

Trafinz submission on the Draft Safer Journeys for Rural Schools Guides

Prepared by John Gottler Vice President

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Introduction

Thank you for the opportunity to make a submission on the Land Transport (Road User) Amendment Rule 2011. We would appreciate the opportunity for further engagement in the development of the two guides.

About TRAFINZ

TRAFINZ (The Traffic Institute of New Zealand Inc) represents a wide grouping of NZ local authorities, covering the majority of the New Zealand population. Its membership includes regional councils, the major metropolitan cities and smaller provincial authorities as well as private sector and non-local government members.

TRAFINZ' Executive is comprised of elected councillors and officers, drawn from a cross section of the membership.

Submission

In developing this submission we have discussed the draft guides at a meeting of our Executive and circulated a draft submission more widely amongst our members.

Trafinz is highly supportive of our partners whose input into both of these documents highlight how critical transportation is to our NZ society and how unacceptable it is that our road transport system continues to fail our communities when children are killed or seriously injured on their routes to and from schools.

The Institute wishes to highlight the exceptional technical skills, experience, knowledge, financial and resource commitment provided by Auckland Transport staff and the NZTA's understanding of and commitment to the Safe System Approach, which Trafinz has been promoting since the 1990's.

However the Institute is concerned that so many key government safety partners do not appear to have contributed to these documents and may well not understand their important roles in this shared responsibility and their commitment to NZ communities by not being part of this vital work.

Namely:

- The Ministry of Education
- The Ministry of Health
- The Ministry of Transport
- The Ministry for Justice
- ACC
- NZ Police

We would encourage input from these organisations into the guides and make suggestions below about this.

Detailed Comments on the two Draft Documents

Safer Journeys for Rural Schools - Draft

1. Cover Page: the current NZTA standard for electronic signs on rural roads is for two signs (gateway effect). The cover photograph should show both signs. The 60 km/h display will be discussed further later
2. On page 6 under the bus safety section there is mention of unsafe bus stopping locations. There should be something in here about the Ministry of Education working with the local Road Controlling Authorities (RCA) in deciding on bus stop locations
3. 'Understand what is already planned for your school" the process is explained for schools who already participating in the school travel plan process. Further explanation needs to be given for schools that have not yet begun this process. Further, rural RCAs may not employ travel planners, and rural schools may not see any value in school travel planning
4. Throughout the document there is little mention of the Ministry of Education role. If a school decides that there are issues located within the school grounds, then the Ministry of Education will need to be involved as they own the land and would need to be involved with and fund any improvements
5. On page 22 of the document. the legal requirements for keeping a child in an approved restraint (including the 1 November law change) should be included
6. On page 100 the photograph illustrates everything wrong at a site. As for the location, the crossing for child pedestrians, i.e. high speed approaches, high speed right turn, and no footpath for pedestrians to cross to (general comment)
7. Speed Limits- There is a risk that this document can be discredited due to the variety of speed limits proposed to achieve outcomes for child safety, i.e. 20 km/h speed limit past stopped school buses, 40 km/h, 60 km/h, 70 km/h and part time speed limits in the vicinity of schools. While acknowledging that some of these are based on what seems to be a practical speed reduction in certain rural environments, are we enhancing and achieving

improved safety outcomes for children? Should we be considering a more consistent approach based on known survivability data for impacts at various speeds (refer figure 3.1)

8. The draft diagrammatically explains the process but does not inform the community of Government responsibilities for the transportation system so that the community can contribute to achieving safe journeys to and from schools
9. Section 3.6.4 Government: This section completely misinterprets Governments' Role as the investor, enabler, planner and legislator of vehicles, road environments and road users for NZ. Trafanz believes Government must invest in the complete transport system and cannot merely provide policy, advice, and vehicle standards, especially since a number of rural schools also fall on state highways.
10. What needs updating? There needs to be a statement or footnote at the beginning of the Guide explaining what is classed as a rural school

