



10 July 2015

Omnibus Amendment 2015  
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Dear Sir/Madam

## OMNIBUS AMENDMENT 2015 (Rule 10011)

### Introduction

The New Zealand Automobile Association (NZAA) welcomes the opportunity to provide comment on the Omnibus Amendment Rule 2015.

The NZAA is an incorporated society with 1.4 million Members. It represents the interests of road users who collectively pay over \$2 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

Comments on the relevant proposals for which we have feedback are provided below:

### **Traffic Control Devices**

#### *Proposal 6:*

The NZAA does not support this amendment. We submit that road controlling authorities should only be allowed to install *regulatory* warning or advisory road markings as the Rule currently permits. To permit non-regulatory markings risks RCAs installing a plethora of markings that may be confusing or distracting to road users, or superfluous.

In our view, any markings must be those approved in the TCD rule, or approved for trial by the NZTA. Therefore, the NZAA suggests the amended wording should remove the commas and read:

*"A road controlling authority may provide regulatory warning or advisory markings on a road under its control if necessary or desirable for the guidance of traffic or to draw attention to a requirement that controls traffic."*

#### *Proposal 8:*

The NZAA supports the amendment to clarify that signs are required on both roadway approaches to a school crossing point.

AA Submission: Omnibus Amendment 2015

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However, on a related matter, we would like to suggest that the TCD Rule be amended to make it mandatory for all school zones to be marked with "SCHOOL ZONE" signs, and that these must be located within 250m either side of the entrance to the school. We note that the police enforce a lower 4km/h speed tolerance within 250m either side of school entrances even though it is not mandatory to signpost all school zones (although clause 4.2(4) recommends warning signs be located near the entrance to a school). The NZAA supports the police enforcement around schools, but believes motorists' speed compliance would be maximised if school zones were clearly signed and the signage requirements aligned with the police operational policy.

*Proposal 9:*

The NZAA has concerns about this proposal because yellow acts as a warning colour. If reserved carparks are not marked in yellow, a motorist may inadvertently park there when the restriction applies, but not check the sign for restrictions and thereby risk receiving an infringement. In our view, this is less likely if the carpark is marked in yellow as presently specified in the Rule, as this will alert motorists that the carpark is reserved (even if not 24 hours a day) and require them to actively check signage for the restrictions to determine whether they are permitted to park.

The NZAA is concerned that this proposal may lead to increased infringements if a motorist parks on a white-marked residents' carpark when the restriction applies. We think it is fairer if motorists avoid parking on a yellow-marked carpark when the restriction does not apply, rather than risk an infringement by parking there when the restriction is in force.

*Proposal 10:*

The NZAA fully supports amending the description for variable speed limit signs to include the option of a flashing roundel instead of flashing lights in the corner of the sign, and to allow numerals to be 25% larger than on static signs.

*Proposal 14:*

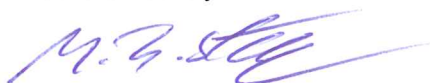
The NZAA welcomes the introduction of new "crash" and "breakdown" signs. The "breakdown" sign will be particularly useful for technicians attending to a vehicle breakdown, such as AA Roadservice officers, and will help alert other road users to a potential hazard.

## **Vehicle Lighting**

*Proposal 21:*

The NZAA does not support this proposal. We see no reason to alter the current wording. Our view is that any vehicle-mounted retroreflective material, whether regulatory signage, hazard panels or optional advertising signage, must comply with the regulatory standards. We are concerned that excluding non-regulatory signage from this requirement may lead to the use of retroreflective vehicle signage that may be distracting to other road users.

Yours sincerely



**Mark Stockdale**  
**Principal Advisor – Regulations**