



TO NEW ZEALAND TRANSPORT AGENCY

With



16 JUNE 2017

SUBMISSION ON LAND TRANSPORT RULE - SETTING OF SPEED LIMITS 2017

1. GENERAL

Thank you for the opportunity to comment. This is a Joint submission from TRAFINZ and SASTA.

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.

TRAFINZ's Executive is comprised of elected councillors and officers, drawn from a cross section of the membership, together with senior personnel representing its key government partners and supported by a number of senior technical staff from transport consultancies that volunteer their services pro bono.

The Institute's primary focus is on sustainable transportation planning, traffic management and road safety. It provides specialist advice to member authorities on traffic and safety issues by drawing from the depth of expertise available through its members. It also acts as a conduit for local authorities to respond to the NZ Government on new transport policies and legislation.

SASTA (Safe and Sustainable Transport Association) is an independent incorporated society representing professionals working in the area of safe and/or sustainable transport behaviour change in New Zealand. We promote national best practice community activities that seek to improve safety and sustainability on our transport network.

The Submitters generally agree with the changes made to the Rule. However, there are several issues that we believe require greater clarification or revised language. We have also made a number of recommendations for your consideration.

2. IMPACTS OF THE PROPOSALS

It has been noted that the Transport Agency would prefer to obtain feedback that considers:

- What impact would the proposals have, and on whom (particularly on any costs of implementing the proposals);
- Any groups or individuals, in particular, be disadvantaged by the proposals, and how;
- Any groups or individuals, in particular, benefit from the proposals, and how; and
- Any implementation or compliance issues that would need to be considered.

The Submitters will address these points first.

1. What impact would the proposals have and on whom?

- RCAs will incur costs to implement the proposed Rule. The use of the bylaw process to effect the speed limit changes is time intensive and costly. The added costs to authorities in respect to consulting on the bylaw changes need to be funded through National Land Transport Plan (NLTP). The Agency should allow for additional funding for speed management work under the NLTP activity classes:
 - WC 151 Network Management
 - WC 341 Minor improvements
 - WC432 Road safety promotion – engagement, education and consultation
- To reduce the impact of these additional costs we make the following proposal for inclusion in the Rule. **The Rule should enable RCAs to develop Speed Management Plans** as an alternative method of consultation with key stakeholders and the community on speed management activities, including speed limit changes. A Speed Management Plan could set out the proposed speed management activities (including ongoing education and engagement, engineering works and speed limit changes) that an RCA proposes to undertake for a three-year period to link into the Long-Term Plan (LTP) development process. Consultation could be undertaken on this document so that funding for speed management activities would be integrated into the LTP. The RCA could then complete the necessary work throughout the three-year period and implement the speed limit changes by a council resolution, rather than through the full Special Consultative Procedure for each change.

2. Would any groups or individuals in particular be disadvantaged by the proposals and how?

None known

3. Would any groups or individuals in particular benefit from the proposals and how?

- RCA's will benefit from the provision of key data on safe and appropriate speeds (Section 4.3(1)) , information to assist in prioritising where to achieve safe and appropriate speeds (4.3(2)) and the removal of costs associated with the collation of data to comply with the Speed Limits NZ requirements (including speed surveys and rating sheets).

- Users of the roading network will benefit from a more logical and evidence-based system of speed limit signs on their journeys, better attuned to the classification and geometric standard of each section of their route.

4. Are there any implementation or compliance issues that would need to be considered?

- To make changes for roads that cross district boundaries the bylaw process or a Gazette Notice is still required, even if a Speed Management Plan is in place, as suggested above.
- It is unlikely that locally maintained Speed Limit Registers will meet national needs. Most RCAs have registers of local speed limits in the form of schedules to the appropriate bylaw. For some urban and metropolitan RCAs, these schedules are extensive. As an example, Hamilton City has implemented a large number of speed limit changes that are recorded in the Speed Limit Bylaw and its associated schedules. The whole city is defined as an 'Urban Traffic Area' and hence any speed limits other than 50km/h have to be captured in the schedules.
- The introduction of over 390 permanent 40km/h speed limits in Hamilton's local residential areas, and variable 40km/h speed limits for all schools, has meant that the bylaw is now 52 pages in length. This document doesn't currently capture all of the speed limits that have been superseded by these new limits, which would in turn result in an approximate doubling in the document's page length. While a copy of this bylaw is maintained on the HCC website, it is unlikely that many members of the public are aware of it or would make use of this facility.

