

27 July 2007



Land Transport New Zealand
PO Box 2840
Wellington

Attention: Bob Gibson

Dear Bob

New Zealand Traffic Institute (TRAFINZ) submission on the draft guideline Parking Control (Volume 13)

Introduction

The NZ Traffic Institute (TRAFINZ) represents a wide grouping of NZ local authorities and other organisations involved in various aspects of land transport. Its membership includes regional councils, the major metropolitan cities and smaller territorial authorities, and government agencies and private sector organisations. The Institute's Executive is comprised of elected councillors and officers drawn from a cross section of the local government membership, together with personnel representing its key agency partners and a number of senior technical staff from transport consultancies that volunteer their services *pro bono*. The Institute's primary focus is on transportation planning, traffic management, and road safety. It provides specialist advice to members on transport/traffic and safety issues, and also acts as a conduit for local authorities to respond to the NZ Government on proposed new and/or amended legislation.

TRAFINZ welcomes the opportunity to comment on the Parking Control (Volume 13) draft document as follows:

Involvement in the preparation of the draft report

Trafinz Executive member, Bruce Conaghan was involved in the development of the draft Parking Control document and consequently Trafinz supports the overall approach taken and commends the Working Group on the quality of the draft document. We take this to be a "living document" which can be amended as needed.

There are a number of specific comments we wish to make and these are covered below.

Status of the document

The document is described in the introduction as part of a suite of guidelines intended to provide best practice guidelines on the use of traffic control devices. In that regard this document and its parent Manual for Traffic Control Devices will fill an important and overdue gap in current NZ best practice guidance for traffic and transport practitioners.

The Document is unnecessarily prescriptive

Trafinz believes that as a guideline the document should be facilitative rather than mandatory/prescriptive. Only where the document refers to matters directly covered by a legal rule should it be prescriptive. In all other aspects it should suggest and offer advice but not adopt a mandatory stance.

For example in clause 4.3.3.second paragraph it says “*When developing residential parking schemes, a balance in parking provision must be sought with any local businesses in the area*” (our underline). We suggest it is a matter for the road controlling authority to determine its own processes and the use of the word “must” is inappropriate. It should be replaced by words such as “it is suggested that” and “should”.

There will be other examples through the document where the mandatory tone needs to be changed.

Practical Application

Trafinz also would like to point out that:

- It is unclear how this document will be practically applied by sign and road marking contractors.
- Identification numbering from device to sign to guidelines is not consistent which is likely to create some confusion and may need further consideration.

Auckland City Council submission

We note that Auckland City is making a submission on the draft document. As a major Trafinz member we commend the Auckland submission which we believe deals with the issues well. For example their submission suggests a:

- Reduction of sign clutter and the need to reduce the number of signs required to denote kerbside parking restrictions.
- Reduction in the quantity of signs required for zonal parking schemes. In this regard the current Rule may not correctly reflect changes to the Traffic Regulations which introduced zonal parking schemes in around 1995/6. These did not in fact require coupon signs to be used at the ends of bus stops, loading zones P 30 restrictions etc.
- Potential use of more kerbside markings rather than signs (this will require significant work to develop a practical regime of markings)

Trafinz supports these suggestions.

(We note that with the Parking Volume 13. Page 6-5 Table 6.5 the sign P4-1 is incorrect.)

Trafinz is happy to discuss and elaborate on any of the matters raised above. Our contact officer is the Chair of the Trafinz Technical Committee Steve Spence, Chief Transportation Engineer, Wellington City Council
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Yours sincerely

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