From: Tim Manning [mailto:manning.timj@gmail.com]

Sent: Sunday, 25 November 2012 7:40 PM

To: Tom Wise

Subject: Rural Roads Speed Limits

Thank you for the opportunity to comment on the Government's proposal to reduce speed limits on (some) country roads. I don't have professional qualifications in the subject, but in recent months I've had more reason to consider traffic behaviour on a familiar road and I don't consider that simply reducing the speed limit is the solution to a complex mix of issues.

While I refer here to the Richmond-Cambridge road by way of example, the issues are widely applicable. I have driven the Richmond Road for 40 years and in recent months up to 4 times a day. I understand that the Clarence Council has recommended this road for reduction in speed limit, but I don't know whether the recommendation has been accepted. My observations are that over time the road carries more traffic, there are more entrances to the road and the double and unbroken lines are now more extensive, reducing the overtaking opportunities to effectively only two stretches for sedate drivers, The mix of traffic has changed too. There have always been heavy vehicles (and light) that use the Mud Walls Road short-cut, there has always been farm equipment on the road, there have always been tourists that tend to be slower and locals/commuters that tend to be quicker. In recent years it seems that more of the visitors are in the 60-70kph range, looking for wineries, maybe driving by GPS? There are certainly more cyclists on the road. This mix of users is a problematic one. Average speeds on the road would be significantly lower (or maybe that's just me), but just because fewer vehicles are (able to be driven) at the limit is not justification to reduce the limit. Consider overtaking.

The road is generally too narrow to safely enable the overtaking of a cyclist when there is a double/unbroken white line. The Road Rules bar crossing these lines to overtake a "vehicle" and a bicycle may/or may not strictly qualify as such, but there is clearly uncertainty for drivers and when the first car slows behind a cyclist, either a queue forms or drivers are forced to choose between subjecting themselves and their passengers to danger and/or potential sanction, or driving at (often amateur) bicycle pace for many kilometres. Observation suggests that drivers are reticent to cross double/unbroken lines in any circumstances and this would be the correct interpretation. (Nevertheless explicit guidance is warranted) Similarly, I have counted 23 vehicles in a queue behind a tractor at around 40km/h. If the first following vehicle can't or doesn't overtake, frustration grows and risk-takers emerge. In truth, it is extremely dangerous for cyclists as the closing speeds are high and when rounding a corner, for example, encountering a cyclist and a vehicle coming the other way is heart-in-mouth. It is a road that requires complete concentration.

I came to consider these issues some weeks ago when in a queue which was ducking in and out of a group of cyclists, about 30 I'd estimate that had spread out over a couple of kilometres in 1s and 2s and 3s and a bunch of around 10. It was like a video game, hard acceleration and hard braking in turn, except that there was the potential for real damage. And vehicles repeatedly crossing double white lines to effect overtakes. When I approached one of the two genuine overtaking stretches (Hanslow's Road), there was a speed camera vehicle on the straight. On this day, the cyclists could be overtaken without breaching 100km/h, but on other days when queues

have had the opportunity to go around a slower vehicle I'm sure >100km/h is common, myself included. Yes, a good place for a speed camera, but hardly a fair one!

This personal history and observations might be said to build a strong case for reducing the speed limit. However, this echos Monty Python - we must do something, this is something, therefore we must do it. Why reduce limits by 10k, why not 20, or 40. Or is it 10 now, 10 later and maybe 10 more a bit later again.

In my own limited testing, it is necessary to increase speed 15-20 km/h more than the vehicle being overtaken if the overtaking operation is to be completed in a reasonable distance. That is to say, that on a road limited to 90km/h, a vehicle travelling at 70km/h cannot be overtaken should there be opportunity to do so i.e. broken lines, no vehicle on-coming. On a road such as the Richmond Road, a reduction in limit would effectively mean no overtaking at all if drivers are not to break road laws, given that opportunities are so limited. A 70km/h vehicle will queue the quicker commuter type vehicles on this and other roads. This might be safe on paper but it is not safe on bitumen. And the genuine speeder that might now exceed 100km/h at night or a rare break in traffic during the day, is hardly likely to be respectful of a 90km/h limit.

The speeder will speed, the average driver will be restricted naturally to slower speeds by the density/speed of traffic. As traffic thins, speeds are able to increase to the limit naturally, so 100km/h is effectively a light traffic limit. But when an overtaking opportunity presents itself, this should be able to be effected in as short a road space as is reasonably possible, with eyes on the road and the vehicle being overtaken, not a manoeuvre stretched out, with eyes on the speedo to maintain a lawful 90km/h.