

Submission on the Land Transport Rules Omnibus Amendment 2016

1 Introduction

- 1.1 TRAFINZ (The New Zealand Traffic Institute Inc) represents a wide grouping of NZ local authorities, covering the majority of the New Zealand population. Its membership includes regional councils, the major metropolitan cities and smaller provincial authorities as well as private sector and non-local government members.
- 1.2 TRAFINZ is please to support almost all of the changes to existing Rules as set out in the Omnibus Amendment. This Amendment contains many minor changes to transport Rules to correct wording errors and provide greater consistency and clarity. There are also a substantial number of changes affecting cyclists which have been brought forward following the report of the Cycling Safety Panel.

2 Comments on the Proposed Amendments

- 2.1 TRAFINZ’s comments are set out below in the same order as in the consultation document.

Proposal No 1

Land Transport Rule	Door Retention Systems 2001
Current Clause or Schedule	Clause 2.2 (4)
OA Rule reference	2.1(2)
Proposed change	Add requirement that all doors on a vehicle can be opened from outside the vehicle.
Issue/Reason for change	Corrects an oversight. Currently the Rule only specifies a door must be operable from inside the vehicle. The driver’s door and passenger doors should be able to be opened from the outside also.

TRAFINZ Comment Support

Proposal No.	2
Land Transport Rule	Heavy-vehicles Brakes 2006
Current Clause or Schedule	Definitions
OA Rule reference	3.1(2)
Proposed change	Amend the definition of ‘twin-steer axle set’ to remove reference to ‘tandem axle’ and make spacing consistent with international manufacturers’ practice.
Issue/Reason for change	This amendment would align the definition of ‘twin-steer axle set’ in the <i>Heavy Vehicles Rule 2004</i> with the definition in the <i>Vehicle Dimensions and Mass Rule 2002</i> (VDAM). The definition was changed in 2008 in the VDAM Rule but was not similarly changed in the Heavy-vehicle Brakes and Heavy Vehicles Rules.

TRAFINZ Comment Support

Proposal No.	2
Land Transport Rule	Heavy Vehicles 2004
Current Clause or Schedule	Definitions
OA Rule reference	4.1(2)
Proposed change	Amend the definition of ‘twin-steer axle set’ to remove reference to ‘tandem axle’ and make spacing consistent with international manufacturers’ practice.
Issue/Reason for change	Refer to proposal 2 above.

TRAFINZ Comment Support

Proposal No. 3
Land Transport Rule Passenger Service Vehicles 1999
Current Clause or Schedule Clause 6.5(2)
OA Rule reference 5.1(2)
Proposed change To update how the Rule refers to the qualifications of persons who conduct inspections of certain electric-powered vehicles.
Issue/Reason for change Sections 75 and 77 of the *Electricity Act 1992* formerly listed the qualifications required for registration as an electrician or electrical inspector. These sections were repealed and substituted on 1 April 2010 by section 13 of the *Electricity Amendment Act 2006* which imposes restrictions on doing or assisting with electrical work. This change will update the current reference to registered electrician and provide for appropriately trained or qualified electricians or inspectors, such as vehicle manufacturer trained inspectors to conduct inspections on hybrid electric, battery power electric or fuel cell powered electric vehicles.

TRAFINZ Comment Support

Proposal No. 4
Land Transport Rule Road User Rule 2004
Current Clause or Schedule Clause 1.6 Interpretation
OA Rule reference 6.1(2)
Proposed change Extend the definition of *defence force emergency vehicle* to include *a counter-terrorism response vehicle operated by the NZ Defence Force*.
Issue/Reason for change This change would assist the NZ Defence Force to support the NZ Police in counter-terrorist operations. See also the same amendment for consistency in the Vehicle Lighting Rule and the Vehicle Equipment Rule.

