

Living Streets Aotearoa

Submission on Land Transport Rule - Traffic Control Devices Rule 54002

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Introduction

Living Streets Aotearoa is a society incorporated in 2002, after an informal existence since 1998, to advocate for pedestrians. Our objectives are to

1. promote the social and economic benefits of pedestrian-friendly communities;
2. promote walking as a healthy, environmentally-friendly and universal means of transport and recreation;
3. advocate for improved access and conditions for walkers, pedestrians and runners e.g. walking surfaces, traffic flows, speed and safety;
4. educate national, regional and local authorities, drivers, pedestrians and others on the benefits of walking in order to improve road safety for pedestrians;
5. promote the case for walking through public debate and to relevant authorities;
6. advocate for greater representation of walker and pedestrian concerns in urban and regional land use and transport planning and, as appropriate, at a national level;
7. promote walking as a tourist activity;
8. work for improved signage, maps and other information for walkers;
9. have particular regard for people with special mobility needs and to be inclusive and accessible in the Society's activities;
10. promote clean, well managed, well-lit and safe streets, day and night;
11. promote the design of streets for all purposes, not just for vehicle movements;
12. organise meetings, campaigns, publications and conferences to further the objects of the Society;
13. progressively set up regions and branches of the Society across New Zealand;
14. liaise with other groups, locally, nationally and internationally, to further the objects of the Society.

Our Submission

In general we support the overall intent of the Rule, but we would like to see more education of motorists about their responsibilities towards pedestrians (and cyclists) under these rules. Markings and signals are unlikely to produce a better safety outcome if road users don't know what they mean, or think they can get away with ignoring them.

One situation that does not appear to be covered in this Rule is where vehicle accesses with a significant level of usage, such as to and from car parks, have little or no indication to vehicle users that they are crossing a pedestrian space (e.g. Willis Street and Civic Square in Wellington). We submit that such accesses should be marked to indicate that pedestrians have priority.

4.4(9), 4.5(1) Support for traffic signs

The intention that a traffic sign should be installed on a separate pole should be balanced against the obstruction that a multiplicity of poles can be to pedestrians. There should be an obligation here to minimise any obstruction of the footpath, and all poles should be coloured so as to be clearly visible to pedestrians - there does not appear to be any specification in this

respect in the Rule for poles other than those supporting traffic signals, or those at pedestrian or school crossings.

5.3 Method of marking, 11.4(3)

We support the colouring of bus, transit, light rail and cycle lines, as this gives a clear indication to pedestrians as to the type of traffic that they can expect on the particular section of road. Currently the surface treatment of restricted-use lanes varies from place to place, and even within the same local authority areas. This lack of consistency presents its own risks, and we support a consistent nationwide approach.

Where a marked lane can be used by more than one mode, e.g. cycles on bus lanes, or pedestrians and cycles sharing a common path, this should be marked on the paving to make the sharing rights of both modes explicit.

If it is not accepted that standardised markings and paving colours should be mandatory, the recommendations in the Manual should be worded strongly enough to encourage compliance with a common standard. It is not safe to have confusing variations.

6.3(3) Markings at traffic signals

At present there is little to differentiate limit lines from pedestrian guide lines, which means that it is easy (and common) for drivers to treat the latter as the former, obstructing the pedestrian route as a result. We submit that these lines be readily distinguishable - for instance, in the UK limit lines are solid and pedestrian guide lines are dashed.

6.6 Pedestrian Displays

Using the sequencing described in the rule, it appears that a flashing red light may be followed by either a steady red or a steady green; and a steady green by either a flashing red or no display. In both these cases the former sequence is the one that pedestrians would normally expect; and the latter sequences could cause confusion - why precede a steady green with a flashing red, and why should a steady green change to no display? We submit that flashing red should always follow a steady green and be followed by a steady red, in a similar fashion to the yellow light in vehicular traffic lights.

Provision should also be made to permit 'countdown' displays indicating the time remaining before a change of indication. In Japan they appear to be very effective in curbing impatient crossing against the lights.

7.9 Kerbs, slow points, chicanes and other structures

We support the provision of these traffic-calming devices. In many places traffic calming could be used in many places in preference to pedestrian crossing lights, and this Rule should encourage that. All traffic-calming should be designed so as not to be a danger to cyclists, and speedbump design needs to take account of vehicle occupants who are particularly susceptible to vertical movements - for instance, those in wheelchairs or with back problems, or standing bus passengers.

8.2 Pedestrian crossings

8.2(3) We support the markings of pedestrian crossings being reflectorised.

8.2(4) We support a shorter crossing length with refuges, provided that the need for a refuge does not discourage the provision or encourage the removal of a pedestrian crossing.

8.2(7) Consistent and effective lighting and signage can make a crossing much safer, and non-complying crossings should be made to comply rather than be removed.

8.2(10) We support warning markings and limit lines being made mandatory. Making their use optional will mean that consistency of marking will be eroded, resulting in a loss of clarity in the message being conveyed to drivers. A consistent approach is a safer approach.

8.4 School crossing points

"Children" flag signs should be mandatory, for reasons of both conspicuousness and consistency. Provision should be made for School Speed Zones, as trialled in Christchurch, and for display boards that show what speed a motorist is travelling at in areas which cannot have traffic calming but where speed is often above the limit.

8.7 Removal of pedestrian crossings and indications of pedestrian crossings

Both 3.2(3) and 13.6(1) allow the Director to require the removal of any Traffic Control Device on grounds of safety or non-compliance with this rule. Given that, this section would be needed only if the Director required the removal on other grounds. Why has the Director the power to act with respect to pedestrian crossings on grounds other than safety and compliance? If this power is necessary, why does it apply exclusively to pedestrian crossings, and to no other category of device? We submit that 8.7 be deleted.

10.1 Intersections to be controlled

We support requiring intersections of four or more roads to be controlled. Uncontrolled intersections are a risk to pedestrians and to other road users, and we submit that this logic should be extended to cover all road intersections, including three-way ones.

We also submit that at roundabout intersections specific standard provision should be made to assist pedestrians, such as refuges on each arm.