Every Council holds this data in different formats and in different locations. The impending arrival of self-drive vehicles will require the need for a centralised national register that provides a better level of service for the NZ Police and the public, while also ensuring that we have key information in a format that is up-to-date and accurate for the future needs of this type of information

3. COMMENTS ON THE PROPOSED RULE

The design of the proposed Rule enables key elements of a new approach to speed management. We agree with the following intended outcomes:

- the Transport Agency will provide guidance to RCAs on how to set safe and appropriate speeds for roads within their respective jurisdictions and RCAs must have regard to this guidance when reviewing speed limits ; and
- encouragement of a consistent approach to speed management throughout New Zealand; and
- replacement of the Speed Limits New Zealand (SLNZ) methodology with assessment criteria and outcome statements based on the approach in the Speed Management Guide.

Our support for the following proposals is summarised below followed by more detailed commentary and suggestions for possible improvement to wording and recommendations for action.

Proposal 1

Establish a new speed-setting mechanism that focuses on assisting RCAs to achieve safe and appropriate travel speeds, in particular for areas where there are high benefit opportunities to optimise safety outcomes, economic productivity or both.

We Agree with a new requirement for the Transport Agency to supply safe and appropriate speed information to RCAs, and prioritise information about roads where achieving safe and appropriate speeds is likely to deliver the highest benefits in terms of safety outcomes, economic productivity, or both.

We Agree that it is appropriate to replace the Speed Limits New Zealand (SLNZ) with a set of mandatory criteria in the proposed Rule that the Transport Agency must consider when developing safe and appropriate speed information and that RCAs must have regard to when reviewing speed limits.

Comments: The new approach to setting speed limits is welcomed. It is risk- based and proactive to a prioritised list, rather than reactive to local pressure as can be the case at present. Council staff and their network consultants work closely with regional and central office representatives of NZTA. There is generally close alignment and understanding of road safety and speed management objectives. RCAs (Councils) as the owners and managers of local roads have the better understanding of economic and social impacts from a reduction or increase in transport speed on these roads, particularly for local roads. In the case of Ruapehu District, to take one example, the Agency speed maps provide safe and appropriate speeds for secondary collector roads and above, representing just 6 per cent of the local network. Council has the local knowledge needed to set appropriate speed limits on the rest of the network.

In addition to safety and economic productivity, an important consideration is the impact of speed limits on street amenity and in encouraging active modes, especially on local roads in rural areas. We make further comment and recommendations on this under Definitions later in this submission.

Proposal 2

Enable the setting of a 110 km/h speed limit on roads where it is safe and appropriate to do so.

We Support enabling the setting of a 110km/h speed limit on roads where it is safe and appropriate to do so.

Comments: There is no quantification of travel time benefits and safety costs in the 'Regulatory Impact Statement' supplied with the Draft. The Overview Document simply says that the benefits are reduced journey times and that the estimated benefit cost ratios are marginal for some individual road sections tested. Similarly on the issue of safety, the Document says that the main risk of an increase to 110km/h travel speeds is that if there is a crash the impact speeds could be higher, which could result in greater trauma. An increase in the open speed limit, as seen in 1985, was accompanied by a notable increase in rural fatalities and injuries relative to their urban counterparts¹.

HCVs being still restricted to 90km/h would result in a significant and possibly hazardous speed differential, particularly at on-ramps. However an increase in speed for HCVs is not supported because of the impact on the use of speed limiters. We consider that these will still

¹ Koory G, & Frith W, Changing Rural Speed Limits: Learning from the Past, IPENZ Transportation Group Conference, 29-31 March, 2017.

be used to control truck speed provided all Class 1(ONRC) roads have essentially the same HGV speed limit.

Under the Paris Agreement, New Zealand has undertaken to reduce its emissions by 30 per cent below 2005 levels by 2030. There is no reference to the potential increase in emissions from a 110km/h speed limit.

Recommendation: Proposals for increasing the speed limit to 110km/h on any particular road should be supported by a report on the safety implications and other impacts of the change proposed.

The design of the modern expressway network with long distances between ramps and continuous median barriers means the Police find it increasingly difficult to patrol speeding. To address this, remote detection systems need to be introduced.