TRAFINZ Comment Support

Proposal No.	5
Land Transport Rule	Road User Rule 2004
Current Clause or Schedule	Clause 1.6
OA Rule reference	6.1(3)
Proposed change	Expand the definition of “Intersection” to include a place where a cycle path or a shared path crosses a roadway.
Issue/Reason for change	To legally control either the movement of cyclists or road users where a separated path crosses a road way. The definition of “Intersection” needs to include a place where a cycle path or shared path crosses a roadway.
TRAFINZ Comment	Support- will lead to better definition of the crossing (to Code) and improved understanding of responsibilities

Proposal No.	6
Land Transport Rule	Road User Rule 2004
Current Clause or Schedule	Clause 2.7
OA Rule reference	6.1(4)
Proposed change	Permit drivers to encroach onto a flush median when overtaking cyclists.
Issue/Reason for change	Drivers who strictly observe the current rule may attempt to execute unsafe passing manoeuvres around cyclists even when safer passing distances would be available by using the flush median. Drivers undertaking this manoeuvre would still be required to comply with Clause 2.6 of the Rule.
TRAFINZ Comment	Support- noting that drivers may only pass if safe to do so. (adequate passing distance). Also support further amendment to include passing manoeuvres to overtake pedestrians, horses, carts and mobility scooters.

Proposal No.	7
Land Transport Rule	Road User Rule 2004
Current Clause or Schedule	Clause 4.1
OA Rule reference	6.1(5)
Proposed change	For intersections where a cycle path or shared path crosses a road way, require cyclists or pedestrians on a cycle path or a separated path or drivers on a roadway to stop or give way where either group is controlled by a stop sign or a give way sign.
Issue/Reason for change	To legally control either the movement of path users or road users where a cycle path or shared path crosses a roadway. This is because it is sometimes desirable to require drivers on a roadway to give way to cyclists or pedestrians crossing from a path. Most drivers already comply with give way or stop signs at such intersections but this will ensure that compliance is required.
TRAFINZ Comment	<p>Support- as 5 above.</p> <p>This proposal will clarify responsibilities where cyclist and pedestrian movements are controlled by Stop or Give Way signs at intersections as well as clarifying the responsibilities of drivers of motor vehicles with respect to pedestrians and cyclists.</p> <p>We note that the Road User Rule has existing rules which apply to cyclists and pedestrians at signal controlled intersections (Clause 3.1-3.7) and to cyclists at uncontrolled intersections (Clause 4.2.2). However no new rules regarding drivers responsibilities to pedestrians at uncontrolled intersections have been included in this Omnibus Amendment.</p> <p>We understood that changes to the Rule were being considered to require drivers of turning vehicles to give way to pedestrians travelling straight through an uncontrolled intersection. This would bring New Zealand into line with rules in many other countries. We are disappointed that it has not been possible to introduce such changes as part of this Omnibus Amendment. Trafinz supports this change being introduced in future.</p>

Proposal No.	8
Land Transport Rule	Road User Rule 2004
Current Clause or Schedule	Clause 4.5
OA Rule reference	6.1(6)
Proposed change	Clarify that a driver approaching an intersection must not enter a cycle lane if the driver's intended passage or exit is blocked by stationary traffic and a vehicle would obstruct the cycle lane.
Issue/Reason for change	To maintain the free flow of designated cycle lanes, particularly near left turn lanes and reduce the risk of cyclists executing unsafe manoeuvres.
TRAFINZ Comment	Support

Proposal No.	9
Land Transport Rule	Road User Rule 2004
Current Clause or Schedule	Clause 5.8
OA Rule reference	6.1(7)
Proposed change	Remove prescription by amending the Rule to refer to a range of circumstances indicated by a warning sign in which a 20 km per hour speed limit applies.
Issue/Reason for change	Currently, the Rule refers to a sign for 'accident', 'breakdown' or 'emergency'. These three words equate to three signs that are listed in the Traffic Control Devices Rule. However, there is also a "Fire" sign and recently, a "Crash" sign was added to that Rule. The proposal is to refer to the types of circumstances indicated by a warning sign, rather than listing specific signs.
TRAFINZ Comment	Support

Proposal No. 10
Land Transport Rule Road User Rule 2004
Current Clause or Schedule Clause 6.6
OA Rule reference 6.1(8)
Proposed change Allow a bus to enter and leave a cycle lane and to stand at a bus stop in a cycle lane for the purposes of passenger boarding and alighting.
Issue/Reason for change To provide for the ongoing design and construction of cycle lanes with occasional bus stops included. Without a rule change, a cycle lane has to be terminated by a marking or a sign, a bus stop marked and a cycle lane recommenced past the bus stop. While appropriate for busier roads, it is excessive for local roads and lesser used stops.

