



New South Wales

IPWEA

INSTITUTE OF PUBLIC WORKS
ENGINEERING AUSTRALASIA



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23 February 2017

Mr. Melvin Eveleigh
Director, Safe Systems
Transport for New South Wales
18 Lee Street
Chippendale NSW 2008

Dear Mr. Eveleigh,

Submission to Transport for New South Wales on the Safety of School Children at Informal Bus Stops on NSW Roads

The Institute of Public Works Engineering Australasia (NSW Division) wishes to provide inputs to your draft context paper on the Safety of School Children at Informal Bus Stops on NSW Roads.

We would welcome the opportunity to provide further detail on the issues raised within this submission.

Please do not hesitate to contact Mick Savage on tel: 8267 3000 or email mick.savage@ipwea.org in relation to this submission.

Yours faithfully,



Mr Garry Hemsworth
Director IPWEA NSW Board



Mr Mick Savage
Roads & Transport Directorate Manager

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**Inputs to the Context Paper on the
Safety of School Children at Informal
Bus Stops on NSW Roads**

Submission by

**INSTITUTE OF PUBLIC WORKS ENGINEERING
AUSTRALASIA
(NSW Division) Roads & Transport Directorate**

23 February 2017

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Executive Summary

The Institute of Public Works Engineering Australasia (NSW Division) is the leading association representing Engineers, Public Works Officers and Road Safety Officers working in, or providing services to local government and the NSW Government. IPWEA (NSW) is ideally placed to advocate for road safety on behalf of local government through the knowledge and expertise of the NSW Roads & Transport Directorate and IPWEA (NSW) Road Safety Panel.

This submission provides input to the Context Paper drafted by the Transport for New South Wales (TfNSW) on the Safety of School Children at Informal Bus Stops on New South Wales roads.

The IPWEA (NSW) supports the recommendations made in the draft context paper and is of the opinion that ensuring the safety of school children around bus stops is a shared responsibility involving State and Local Government. Transport for NSW (TfNSW) and Roads and Maritime Services (RMS), being the State's Road Authority has the primary responsibility of developing standards for all school bus stops, whether formal or informal in all urban, rural, and regional NSW. TfNSW and RMS through Centre for Road Safety (CfRS) must then publicise this guide to bring about awareness to all stakeholders through education and information campaigns. Local Councils, as Road Authorities, must understand their responsibility and in turn implement these guidelines as appropriate. The Local Traffic Committees (LTC) must be available to provide guidance as required.

Recognizing that the strategic review of informal stops may pose a challenge to some regional councils as this would require a considerable amount of resources, the alignment with the proposal for TfNSW to fund Road Safety Audit training for each Council could be considered. Each Council may be provided a small fixed grant in order to incentivize the reviews needed. Currently, this is being done with the Pedestrian Access Mobility Plan (PAMP). A similar program involving bus stops could be created.

Bus companies should be required to make the most of the existing good spots, which may mean moving existing 'convenient' stops in rural areas to the fewer better stop points.

Other areas that may help mitigate risks of accidents involving children at informal bus stops include greater adult supervision while crossing roads, eliminating the need for children to cross the road, and education and information campaigns that take into account the rural and regional setting.

Details of these recommendations are discussed further in this submission. Strategic actions in these areas would likely result in the greatest benefits in terms of reduction in the number of accidents and fatalities involving school children around bus stops and overall improvements in road safety.

Introduction

Children pose a greater risk of suffering from road traffic injuries and fatalities primarily because they lack the physical, behavioural, and psychological abilities necessary to assess and navigate traffic situations. Because of their physical limitations, they find it challenging to see oncoming traffic and are likewise difficult to be seen by vehicle drivers. Moreover, because they are not fully developed physically, they are more susceptible to serious injuries upon impact. Their developing cognitive skills also places them in a more vulnerable position as they often lack the ability to discern and evaluate risks.

