



Submission to Joint Standing Committee on Road Safety (Staysafe)

Inquiry into speed limits and road safety in regional NSW

5 July 2022

Introduction

BusNSW is the peak body for the NSW private bus and coach industry. Our members provide essential services and provide a key interface with the travelling public. BusNSW's mission is to foster the efficient and sustainable growth of public transport in NSW, and so promote the benefits of bus travel.

Buses play a vital role in delivering public transport in NSW and prior to COVID carried around 332 million passengers per year, including almost 580,000 students travelling to and from school each day. More passengers are carried by bus in NSW than by any other mode of transport, including rail.

BusNSW members provide bus services under *Transport for NSW* (TfNSW) contracts in Greater Sydney, and in NSW rural and regional areas. They also provide "non-contracted" services in the long distance, tourist and charter sector.

In rural and regional NSW, some TfNSW contracted operators exclusively provide dedicated school services while others provide a combination of both school services and regular passenger services (route services). There are approximately 500 bus operators who deliver rural and regional bus services in NSW through approximately 660 TfNSW contracts. Regional NSW has close to 4,000 bus routes and nearly 90% of these are dedicated school bus routes.

BusNSW supports the principles of Towards Zero – an integrated "safety systems" approach that advocates initiatives for safer roads, traffic speeds, people and vehicles being implemented concurrently. BusNSW works with TfNSW and its *Centre for Road Safety* to develop practical solutions to reduce death and serious injury on NSW roads.

BusNSW actively promotes the annual "*Bus Safety Week*", and "*Be Bus Aware*" campaigns, and encourages its members to spread the safety message to drivers, customers and the community. BusNSW also supports the "*Slow Down to 40 when Lights Flash*" campaign. At the national level, BusNSW supports *National Road Safety Week*, an initiative of the *Safer Australian Roads and Highways* (SARAH) Group.

BusNSW understands that the focus of the Joint Standing Committee's Inquiry is to look at the impact of speed limits and travel times on driver behaviour and safety, the impact of improved vehicle technology and road infrastructure, the use of variable speed limits and any other related matters.

Outlined below are BusNSW's comments in response to each of the Committee's Terms of Reference.

1. The Impact of speed limits and travel times on driver behaviour and safety

Regional and local roads provide a network for communities who use a variety of transport modes, including buses and cars to access work, education, community services and social activities. The ability of local roads to facilitate traffic flow and to avoid congestion assists in reducing driver stress and the potential for accidents and trauma.

Many towns have been designed to maximise the convenience of driving, though such an approach cannot extend into the future. With the significant growth in population over the next thirty years, much greater attention needs to be focussed on improving the popularity and accessibility of public transport. The issue of commuting will be critical, with commuting for work and for work-related business currently constituting the longest trips made by most households.

Over the last few decades, there have not only been changes in how many people are working, but also how many hours we work and where we work. These changes are influencing the way we use our roads and manage the time available to travel. The bus industry is also experiencing a shift in the time of day that people are using public transport. There has been a move away from commuting in the traditional "peak" to travelling in the shoulder or off peak. By better understanding this travel shift, we may be able to improve public transport services and infrastructure as well as travel times and other road user behaviours.

NSW Government contracted bus services operating regular timetabled services in the Sydney metropolitan and outer metropolitan areas are subject to *Key Performance Indicators* (KPI's) including an obligation for operators to meet a Punctuality Rate (i.e., on time running target). The *Public Transport Information and Priority System* (PTIPS) measures the rate and financial penalties apply for non-compliance. This KPI has had an impact on driver behaviour in relation to compliance with timetables and speed. BusNSW understands that some bus drivers are concerned about the pressure of running on time and that it has impacted their decisions to remain in the industry. Under rural and regional bus service contracts, operators have responsibility for measuring their Punctuality Rate, with selected audit by TfNSW. Most rural and regional operators are not subject to financial penalties for non-compliance with on time running targets. BusNSW supports this approach which allows these operators to focus on passenger safety and welfare.

Rural and regional school buses play a vital role in providing access for students to undertake education. These buses operate to a published timetable that provides the scheduled pick up and set down times for the local schools and their community. Inconsistent travel times can affect service delivery on designated bus routes. Late running buses put undue stress on the driver and have a flow on effect to the parents, students and schools. Regional school children are often picked up and set down in isolated areas which further highlights the safety concerns for students and the importance of the school bus service being able to meet its schedule and connections.