TRAFINZ Comment Support. We understand that this regularises existing practice which has worked well

Proposal No. 11
Land Transport Rule Road User Rule 2004
Current Clause or Schedule Clause 11.12
OA Rule reference 6.1(9) and 6.1(10)
Proposed change Extend the time period during which lighting and reflector requirements apply to pedal cycles and power assisted pedal cycles.
Issue/Reason for change To improve cyclist visibility by extending the period during which forward and rearward facing cycle lamps and reflectors are required to be used from 30 minutes after sunset and 30 minutes before sunrise to between the times of sunset and sunrise. This change would also apply to the requirement that a cycle must either have pedal reflectors or the person must wear reflective material.

TRAFINZ Comment Strongly Support. The present wording allows an unsafe situation to exist, especially in northern areas of New Zealand where there is a very short twilight period.

Proposal No.	12
Land Transport Rule	Seatbelts and Seatbelt Anchorages 2002
Current Clause or Schedule	Clause 3.2(3)(b)
OA Rule reference	7.1(2) and 7.1(3)
Proposed change	Clarify that seatbelts fitted in the rear of motor homes may be either lap seat belts or lap and diagonal seatbelts.
Issue/Reason for change	Class MB vehicles, as specified in Table 2.4, are not allowed lap belts in rear outer seating positions. However, clause 3.2(3)(b) allows either type of seatbelt in motorhomes. This proposal would clarify that, despite Table 2.4, lap belts may be substituted for lap and diagonal seatbelts in motorhomes.
TRAFINZ Comment	NOT Supported. Lap belts are known to cause serious injuries when activated, especially to children, who are likely to be seated in the back of motorhomes.

Proposal No.	13
Land Transport Rule	Setting of Speed Limits 2003
Current Clause or Schedule	Clause 2.3(3)(b)
OA Rule reference	8.1(2)
Proposed change	Clarify that the rural speed limit is the default speed limit on all motorways, not just those in rural areas.
Issue/Reason for change	The current clause can be misinterpreted as meaning that the rural speed limit applies to motorways in rural areas, but not to motorways in urban areas.
TRAFINZ Comment	Support. We note that the word “default” used to describe the proposed change in the consultation summary table is not used in the proposed new wording of clause 2.3(3)(b) and support the wording proposed: <i>(b) the rural speed limit applies to roads in rural areas (which are generally all areas that are not urban traffic areas) and motorways.</i>

Proposal No. 14
Land Transport Rule Setting of Speed Limits 2003
Current Clause or Schedule Clauses 5.2(2)(b) and 5.3(2)(b)
OA Rule reference 8.1(3) and 8.1(4)
Proposed change Allow temporary speed limits to be 10 km/h less than the permanent speed limit in areas where the permanent speed limit is 50 km/h or less.
Issue/Reason for change Temporary speed limits must be at least 20 km/h less than the permanent speed limit. This reduction is reasonable in rural areas but, for example, in urban areas with 40 km/h permanent speed limits, a 10 km/h reduction to 30 km/h would be adequate for safe traffic management.
TRAFINZ Comment Support

Proposal No. 15
Land Transport Rule Setting of Speed Limits 2003
Current Clause or Schedule Clause 6.1(2)(a)
OA Rule reference 8.1(5)
Proposed change Clarify that variable speed limits may be set for safe or efficient traffic management.
Issue/Reason for change To clarify that the Rule allows a variable speed limit to be set to manage congested roads. There may also be a future need to provide for variable speed limits to control emissions.
TRAFINZ Comment Support

Proposal No.	16
Land Transport Rule	Setting of Speed Limits 2003
Current Clause or Schedule	Clause 8.1
OA Rule reference	8.1(6) and 8.1(7)
Proposed change	Allow a speed limit sign to be placed more than 20 metres from the point a speed limit changes.
Issue/Reason for change	The current requirement is that speed limit signs must be placed within 20 metres of the point the speed limit changes; typically at an intersection. This change would enable some flexibility to place signs elsewhere in clear and safe locations that would make it easier for road users to see or react to the sign.
TRAFINZ Comment	Strongly Support
Proposal No.	17
Land Transport Rule	Setting of Speed Limits 2003
Current Clause or Schedule	Clause 8.5
OA Rule reference	8.1(8)
Proposed change	Allow a Road Controlling Authority to mark the speed limit on the road surface at places other than alongside a speed limit sign.
Issue/Reason for change	It is often useful to place regulatory markings elsewhere, not just alongside signs. The change would clarify that speed limit road markings may be installed where the RCA considers appropriate and not be limited to placement beside a speed limit sign.
TRAFINZ Comment	Strongly Support