Children cannot be expected to understand aspects of the road environment and react in the same way as adults. This reality was unfortunately highlighted by the recent incident that occurred involving a ten year old boy in Coolagolite, NSW last 8 August 2016. The facts of the case have been presented in the Bus Safety Investigation Report of the Office of Transport Safety Investigations (OTSI).¹

Background

On 8 August 2016, a ten year old boy was struck by a vehicle while attempting to cross the road after alighting at an informal bus stop on the Cobargo-Bermagui Road, Coolagolite, NSW.

Following the incident, the Office of Transport Safety Investigation (OTSI) began to investigate into the circumstances surrounding the accident in order to identify contributory factors that lead to the occurrence and develop recommendations for mitigating actions.

In its report, the OTSI concluded that the contributory factors that led to the crash were “a combination of the crossing location, the road topography, and insufficient stopping sight distance between the vehicle and children”². Furthermore, the OTSI determined that “generally, children do not have the perceptual and cognitive capabilities and motor skills, to avoid or respond effectively to this type of situation.”³

The OTSI came up with findings as well as recommendations to the relevant agencies that have oversight on matters of road safety such as Transport for New South Wales (TfNSW), TfNSW’s Centre for Road and Maritime Safety (CRMS), Roads and Maritime Services (RMS), Local Government Councils as well as the bus industry, bus operators, and the local community. The findings and recommendations may be found in the OTSI’s report.

¹ Office of Transport Safety Investigations, 2016 Bus Safety Investigation Report – School child pedestrian fatality Coolagolite NSW.

² Ibid

³ Ibid

Following the accident, a Non-Designated School Bus Stop Working Group was formed consisting of representatives from State Government, Local Councils, and the private sector and held its first meeting on 2 November 2016. One of the action items of the working group was to “come up with a context paper regarding Rural and Regional bus stops to be spearheaded by the RMS, CfRS, and BusNSW.”⁴

TfNSW produced a context paper on the safety of school children at informal bus stops on NSW roads. The purpose of the context paper is “to generate initiatives to prevent further fatalities and serious injuries of school children at informal bus stops with a view to develop policy for informal bus stops in NSW that includes actions and responsibilities for stakeholders which enhances safety provided for these children.”⁵ The paper concludes that “existing practice cannot be considered safe under the Safe Systems approach and exposes our most vulnerable users to significant safety risks.”⁶

This submission seeks to provide inputs and recommendations to the context paper prepared by the TfNSW.

About IPWEA NSW Division

IPWEA (NSW) is a not for profit, membership based, professional organisation representing engineers and others involved in the provision of public works and services predominantly in the local government sector.

IPWEA (NSW) Mission is:

“To enhance the quality of life of NSW communities through excellence in public works and services. This is achieved through our professional association that effectively informs, connects, represents and leads public works professionals for NSW.”

This submission has been prepared by the NSW Roads & Transport Directorate on behalf of the Board, council members and representatives of the IPWEA (NSW) Road Safety Panel.

The Roads and Transport Directorate was set up by IPWEA (NSW) in conjunction with Local Government NSW in 2004 to provide support to its members working in local government across the state. It is supported financially by membership contributions from local councils across NSW.

⁴ Non-Designated Bus Stop Working Group

⁵ Transport for New South Wales, Safety of School Children at Informal Bus Stops on NSW Roads, A context paper 2016

⁶ Ibid

IPWEA (NSW) Road Safety Panel

The Road Safety Panel is a committee of IPWEA (NSW) and is managed by the Roads and Transport Directorate. The Panel's goal is to make a significant and measurable contribution to improve road safety awareness, knowledge and expertise in NSW. Membership of the Panel is by invitation and includes representatives from Transport for NSW, ARRB Group, LG NSW, AITPM, urban and rural councils.

Inputs and Recommendations

This tragic incident draws attention to the immediate need for school bus safety measures particularly choosing the appropriate locations for informal bus stops to prevent accidents like this from recurring. Although assigning informal/non-designated bus pick-up and drop-off points have been a common practice in rural/regional communities, it is only now that the state and local government were compelled to come together in order to develop a policy direction on how these informal/non-designated pick-up and drop-off points should be handled.