Recommendation: *Raising the speed limit should be complemented by a change in legislation that allows remote detection systems to be introduced (such as point to point speed cameras).*

Proposal 3

Allow for a more flexible, efficient and outcomes-based approach to the requirements for permanent repeater speed limit signs.

We Support allowing for a more flexible approach for speed limit signage requirements, where RCAs will not be required to place repeater speed limit signs at the prescribed minimum distances apart in certain circumstances. We suggest tools or mechanisms to ease the use of signage for consideration, such as a “rural speed zone” for large rural areas where repeater signage may be redundant and expensive.

Comments:

While the proposal is supported in principle, it highlights the contradiction between the stated purpose of the Rule to assist RCAs to achieve safe and appropriate travel speeds and the retention of the existing default speed limits. More than one RCA has calculated that much of its rural local road network should be 80km/h, but this may not be self-evident for much of it. Under the requirements of the draft Rule Table 1, for example, one RCA will need 360 repeaters on 950km of rural road.

Clause 9.2(2) relaxes the requirement in Table 1 where the nature of the particular length of road is such that a road user would reasonably understand that the speed limit displayed on the last speed limit sign remains the speed limit throughout the whole of that length of road. We support that change, noting that this approach was adopted for an area-wide demonstration speed limit on Otago Peninsula in 2013. On roads with a great variation in terrain with windy sections and some straights we wonder if the definition of Mean Operating Speed in the Rule is adequate.

NZTA speed maps indicate that most of the rural network has a safe and appropriate speed of 80 km/h or less, creating a requirement for repeater signage that is financially burdensome for smaller rural RCAs, primarily as a result of leaving the default rural speed limit at an inappropriate 100 km/h.

Signage maintenance costs for road signs resulting from vandalism and vehicle damage also

present significant cost to the network funders, so any reduction in signage assets would present savings. Repeater signs in rural areas may also be dangerous if placed in accordance with a fixed separation requirement that does not reflect the local situation where actual travel speeds may be less than the posted limit, such as winding roads which result in deficient safe stopping sight lines and unsafe driving behaviour.

Clause 3.5 allows a RCA to set an urban traffic area. Where extensive areas of a local rural network are proposed to have an 80km/h speed limit, a “Rural Traffic Area” should be available to the RCA to “propose a speed limit that is other than 100km/h for *all roads* in that area” and exempt such areas from the repeater requirements of Table 1, as applies in urban traffic areas. An alternative approach would be to change the default speed limits to 40 (urban) and 80 (rural). However the time is not right for such a proposal and we would ask NZTA and MOT to keep the matter under review and consider such a change following implementation **of the new Rule**.

Recommendation: *Allow RCAs to propose and set a rural traffic area with a speed limit applying to all roads within that area. Also, that MOT and NZTA consider varying the urban and rural default speed limits in the future following monitoring the effect of the new Rule.*

In some circumstances, roads in urban areas should contain more than one repeater sign, unless the stretch of road is particularly short, as this reinforces the speed limit and encourages drivers to slow down in the urban area.

Proposal 4

Enable an RCA to set emergency speed limits on roads directly and indirectly affected by an emergency.

We Support the approach to enable RCAs to set emergency speed limits where an emergency has affected the use of any road and has caused a risk of danger to the public or a risk of damage to a road. Examples of an emergency situation include earthquake, tsunami, land movement, flood, storm, or technological failure. The current arrangement of having to make a specific emergency Rule lowering speed limit on particular roads is a time- consuming and cumbersome process. It will be beneficial for RCAs to be able to introduce Emergency speed limits promptly under the proposed Rule, without reference to the Agency.

Comments: We consider that the time period for an Emergency Speed Limit should be determined using the consultation processes provided by the Rule, rather than defaulting to six months. Six months is a very tight timeframe for an RCA to work through the full bylaw process if it needs to change the speed limit permanently, noting that that the RCA would be likely to take this opportunity to include other speed limit changes in the process in order to minimise costs. It is equally tight for securing the funding and completing works to remedy the circumstances that gave rise to the need for an Emergency Speed Limit.

The criteria for the repeater signs for Emergency Speed Limits, which by their very nature are probably self-explaining and operating at speeds that are within 10 per cent of the speed limit, should also be re-assessed.

Proposal 5

Clarify the grounds upon which an RCA may set a temporary speed limit.