Proposal No.	18
Land Transport Rule	Steering Systems 2001
Current Clause or Schedule	Clause 2.5
OA Rule reference	9.1(2)
Proposed change	Replace reference to “Schedule 1” with “Schedule”.
Issue/Reason for change	There is no Schedule 1; there being only one “Schedule” referred to in Part 3 of the Rule.
TRAFINZ Comment	Support

Proposal No.	19
Land Transport Rule	Steering Systems 2001
Current Clause or Schedule	Definitions
OA Rule reference	9.1(3)
Proposed change	Update the definition of <i>New Zealand resident</i> by referring to the <i>Immigration Act 2009</i> .
Issue/Reason for change	This would update the Rule by replacing the reference to the <i>Immigration Act 1987</i> as the Rule has not been updated since new Immigration legislation was enacted.
TRAFINZ Comment	Support

Proposal No. 20
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule Clause 4.4(4)
OA Rule reference 10.1(2)
Proposed change Allow the Agency, by notice in the *Gazette*, to make minor variations to aspects of traffic signs specified in *Schedule 1*.
Issue/Reason for change This change would provide the Agency with the ability to allow for technical innovation and road safety improvements by making minor and technical variations to the colour, shape, dimensions, words, letters, numerals, symbols, number of elements, background, border or legend of traffic signs.

TRAFINZ Comment Strongly Support. This will allow a faster response from the Agency to innovations and changing situations.

Proposal No. 21
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule Clause 5.4(1)
OA Rule reference 10.1(3)
Proposed change Allow the Agency, by notice in the *Gazette*, to make minor variations to the colour, shape, dimensions, words, letters, numerals or symbols of markings specified in *Schedule 2*.
Issue/Reason for change The Agency may make changes to signs by notice in the *Gazette* but it cannot make similar changes to road markings. The change would align both clauses by enabling the Agency to approve changes to road markings in addition to changes to traffic signs.

TRAFINZ Comment Support

Proposal No. 22
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule 5.4(6)
Schedule 1
OA Rule reference 10.1(4) and 10.1(5)
Proposed change Allow the use of blue flashing reflective pavement markers (RRPMs) as ice warning markers.
Issue/Reason for change To authorise the general use of blue RRPMs as ice-warning markers following a trial of blue, flashing, ice-warning, pavement markers. Also to remove requirement for these to be raised so that markers that are flush with the pavement may be used.
TRAFINZ Comment Support

Proposal No. 23
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule 6.2(1A)(c)
OA Rule reference 10.1(6)
Proposed change Remove the requirement for flashing red signals to have a supplementary signal display.
Issue/Reason for change The Rule currently requires all traffic signals, other than temporary signals to have a primary and secondary display. However, flashing red traffic signals at, for example, railway level crossings and emergency vehicle accesses, don't have secondary displays, so the Rule needs to be changed to accommodate this.
TRAFINZ Comment Support. We understand that the proposal will apply at Fire Station accesses.

Proposal No. 5
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule Part 2, Definitions
OA Rule reference 10.1(7) and 10.1(8)
Proposed change Change to the definition of “Intersection” to align with the new proposed definition of “Intersection” in the Road User Rule
Issue/Reason for change See proposal (5) above. Consequential change to align definitions in the Road User Rule and the Traffic Control Devices Rule.
TRAFINZ Comment Support

Proposal No. 24
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule Schedule 1
OA Rule reference 10.1(9)
Proposed change Add new warning signs into Schedule 1 of the Rule.
Issue/Reason for change The new warning signs alert drivers to keep left or drive on the left. A new frost marker sign warns drivers to slow down for frost.
TRAFINZ Comment Support

