Electoral Act as this will set down the key requirements and allow for enforcement.
2. On Page 4-6, the second figure from the top is referred to as Figure 4-14 Business-related advertising rather than Figure 4-13 Business-related advertising.

3. Section 4 should include other forms of advertising such as formal public notices although this should only pertain to those advertising signs required by legislation. With the other types of signs listed, some guidance should be provided for road controlling authorities who can then administer these other types of signs through their respective mechanisms e.g. District Plans.
4. With 5.2 Site selection on page 5-1 (although this is shown as Page 4-1 in the draft), it is recommended that additional information on general requirements and advice is needed given that there is the need to ensure that the placement of advertising signs does not obscure road signs erected by the road controlling authority especially regulatory signs and permanent warning signs.