We Support clarifying the grounds upon which an RCA may set a temporary speed limit.

Comment:s: The criteria for setting a Temporary Speed Limit restricts the ability of a RCA to respond to some unsafe road situations, such as at some rural intersections (RIAW's) or during inclement weather where there may be intermittent surface water, or obscured road marking or signage. The criteria in 6.1(2) (a) do not capture these type of situations.

Proposal 6

Approval from the Transport Agency is required before an RCA may set a speed limit of 70 km/h on a road.

This proposal appears to be redundant as it is superseded by Proposal 7.

Proposal 7

Require an RCA to notify the Transport Agency of any proposal to set a speed limit of 70 km/h, 90 km/h, 110 km/h, or a variable speed limit.

We Support the requirement for RCAs to notify the Transport Agency of any proposal to set a variable speed limit or a speed limit of 70 km/h, 90km/h, or 110km/h before carrying out the process of setting a speed limit, as provided by clause 2.3, noting that, other than for emergencies, approval by the NZTA is subsequently required. We are however concerned that it appears that the present procedure for variable limits around schools has not been taken forward into the draft Rule.

Comment:s: TRAFINZ has supported an interval of 20km/h between available speed limits for roads over 50km/h as the new speed limit policy has been developed and this policy has been supported by the Speed Management Working Party. It recognises feedback from drivers that a multiplicity of different limits is confusing and therefore can be a safety risk. The Speed Management Guide provides for 60 and 80 as the only limits to be posted in future between the defaults of 50 and 100. The information from the maps and data base as per the Guide will not provide recommendations to Councils for 70 or 90 as a safe and appropriate speed.

For new speed limit proposals there remains the opportunity for Councils to propose 70 or 90, and for approval of these proposals by NZTA. There will be circumstances where 70km/h is the appropriate balance between efficiency and safety; where 10km/h more is enough to render a stretch of road unsafe for road users, and 10km/h less is an inefficient use of the road. The local Council will know its local roads very well. A case will need to be made that the road cannot be "engineered up" to be safe or that users cannot be convinced of the need to reduce speeds to comply with a lower speed limit.

For **variable speed limits at schools** (40km/h) the present procedure does not require Transport Agency approval so long as they are established in accordance with Traffic Note 37 and the Associated Gazette Notice. This works well and **we submit that this should continue to be allowed in the new Rule.**

4. Other Comments and Recommended Changes within the text of the Rule

Section 2 General Procedure

Under **clause 2.3(2)**, it is unclear why the chief executives of the New Zealand Automobile Association Incorporated and the Road Transport Forum New Zealand continue to be explicitly included in the list of persons who must be consulted. This perpetuates a focus on motorised travel over non-motorised travel. The AA and RTF are already covered by subclause 2.3(2)(h). Without explicit mention of a wide range of road user groups, previous consultations on speed limits have been known to be unsuccessful in obtaining feedback from active travel modes.

Recommendation: *Remove explicit mention of the NZAA and RTFNZ in clause 2.3(2).*

Clause 2.3(3) requires that a RCA must allow a reasonable time for persons consulted under subclause (2) to make submissions on the proposed speed limit. "A reasonable time" is imprecise and provides no guidance for RCAs and no measure against which to judge compliance for the Agency. Territorial Councils as RCAs have much experience in consultation on traffic proposals and it may be that existing Local Government Act guidance is sufficient. This clause could be deleted.

Section 4 Permanent, holiday, and variable speed limits

Two different matters are combined in Section 4 of the Draft Rule. Clauses 4.2 and 4.3 address the provision of safe and appropriate speed information and the responsibilities of the Agency, while 4.1, and 4.4-6 cover the procedure for RCAs proposing or reviewing permanent, holiday, and variable speed limits. Consideration could be given to separating the two subject matters into two sections. This would create a new Section 5, with consequential changes to subsequent section numbering, to give greater clarity.

Recommendation: *Consider placing clauses 4.2 and 4.3 under a new Section 4 Safe and appropriate speed information, and placing clauses 4.1, 4.4, 4.5 and 4.6 under a new Section 5 Permanent, holiday, and variable speed limits.*

Under **clause 4.6**, a RCA may set permanent, holiday, or variable speed limits and must aim to achieve "a mean operating speed less than 10% above that speed limit". This is a significant departure from the 2003 Rule, which assumed the mean operating speeds should seek to match the posted speed limit. This margin could allow mean operating speeds of 10 km/h above the posted speed for a 110km/h road. The rationale for aiming for a mean operating speed limit of up to 10 per cent above the safe and appropriate speed limit for high-speed roads is unexplained, as this may be significantly higher than the design speed of the road and hence increase the risk of crashes. If the mean operating speed is up to 10 per cent above the speed limit, the 85th percentile speeds will be even higher.