Two thirds of fatalities occur on country roads and the fatality rate on country roads is four times higher than on urban roads. School buses and regular (route) bus services compete for space on local roads, and this impacts the safe operation of those services. Given the number of passengers that buses carry, a bus related incident is likely to be a major safety concern. However, many current road safety initiatives focus on cars, with buses generally forgotten. Buses are often required to set down and pick up children on roads that are signposted with a speed limit up to 100kph. There is a need to change other road users' behaviour around the safety of children using school bus services on these roads to ensure that they "*Slow down to 40 when Lights Flash*".

The bus industry has become increasingly concerned with the behaviour of motorists in the vicinity of school buses, particularly in regional NSW. Despite the TfNSW bus flashing lights campaigns at the start of each school term, there seems to be little adherence to the 40 km limit rule among motorists. BusNSW continues to seek greater enforcement of the "*40km when lights flash*" rule to ensure motorists slow down to 40km/h when passing a bus that is picking up or setting down school students (similar to the on road enforcement by the NSW Police Force in school zones).

The NSW Government and the private bus industry has recently completed the *NSW Rural and Regional Bus Seatbelt Program*. The entire NSW fleet of almost 2,600 dedicated school buses in rural and regional NSW is now fitted with seatbelts to provide students improved safety to travel. The industry emphasises the importance of making passengers (particularly school children) wear the seat belts.

NSW Government policy is that students should not stand on school buses travelling on high speed roads outside urban areas or on unsealed roads. However, in exceptional circumstances bus drivers may determine that standing on a school bus with standing capacity, is preferable to a student being left in an unsafe situation, if the bus is at seated capacity. Operators must ensure that buses being used solely or principally for the conveyance of students to and or from school are limited to travelling a maximum of 80 kilometres per hour whenever a student passenger is required to stand. Operators are required to report any routine standing to their TfNSW contract manager.

BusNSW supports the Centre for Road Safety's *Speed Management Program* which is used to improve safety and reliable mobility on NSW roads by identifying priority routes for speed zone reviews and developing policies and guidelines. Maintaining a speed management database across state, regional and local roads is critical to the success of this program.

2. The impact of improved technology and road infrastructure

Rural and regional roads on which buses transport public passengers are often poor. Many roads do not meet current design principles and, due to increases in population, are catering for far greater volumes of traffic than they were originally designed for. Regional bus services are often travelling on unsealed roads which compromises passenger safety and service continuity and increases bus operating costs. Unsealed roads that are prone to "wash out" provide considerable challenges to bus operators and compromise the safety of children who may be waiting for a service to arrive. Local councils have responsibility for developing and maintaining most local roads, however any improvements to roads required by bus operators often

competes with other council funding priorities. BusNSW supports a review of regional bus routes to prioritise the upgrading roads used for those routes.

The lack of basic bus stop infrastructure on regional roads, such as indented bus stopping areas, shelters, signage, and access to and from bus stops (including wheelchair access) is of critical safety importance. These issues warrant urgent attention in order to safeguard bus passengers and reduce the risk of bus and pedestrian accidents.

In rural and regional areas, bus stops are often “informal” and are determined according to where students reside in a given year. Such stops are generally determined by the bus operator and are subject to a risk assessment. This safety assessment is required to reference the *Informal School Bus Stop Guide* published by the *Centre for Road Safety*. The guide advises that where there are continuing concerns about the safety of an informal school bus stop and no practical alternatives are available, advice can be sought from the relevant local council. Bus operators have reported that some local councils have been reluctant to provide assistance.

Regional roads also have a role to play in managing driver fatigue and compliance with the *Heavy Vehicle (Fatigue Management) National Regulation*. The provision of rest areas with adequate lighting, shelters and toilets allows all road users to take breaks which assists in avoiding fatigue-related accidents.

Currently there is a lot of accident and safety data available, however better sharing of data may provide better outcomes. For example, safety issues logged with TfNSW via the *Bus Incident Management Database* and other systems, could be reviewed and shared with local councils and bus operators in other areas to improve safety and plan for future infrastructure.