Designated bus stops are designed and constructed following recognized standards in consideration of certain parameters such as road speed, local topography, road curvature, clear sighting distances, traffic density, adjacent land uses, and local traffic conditions.⁷ The approval of bus stop locations in NSW is regulated by the Passenger Transport Regulation of 2007, Section 104 which states that **the road authority is the sole approval body for the location of all school bus stops, rural or otherwise, within their jurisdiction. It is the responsibility of the road authority to assess all rural school bus routes and bus stops, and where appropriate, approve those routes and stops for use.**⁸ Non-designated bus pick-up and drop-off points on the other hand, do not go through the same level of planning and scrutiny and in fact, are not required to be made known to local councils as these do not necessitate approval. Thus no over-sight is necessary and in turn, accountability is absent.

Currently, an advice for choosing informal bus stops exists but is not intended as a guideline or requirement.⁹ Most informal bus stops are chosen and agreed upon by bus operators/drivers and bus users or communities. In this case, by the bus company and the parents. Because of the lack of standards, choosing stops is often left to the discretion of those who have limited or no knowledge of the safety implications that come with choosing suitable bus stops. Convenience is often the basis for selection.

⁷ Office of Transport Safety Investigations, 2016 Bus Safety Investigation Report – School child pedestrian fatality Coolagolite NSW

⁸ Tumut Shire Council Provision of Rural School Bus Routes and Bus Stops Policy, Policy No: Roads.07

⁹ Transport for New South Wales, Centre for Road Safety, 2016 Advice for choosing locations of informal school bus stops available at <http://roadsafety.transport.nsw.gov.au/downloads/advice-for-choosing-locations-of-informal-school-bus-stops.pdf>

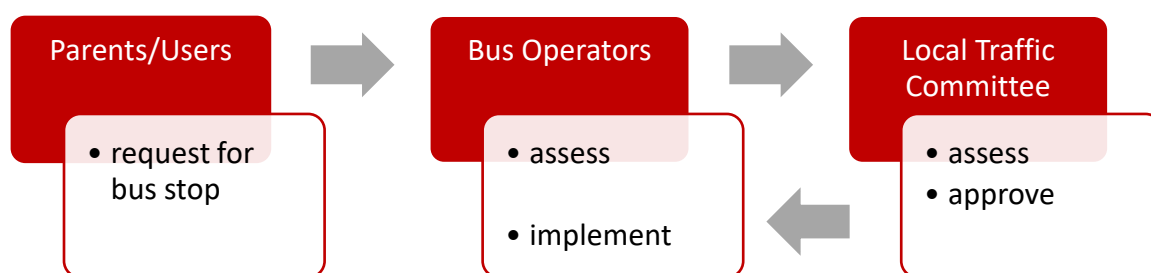
All local councils with the technical assistance of the Local Traffic Committee (LTCs) and with the guidance of RMS, must eventually come up with a policy that can assist communities on how to best select appropriate sites to appoint as informal or non-designated bus pick-up and drop-off points. The local councils through the road authorities and the LTCs have the technical expertise to evaluate and assess the sites chosen as informal bus stops.

The adoption of a formal or standard approach for choosing informal/non-designated pick-up and drop-off points should be given the highest priority and requires immediate action. Once a policy is in place and informal stops have been identified and selected in accordance with the prescribed guidelines, there must be greater monitoring by TfNSW through the Traffic Stop Management [TSM] database) and local councils having jurisdiction over the informal bus stops. The proposed process is as follows:

1. Parents (Users) request bus stop location from bus operator
2. Bus operator assesses from an operating perspective
3. Resulting new stop location be then submitted to the LTC for assessment and approval
4. Approved temporary stops be implemented by bus operators

Note: Initially this will require all stops on all routes to be assessed. In subsequent years, only new stops requested will need assessment.

Figure 1. Proposed process



There is wisdom in requiring local council involvement and commitment through the LTCs as they have the technical expertise to assess suitability and sufficiency in terms of safety and viability of bus stops. Local councils are the area's road authorities and as such are in the best position to appoint or select appropriate sites.