Safer Journeys for Schools: Guidelines for school communities - Draft

11. The toolbox for a school road safety system is almost exclusively comprised of engineering solutions. There needs to be more non-engineering solutions included, or at least move some of the non-engineering solutions to the start of this section.
The school, parents/caregivers and wider community need to take responsibility for some of the issues on rural roads. A large number of the vehicles on rural roads will be from the wider school community and so potentially causing these issues. Non engineering based solutions have proved successful in practice, and need to be highlighted to this audience, especially as they could be lower cost and easier and quicker to implement. There needs to be a strong and prominent focus on road safety education for children and the wider community. As well as engineering the roads to make it safer for children, children also need to be educated in taking responsibility for themselves and to not rely on every vehicle to slow down for them or even see them on the roads, especially in areas which may not been treated with engineering solutions.
12. In the School Road Safety Perception Survey under "Vehicle safety" there is mention about not wearing seatbelts, but no mention about the lack or incorrect use of child restraints. This should be added in, especially as from 1 November 2013 the age for children using booster seats increases to 7 years of age
13. In several places within the guide there is reference to those schools most in need or to "safety will be improved as resources allow". However the guide needs to ensure it does not raise the expectation that every rural school within a RCA's area will have their issues fixed. Funding is limited and potentially already allocated within a RCA for projects until at least the end of the 2013 financial year, and potentially further. Would it be worth having a footnote or explanation of how Council funding works?
14. On Page 6 under the paragraph "Identifying road safety risk in your school environment" there is a sentence which states that "effort can be targeted to the schools that need it most". However there is no explanation of how this is worked out and so how would a school know if they were one of the schools that "need it most"?

15. The role of setting appropriate speed needs to be linked to these documents as a key safer school journey issue concerning the vulnerability of our children within our communities

General comments that apply to both guides

16. More guidance information is required on the design of pick up/drop off places for parents driving cars
17. Rural parents of school age children are likely to be aware of the speed limit past stationary school buses. A national campaign is required to alert drivers in general.
18. Road safety messages should be included on the school website and social media sites the school uses
19. Road calming requires further explanation, e.g. appropriateness on high speed rural road

A suggested way forward

The transportation system is a complex interaction of people, vehicles and environments. Consequently all partners need to work collaboratively with local communities including schools to achieve positive transportation outcomes. While the bottom up approach has been successful it needs to be complemented with top down support and commitment to a transport system that does not fail by killing or seriously injuring children.

To assist this Trafinz recommends that the report be amended to include tangible roles for government safety partners within these documents. We suggest that the Government departments meet with the working group and Trafinz before finalising both documents. Some recommendations, as a starting point, are provided in the following bullet points:

- It is the role of the Ministry of Education to educate children and the community by supporting, funding, resourcing and collaborating road safety learning within the curriculum. The Ministry needs to ensure Safe System principles are fully understood so they can be applied by children and the community to achieve road safety outcomes.
- It is the role of the Ministry of Health to enable positive health outcomes for children and the community. The Ministry can share responsibility by contributing its considerable knowledge, skills, expertise, funding and resources. Investment into improving road safety outcomes for children today, particularly when coupled with the aim to encourage more active transport, would enable healthier communities in the future and significant health cost savings.
- It is the role of the Ministry of Transport to take responsibility for enabling a safe transport system, increasingly free of death and serious injury
- It is the role of the Ministry of Justice in this case to take responsibility for fair application of road and traffic laws

In addition a clear understanding of ACC and NZ Police's role in safe journeys to school needs to be part of this multi-faceted safe system approach. The Working Group may wish to develop this using the following as a starting point:

- It is the role of the ACC to take responsibility for injury prevention to children using any mode of transport within our roads. ACC as the NZ Insurer can enable communities by providing support, funding, engaging experts and specialist, providing crash research, undertaking in collaboration prevention initiatives, support to RCA's and align with the safe system approach and road safety strategy within New Zealand.
- It is the role of the NZ Police to enforce road rules, provide high quality incident reports and targeting enforcement to risk. Police's responsibility is also to challenge Government Agencies, in collaboration with the community, to change laws that do not align with the safe system approach or are not positively contributing to ensuring children are able to travel to and from school.

The Institute is available to assist the Working Group in the development of these documents. Trafinz offers its significant technical network and appreciates the opportunity to provide input into these new documents for schools.

Trafinz believes the documents once further developed can enable communities to proactively contribute to the development of a safe transportation system as we move to providing a transportation system that is increasingly free of death and serious injuries.

Cr Andy Foster
President
TRAFINZ – The New Zealand Traffic Institute

Contact details: c/o Wellington City Council andy.foster@wcc.govt.nz

021 227 8537