The NSW government is currently rolling out the *Transport Connected Bus* (TCB) Program. This program provides for vehicle tracking and automatic passenger counting technology across contracted buses in regional NSW. This technology provides customers with real-time trip information and is also providing TfNSW and bus operators with access to more accurate data and tools to improve services and keep buses running on time. BusNSW supports operators being able to use of this vehicle tracking technology to manage travel times and assist with passenger safety.

Communication is a crucial component of managing bus operations and passenger safety. Many rural and regional bus routes operate in areas where there is limited 2-way radio and mobile phone coverage. Effective communication is paramount in the event of a breakdown, a medical episode or a significant delay due to an unforeseen circumstance. BusNSW supports a review into providing greater access to current mobile networks and on-board communication solutions for regional and rural bus operators.

The bus industry is often at the forefront of using new technology to find innovative solutions. Technology, including *Autonomous Emergency Braking* and *Telematics*, will play a greater role in road safety in the future, and any incentives to fast track this technology in buses should be encouraged.

BusNSW acknowledges that the NSW Government launched the *2026 Road Safety Action Plan* in April 2022. The plan includes the following bus related safety initiatives:

- Trialling and encouraging uptake of low-cost retrofitted technology options to increase vulnerable road user detection and warning on heavy vehicles and buses, and to improve direct vision from driver's position.
- Exploring the inclusion of additional critical safety features, such as blind spot detection and lane keep assist, in future TfNSW bus procurement specifications.

In 2021, TfNSW undertook market research to identify prospective suppliers of technology solutions to improve the safety of children around school buses. The primary purpose of the *Request for Information* (RFI) was to seek information from industry on current products/solutions, initiatives and/or developments in the market that might improve the safety of children around school buses. NSW school buses operate in urban metropolitan and isolated rural locations. Solutions of particular interest included, but were not limited to, those that either warn the children and/or the bus driver and/or approaching motorists of a safety risk, and those that improve driver behaviour and speeds around school buses. BusNSW understands that the results of the RFI have not been released to date and is seeking to understand if any new technology that would improve the safety of children around school buses was discovered.

Similarly, TfNSW is transitioning the entire NSW bus fleet to zero emission technology. This provides the foundation for industry to work with government and energy suppliers to trial technologies and develop innovative and cost-effective solutions for regional communities. The NSW Government's budget for 2022-23 provides \$25 million over three years for regional trials in new and emerging technologies, including hydrogen fuel-cell electric buses.

On 1 September 2019, the NSW Government announced changes that require electric, hybrid and hydrogen vehicles manufactured or modified after 1 January 2019 to display a safety label on the front and rear number plates. These labels are intended to help emergency services staff and other first responders in the event of a crash. Vehicles can be quickly identified as having electric or hydrogen components, enabling specific procedures to be followed to make the incident safe for all present. These types of support measures need to be extended to on-road and depot infrastructure in order to ensure the safety of transport workers and the broader community.

There is a further safety dimension associated with electric buses. The greatest hazard associated with bus travel involves pedestrians, bike riders and other road users crossing the path of a bus. Electric buses are far quieter than traditional heavy vehicles and have the potential to increase injuries and fatalities to pedestrians and others unaware of their proximity. Educational campaigns will therefore be required to promote safety around electric buses. BusNSW recommends that education and awareness campaigns are developed to ensure passengers and the public are aware of risks relating to zero emission buses.

3. Use of Variable Speed Limits

Variable speed limits in the Sydney metropolitan area are currently providing significant assistance to the delivery of bus services. Changes in road conditions can create traffic congestion and delays. The use of variable speed limits can aid in allowing traffic to flow more safely and efficiently, particularly in adverse weather. Bus operators currently work closely with the *Transport Management Centre* (TMC) to minimise disruptions in the network.

Bus breakdowns are one of the most common types of incident in the bus and coach industry. While breakdowns can occur in all motor vehicles, the hazards associated with bus breakdowns, where the vehicle is usually carrying public passengers and often schoolchildren, can be significant. In late 2020, BusNSW was awarded funding by the *National Heavy Vehicle Regulator* as part of the Australian Government's *Heavy Vehicle Safety Initiative* program to develop best practice safety guidelines for bus breakdowns. Throughout 2021, BusNSW worked closely with the *Bus Industry Confederation (BIC)*, state bus associations and other parties including the SARAH Group to develop a Bus Breakdown Guide. This Guide was completed in late 2021 and made available to bus operators throughout Australia in early 2022. The release of the Guide and a video has been complemented by a community awareness campaign that promotes slowing down for a bus breakdown.