It is acknowledged that the strategic review of informal stops may pose a challenge to some regional councils as this would require a considerable amount of resources. In order to fill this gap, this could be aligned with the proposal for TfNSW to fund Road Safety Audit trainings for each Council. Perhaps a small fixed grant could then be provided to all Councils to incentivize the reviews needed. Currently, this is being

done with the Pedestrian Access Mobility Plan (PAMP). A similar program involving bus stops could be created.

A further recommendation is to suggest that companies make the most of the existing good spots, which may mean moving existing 'convenient' stops in rural areas to the fewer better stop points.

Some risk mitigating measures could also be considered such as eliminating the need for children to cross the road. When bus routes allow, children may remain on the bus throughout a return loop journey to enable them to disembark on the same side of the road of their destination, thus affording them a degree of safety. The downside is that this may extend the length of the trip considerably. Since the accident, more families in the region have considered letting their child remain on the bus loop route to avoid having to cross the road.¹⁰

Another option would be to have more adult supervision. Where there is adult supervision, the probability of a child incurring injuries is significantly reduced.¹¹ The possibility of having an additional adult present in school buses who can supervise young children who may need assistance in crossing the road needs to be explored further. Parents or carers, whenever possible, should be present at the bus stop when the children embark or disembark from the school bus.

Educational campaigns should also consider the rural and regional setting. Information drives directed towards educating and providing road safety advice to school children particularly in areas such as behaving safely around vehicles, walking to and from school, crossing roads, and bus stop safety should also offer specific guidance for children who often need to cross rural roads.

Conclusion

The systems approach is of particular value in child road safety since it departs from the idea that children should adapt their behavior to cope with traffic, in favor of an approach that acknowledges that children's needs should also be addressed in the design and management of the whole road system.¹²

Success in improving safety of children is most likely to be achieved through a holistic approach engaging the participation of all stakeholders. Thus, there is a need for continuous involvement and coordination among state and local engineers and planners, law enforcement officials, bus service providers, and all interested parties. We believe that it is not just a single entity's accountability. It is acknowledged that

¹⁰ Office of Transport Safety Investigations, 2016 Bus Safety Investigation Report – School child pedestrian fatality Coolagolite NSW

¹¹ Peden, M.; Oyegbite K.; Ozanne-Smith J.; Hyder, A.; Branche C.; Rahman, AF.; Rivara, F.; Bartolomeos, K. "World Report on Child Injury Prevention, World Health Organization, 2008. Available at https://www.ncbi.nlm.nih.gov/books/NBK310641/pdf/Bookshelf_NBK310641.pdf

¹² Ibid

everyone has an equal and shared responsibility – State (TfNSW, RMS), Local Traffic Committees (LTCs) and Road Safety Officers (RSOs) through the Local Councils, parents/carers, bus drivers and operators, and the community.

TfNSW and RMS, being the State's Road Authority has the primary responsibility of developing standards for all school bus stops, whether formal or informal in all urban, rural, and regional NSW. TfNSW and RMS through the Centre for Road Safety (CfRS) must then publicise this guide to bring about awareness to all stakeholders through education and information campaigns. Local Councils, as Road Authorities, must understand their responsibility and in turn implement these guidelines. The Local Traffic Committees (LTC) must be available to provide guidance as required.

There must be a clear understanding that everyone has an equal and shared responsibility in ensuring the safety and wellbeing of children while travelling on school buses.

We welcome the opportunity to provide further detail on the issues raised within this submission.

Contact

Please do not hesitate to contact Mick Savage on tel: 8267 3000 or email mick.savage@ipwea.org in relation to this submission.

Yours faithfully,



Mr Garry Hemsworth
Director IPWEA NSW Board



Mr Mick Savage
Roads & Transport Directorate Man

References

Office of Transport Safety Investigations, (2016) Bus Safety Investigation Report – School child pedestrian fatality Coolagolite NSW

Peden, M.; Oyegbite K.; Ozanne-Smith J.; Hyder, A.; Branche C.; Rahman, AF.; Rivara, F.; Bartolomeos, K. (2008), "World Report on Child Injury Prevention, World Health Organization. Available at <https://www.ncbi.nlm.nih.gov/books/NBK310641/pdf/Bookshelf_NBK310641.pdf>

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