Proposal No. 25
Land Transport Rule Traffic Control Devices 2004
Current Clause or Schedule Schedule 2
OA Rule reference 10.1(10)
Proposed change Add the road marking for “sharrows” into Schedule 2 of the Rule.
Issue/Reason for change Sharrow road markings are used to indicate that a lane is to be shared between cycles and general traffic. The effectiveness of sharrow trials has been demonstrated throughout New Zealand. This proposal would approve the marking for general use.
TRAFINZ Comment Support

Proposal No.	26
Land Transport Rule	Traffic Control Devices 2004
Current Clause or Schedule	Schedule 3, diagram S4-10.1, S4-10.2 and S4-10.3
OA Rule reference	10.1(11)
Proposed change	Replace the special vehicle display signals diagrams shown in Schedule 3 of the Rule.
Issue/Reason for change	To correct omissions for the traffic signal diagrams. The special vehicle signal display diagrams S4-10.1, S4-10.2 and S4-10.3 in Schedule 3 are missing some aspects, e.g. the left-turn yellow arrow. Correct diagrams are being substituted.
TRAFINZ Comment	Support

Proposal No.	27
Land Transport Rule	Tyres and Wheels 2001
Current Clause or Schedule	Clause 2.7(8).
OA Rule reference	11.1(2)
Proposed change	To correct a typographical error.
Issue/Reason for change	Clarifies the wording of the Clause and improves and readability.
TRAFINZ Comment	Support

Proposal No.	28
Land Transport Rule	Vehicle Dimensions and Mass 2002
Current Clause or Schedule	Table 4.1 Dimension requirements for vehicles and vehicle combinations.
OA Rule reference	12.1(2)
Proposed change	Allow a maximum width requirement of 1.1 metres for all two wheeled vehicles of Classes AA (pedal cycle), AB (power assisted pedal cycle), LA (mopeds) and LC (motorcycles).
Issue/Reason for change	Motorcycle handlebar widths are currently specified to be no more than 50cm either side of the centre of the motorcycle although some manufacturers are making motorcycles with handlebars at 55cm either side of the centre of the motorcycle.
TRAFINZ Comment	Limited Support- Support the proposed width applying to Classes LA (mopeds) and LC (motorcycles) only as the wider handle bars may allow better control of these faster vehicles. Do NOT Support for Class AA (pedal cycles) and AB (power assisted pedal cycles). The extra width will reduce existing clearances on paths, reducing safety.

Proposal No.	4
Land Transport Rule	Vehicle Equipment 2004
Current Clause or Schedule	Definitions
OA Rule reference	13.1(2)
Proposed change	Extend the definition of <i>defence force emergency vehicle</i> to include: <i>(d) a counter-terrorism response vehicle operated by the NZ Defence Force.</i>
Issue/Reason for change	See also proposal 4 above. A consequential change to the definition of “defence force emergency vehicle” in the <i>Road User Rule</i> .
TRAFINZ Comment	Support

Proposal No.	29
Land Transport Rule	Vehicle Exhaust Emissions 2007
Current Clause or Schedule	Table 2.2 and Table 2.4.
OA Rule reference	14.1(2) and 14.1(3)
Proposed change	Add vehicle emissions standard ‘Japan 05’ for all vehicles manufactured after 1 January 2014 so that vehicles may comply with the ‘Japan 05’ or ‘Japan 09’ emissions standard.
Issue/Reason for change	To correct an error identified in the Vehicle Exhaust Emissions Rule (2007). This error may be preventing new light petrol vehicles, manufactured to meet Japanese vehicle emissions standards, from entering the New Zealand fleet. Information sourced from the Japanese Ministry for Land, Infrastructure, Tourism and Transport confirms that the ‘Japan 09’ standard only applies to vehicles with a specific and rare engine configuration.
TRAFINZ Comment	Support

Proposal No.	19
Land Transport Rule	Vehicle Exhaust Emissions 2007
Current Clause or Schedule	Schedule 4
OA Rule reference	14.1(4)
Proposed change	Update Schedule 4 by replacing reference to the <i>Immigration Act 1987</i> with reference to the <i>Immigration Act 2009</i> .
Issue/Reason for change	See also proposal 19 above to update references to the <i>Immigration Act 2009</i> .
TRAFINZ Comment	Support

Proposal No. 30
Land Transport Rule Vehicle Lighting 2004
Current Clause or Schedule Clauses 2.1(7), 2.1(7A) and 2.1(8)
OA Rule reference 15.1(2) and 15.1(3)
Proposed change Allow for the deactivation of optional lighting equipment rather than requiring removal if the equipment does not meet the applicable safety requirements.
Issue/Reason for change To provide vehicle owners with an alternative to completely removing a non-functioning accessory lamp (e.g. fog lamp) from the vehicle if the lamp is not a required piece of equipment.