The ability to be able to change speed limits and notify other road users to slow down in the event of a bus breakdown is of critical importance. BusNSW supports a greater use of variable speed limits on rural and regional roads.

4. Other Relevant Matters

The presence of heavy vehicles such as semi-trailers, B-doubles and other large trucks, along bus routes can impact on the safety of school bus travel. This is particularly the case in rural areas, where the road used is often a narrow single carriageway, or winding with poor visibility on curves and crests, and higher speed limits prevail.

Local communities often hold key information on speed limits and safety issues in their area and are usually enthusiastic about assisting road planning authorities to find solutions to safety concerns. Communities can also influence safer local behaviour. Consultation with these communities and their representatives should form part of any government road policy or plan. There should be a consistent and straightforward process for the local community to provide feedback to government and other stakeholders on road safety matters.

Parents and Citizens committees exist within most school communities. Consideration should be given to engaging these committees to facilitate road safety initiatives. Of particular interest to the bus industry are the issues of driver distraction within the bus and the need for parents to be educated to meet their children on the same side of the road as the bus. These hazards contribute significantly to road incidents and accidents.

Information and education on bus safety should be provided to local communities with a coordinated and consistent message throughout NSW. BusNSW recommends that schools and local government place a stronger emphasis on the material included on the TfNSW "Safety Town" website. The promotion of this information, in conjunction with engagement with the local bus operator, would assist the community to better embrace safety messages. Key messages for parents include:

- Your primary aged child is still developing an understanding of danger and safety. While they are often keen to do things for themselves, an adult must always be responsible for your child in the traffic environment.
- Your child is most at risk just after getting off the bus. To reduce this risk, meet your child at the bus stop, never on the opposite side of the road.

BusNSW believes there is a need to consult with local bus operators when planning, designing or improving roads. In that context, road safety planning should include, as a minimum, an assessment of:

- access and egress for buses
- bus and passenger infrastructure criteria
- access for passengers with disabilities
- safety at bus stops
- passenger information
- road signage (including 40 kph when lights flash signs)
- appropriate barriers to protect passengers and pedestrians (this could be at school interchanges or at the roadside to stop passengers from crossing the road after alighting)

The provision of “*kiss and ride*” zones for parents dropping off or picking up school children, and the delineation of bus and car parking are also factors that should be considered as part of any road safety planning.

Buses should also be considered in government emergency plans to ensure that buses can assist in evacuating people from natural disasters (such as floods and bushfires). These plans should address emergency safety requirements, including “link road” strategies to identify access and exit routes to vulnerable areas and locations such as schools. Communication protocols between government and the private bus sector should also be developed.

Conclusion

In summary, BusNSW supports initiatives that create safer roads, speeds, people and vehicles. The NSW Government’s *Safer Roads Program* and delivery of road safety treatments via the *Saving Lives on Country Roads* and *Liveable and Safe Urban Communities* initiatives should be expanded to include specific public transport considerations. Priority for better education regarding public transport safety, the use of new vehicle technology and improved consultation with the bus industry provides an opportunity to influence driver behaviours and road safety in NSW.

BusNSW believes that engagement and partnership with the bus industry is one of the most effective ways of instituting changes to speed limits and road safety. Consultation with local bus operators represents an opportunity to tap into a wealth of local knowledge, with the ability to influence a large number of drivers, passengers, schools and parents.

As outlined above, BusNSW considers that the local bus operator should be involved in road safety discussions, as well as being informed of issues relating to the management of local roads. The location of bus stops and the introduction of new bus routes and other initiatives should form part of any strategic planning process for the local community. Planning and assessment of bus access and infrastructure should also be part of the council development application process.

Thank you for the opportunity to contribute to this important inquiry. If you would like to discuss these comments in more detail, please do not hesitate to contact me on (02) 8839 9500.

Regards,
Matt Threlkeld
Executive Director, BusNSW