Similarly, requiring lower speed roads to have a smaller tolerance, such as 30 km/h roads aiming to achieve a mean operating speed of 33km/h, will make it harder to introduce these lower speed limits.

Recommendation: Reference to 10 per cent above the speed limit should be reviewed and possibly amended downwards so that RCAs should aim to achieve mean operating speeds that are less than 5 km/h above the posted limit..

Section 6 Temporary speed limits

Clause 6.2 provides for a temporary speed limit when there is physical work occurring and 6.3 when there is an unsafe road surface or structure. There may be circumstances outside these limited criteria where use of a temporary speed limit is appropriate to enhance safety, such as at some rural intersections or during inclement weather where there may be obscured road marking or signage.

Recommendation: The criteria in clause in 6.1(2) (a) be broadened to cover the wider range of situations where it would be in the road user's interests to reduce speed.

Clause 6.2(3) requires that a temporary speed limit may apply for no longer than six months. A rigid time limit has been identified as potentially unrealistic. South Island RCAs have noted that their experiences suggest that this time limit would be too brief to obtain additional funding for remediation works in situations necessitating a temporary speed limit. A more appropriate response to temporary speed limits potentially being in place for protracted periods is to require that the RCA review the temporary speed limit if it has been in place longer than six months.

Recommendation: Amend clause 6.2(3) so that it does not require that a temporary speed limit may apply for no longer than six months, but that it must be reviewed if it has been in place for longer than six months.

Clause 6.2(7) allows the Agency or the Commissioner, at any time, to require the removal of a temporary speed limit and the removal of accompanying signs and equipment used to install or support the signs, if satisfied that the reason for the temporary speed limit no longer applies or the temporary speed limit is not appropriate in the circumstances for which the speed limit was set.

The Rule should provide clear guidance on the mechanism for the Agency or Commissioner to be satisfied of the circumstances provided by subclauses 6.2(7)(a) and (b).

Recommendation: Amend clause 6.2(7) to allow the Agency or the Commissioner, at any time, to require the removal of a temporary speed limit and the removal of accompanying signs and equipment used to install or support the signs, only if upon enquiry with the RCA and in review of roading conditions, they are satisfied that the reason for the temporary speed limit no longer applies or the temporary speed limit was not set in accordance with this Rule.

Section 7 Emergency speed limits

Clause 7.2(3) requires that an emergency speed limit may apply for no longer than six months. A rigid time limit has been identified as potentially unrealistic. South Island RCAs have noted that their experiences suggest that this time limit would be too brief to obtain additional funding for remediation works in situations necessitating an emergency speed limit. A more appropriate response to emergency speed limits potentially being in place for protracted periods is to require that the RCA review the emergency speed limit if it has been in place longer than six months.

Recommendation: Amend clause 7.2(3) as for clause 6.2(3).

Clause 7.2(4) requires that, within 10 working days of setting an emergency speed limit, a RCA must, by notice in the *Gazette*, publish what the emergency speed limit is, details regarding where the emergency speed limit applies, the date the emergency speed limit was set, and its reasons for considering that an emergency speed limit is necessary. Clause 7.2(5) requires the same process for any variation of an emergency speed limit. Clause 7.2(6) requires a RCA, if it fails to comply with 7.2(4) or 7.2(5), to immediately remove any speed limit signs installed under 7.2(1).

While it is unclear what practical purpose publishing an emergency speed limit in the *Gazette* would serve, over publishing it through local media and notifying the Agency, it is imperative that speed limit signs are not removed merely in response to a clerical error.

Recommendation: Amend clause 7.2(6) by the addition of: 'unless there remains a risk of danger to any person or a risk of damage to a road due to an emergency that affects the use of the road.'