TRAFINZ Comment Support

Proposal No. 31
Land Transport Rule Vehicle Lighting 2004
Current Clause or Schedule Clauses 3.3 and 7.4
OA Rule reference 15.1(4) and 15.1(6)
Proposed change Require pedal cycle and power assisted pedal cycle front and rear lights to be visible from a distance of 200m between the times of sunrise and sunset or at any other time when a person or vehicle is not clearly at 100m.
Issue/Reason for change Cycle lights that are too dim are a regular factor contributing to crashes involving motor vehicles. The change would improve cyclist visibility by increasing the distance from which front and rear lights for cycles and power assisted pedal cycles are required to be visible (currently 100m). See also proposal 11 regarding extending the times during which lighting and reflector requirements apply.

TRAFINZ Comment Support

Proposal No. 32
Land Transport Rule Vehicle Lighting 2004
Current Clause or Schedule Clause 5.3(2)
OA Rule reference 15.1(5)
Proposed change Remove an unnecessary requirement to fit high mounted stop lamps to vehicles registered before 1/1/1990.
Issue/Reason for change Currently the Rule says that vehicles first registered in NZ on or after 1/1/1990 must have high-mounted stop lamps fitted. Older vehicles were never manufactured with these lights, requiring modification of the vehicle to fit them. This is undesirable, particularly with collectable or classic cars and there is unlikely to be any safety benefit to requiring high mounted stop lamps to be fitted to these vehicles.
TRAFINZ Comment Support

Proposal No. 33
Land Transport Rule Vehicle Lighting 2004
Current Clause or Schedule Clauses 7.6(1A)(a), 7.6(4) and 7.6(5)
OA Rule reference 15.1(7), 15.1(8) and 15.1(9)
Proposed change Remove duplication by revoking 7.6(4) because the same requirement is in 7.6(8). Consequentially amend 7.6(1A)(a) and 7.6(5).
Issue/Reason for change Clause 7.6(8) makes clause 7.6(4) unnecessary. Because clause 7.6(4) is being revoked, the relevant range of sub-clauses specified in 7.6 need to be consequentially amended.
TRAFINZ Comment Support

Proposal No.	4
Land Transport Rule	Vehicle Lighting 2004
Current Clause or Schedule	Definitions
OA Rule reference	15.1(10)
Proposed change	Extend the definition of <i>defence force emergency vehicle</i> to include: <i>(d) a counter-terrorism response vehicle operated by the NZ Defence Force.</i>
Issue/Reason for change	See proposal 4 above. A consequential change to the definition of “defence force emergency vehicle” in the <i>Road User Rule</i> .

TRAFINZ Comment Support

Proposal No.	34
Land Transport Rule	Vehicle Lighting 2004
Current Clause or Schedule	Schedule 3,(f)(iii)
OA Rule reference	15.1(11)
Proposed change	Correct an error by inserting “taken” before “from one part of a farm to another...”.
Issue/Reason for change	Correction of a typographical error to ensure that the clause makes sense.

TRAFINZ Comment Support

Proposal No.	35
Land Transport Rule	Vehicle Standards Compliance 2002
Current Clause or Schedule	Clause 2.5(2)(b)(ii)
OA Rule reference	16.1(2)
Proposed change	Replace the word “civil” with “public” so that the clause reads “the applicant's arrangements for public liability insurance and professional indemnity insurance;”
Issue/Reason for change	‘Civil liability’ has the same meaning as ‘professional indemnity’. The change ensures that the clause covers both public liability insurance and professional indemnity insurance.

TRAFINZ Comment Support

3 Summary

- 3.1 TRAFINZ appreciates the opportunity to make these submissions on behalf of our communities. We welcome involvement in this important area of transport policy development, and are pleased to comment further as requested.

For more information please contact:

Cr Andy Foster

President

New Zealand Traffic Institute (TRAFINZ)

021 227 8537

andy.foster@wcc.govt.nz