Clause 7.2(7) allows the Agency or the Commissioner, at any time, to require the removal of an emergency speed limit and the removal of accompanying signs and equipment used to install or support the signs, if satisfied that the reason for the emergency speed limit no longer applies or the emergency speed limit is not appropriate in the circumstances for which the speed limit was set. The Rule should provide clear guidance on the mechanism for the Agency or Commissioner to be satisfied of the circumstances provided by subclauses 7.2(7)(a) and (b). It should not transfer responsibility for determining an appropriate speed limit to either the Agency or the Commissioner, without enquiry with the RCA responsible.

Recommendation: Amend clause 7.2(7) to allow the Agency or the Commissioner, at any time, to require the removal of an emergency speed limit and the removal of accompanying signs and equipment used to install or support the signs, if upon enquiry with the RCA they are satisfied that the reason for the emergency speed limit no longer applies or the emergency speed limit was not set in accordance with this Rule.

Section 8 Roads in designated locations

No comment

Section 9 Signs and road markings

Clause 9.2 sets out the requirement to provide repeater signs. While Schedule 2 sets out the maximum length of road between signs, the proposed Rule potentially provides flexibility for a RCA as they are not obliged to comply with these lengths if the nature of the road is such that a road user would reasonably understand that the speed limit displayed on the last speed limit sign remains the speed limit throughout the whole of that length of road. This concept is encouraging the use of “self-explaining roads”.

However, subclause 9.2(2)(a) allows this exception to apply when “the measured mean operating speed is less than 10% above the speed limit for that length of road”. A road with higher operating speeds does not meet the definition of a self-explaining road.

Recommendation: Amend subclause 9.2(2)(b) so that RCAs are allowed to ignore repeater sign requirements where the function, design, safety, use, and the surrounding environment (land use) of the road remain consistent.

Table 1 in Schedule 2 provides the maximum length of road between repeater signs for permanent speed limits. A threshold of having a repeater sign every two minutes of travel for a set permanent speed limit imposes a significant cost, especially for rural RCAs. The network should move away from a situation in which rural roads have the default speed limit of 100 km/h that the Agency's speed maps show to be neither safe nor appropriate, and towards a situation in which the speed limit is reflective of what is safe and appropriate for the condition of the road. As this becomes the norm and drivers become familiar with a speed environment where speed limits other than 100 km/h are more frequent, fewer repeater signs would be necessary.

Recommendation: Further consideration should be given to the required frequency for repeater signs for permanent speed limits, regardless of subclause 9.2(2)(b).

Part 2: Definitions

In the draft Rule "**Mean operating speed**" is defined as "the mean speed of traffic, including all classes of vehicle, measured in a way that is representative of all traffic speeds on the road over a 7-day period". This is potentially problematic for a few reasons. Firstly, it is not clear whether only free speeds (i.e. not impeded by vehicles in front) are desired. Secondly, technically measuring all classes of "vehicle" includes bicycles, which may not be the intended dataset. Finally, a number of sites may have quite different speed profiles throughout the week, which may lend themselves to the use of dynamic (variable) speed limit treatments.

Recommendation: Clarify the meaning of "mean operating speed".

"**Safe and appropriate speed**" means a travel speed that optimises safety and efficiency outcomes. This is a too limited definition of "appropriate", otherwise "safe and appropriate speed" could as easily have been rendered "safe and efficient speed". The Speed Management Guide Objective 1.1.1 refers to managing speeds that are appropriate "for road function, design, safety, use, and the surrounding environment (land use)". This permits a fuller understanding of what is meant by "appropriate". Introducing these terms into the definition will help ensure that posted speed limits are credible for road users.

Recommendation: Amend the definition of “safe and appropriate speed” by the addition of: and is suited to the road function, design, use and surrounding environment and land use.

“Road” is defined as a list of types of place (street, motorway, beach etc) and also“(iv) a place to which the public has access, whether as of right or not”. This would seem to include cycle paths and paths shared by pedestrians and cyclists. With greater provision for and use of paths for walking and cycling, there have been increasing queries regarding the status of posted speed limits on paths and cycleways, both alongside roadways and completely separate from road corridors. It would be helpful if the proposed Rule clarified the situation regarding the ability to set specific speed limits for pathways and cycleways.

Recommendation: Clarify the application of posted speed limits on paths and cycleways by adding cycleways and paths shared by cyclists, walkers and others to the definition of “road”.

TRAFINZ and SASTA appreciates the opportunity to make these submissions and will be pleased to provide further clarification if required.

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