

**Submission by Rural Women New Zealand:
Land Transport (Road User) Amendment Rule [2011]**

24 June 2011

Road User Amendment Rules Team,

NZ Transport Agency,

Private Bag 6995, Wellington 6141

Rural Women New Zealand (RWNZ) represents the interests of rural families in New Zealand. It speaks for the 600,000 New Zealanders and over 200,000 households in rural communities, only 14% of whom are farming families on economic units. The other 86% of households include teachers, mechanics, mums, dads, students, grandparents, health and home care workers, seasonal workers, plumbers, administrators, truck drivers, vets, lifestylers and all the other vocations that make up rural communities.

Rural Women New Zealand makes submissions on issues relevant to its four portfolio areas of Education, Health, Land and Social issues.

Thank you for the opportunity to comment on the Land Transport (Road User) Amendment Rule [2011]. We are focussing our comments on the proposed speed limits around passing school buses and the use of optional lights. That is: the revoking of the current Clause 5.6(1) and the insertion of new subclauses; and amending Clause 8.4 by adding a new subclause.

Executive Summary

- **Rural Women New Zealand supports the broad thrust of this proposed change;**
- **We are pleased to note the proposed extension of the current rule to 20 seconds before the bus has stopped, and for 20 seconds after the bus has moved away ;**
- **We also note the importance of reducing speeds of drivers approaching and passing school buses, and urge that the signs feature the 20km/hr speed limit.**

- **We also call for stronger enforcement of the 20km/hr speed limit and the need for a driver education campaign;**
- **We strongly urge the uptake of ‘active’ signage; and**
- **The proposed wording around signs is somewhat limiting, and needs to be changed to allow for recent research and potential new active school bus signage.**

Supporting the General Thrust of the Proposed Change

Rural Women New Zealand has been working with several parties, over a number of years, on ways of making school bus trips safer for children. This is both an urban and rural issue, but we have focussed our attention on the needs of rural children, mainly because many bus stops in rural areas sit alongside open roads where speed limits are 70 to 100km/hr (where most fatalities occur). This is exacerbated by the secondary nature of many rural roads, which are inclined to be less straight, with resulting limited visibility.

Research¹ tells us that the greatest gains in child safety will come from changes to bus routes, better bus stops and other measures that remove the need for children to cross the road. In the absence of these measures the next most effective approach is to slow down the traffic when the children need to cross. This is because children of primary school age, in particular, are poor judges of vehicle speed, are impulsive, and caregivers cannot always be present when children need to cross the road.

As such, Rural Women New Zealand fully supports the intent of the rule change to create a ‘safety cocoon’ that warns other motorists they are approaching an area where children are likely to cross the road, and to slow down.

We Particularly Support the ‘20-Second Rule’

Altering the rule to require drivers to slow down to 20km/hr for 20 seconds before the bus stops to pick up or let off children, and 20 seconds after the bus has moved away from letting off/picking up children makes eminent practical sense. The driver has a longer time to be aware of the school bus and the need to slow for children, and the children have a longer time to be aware of an approaching vehicle.

Displaying active signage as the bus is coming to a halt will make drivers more aware that children are in the vicinity (either waiting to be picked up or about to disembark from the bus). Likewise, operating the sign for 20 seconds after the bus moves away again slows drivers down, making it more likely that drivers will notice any children waiting to cross the road after disembarking. This is when most accidents involving death or injury to children from a school bus occur.

¹ Baas, PH et al. (2010). “School Bus Safety.” NZ Transport Agency research report 408.

Educating Drivers About Speed

Rural Women New Zealand is actively campaigning to raise awareness of the 20 km/h limit. Our research shows that there is poor driver awareness of this Road Code rule. For this reason we believe it is vital that signage is approved for school buses that **feature the 20km/hr speed limit, through the use of active illuminated signs**, operated by the bus driver. Alongside this, there needs to be a **nationwide education campaign** for drivers.

Enforcement

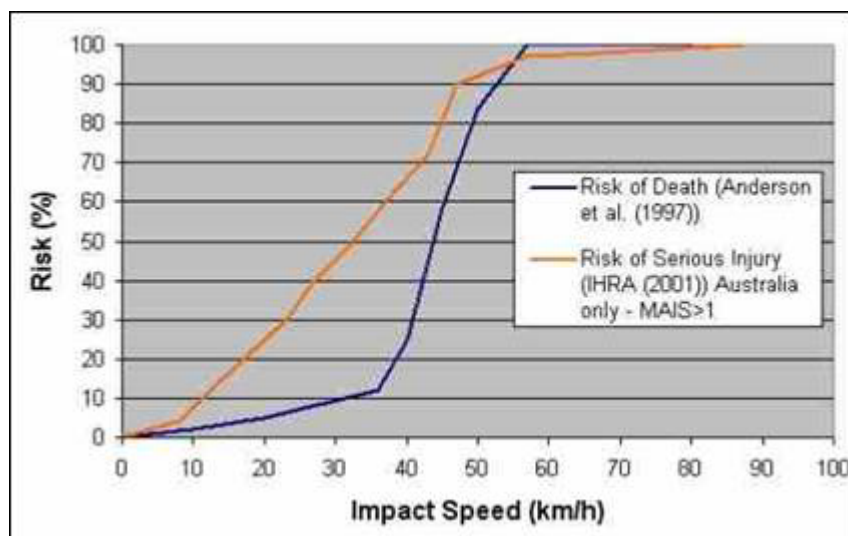
Rural Women New Zealand also wants to see **much more enforcement of the 20 km/h speed limit by Police**.

The ability to enforce the 20km/hr rule has been difficult to date, due to the fact that the current rule only applies when the bus is stationary and children are getting on and off. Extending the rule to 20 seconds before and after the bus has stopped will assist Police with practical enforcement of the rule.

Active' Signage

We strongly support the introduction of **new active (illuminated) signage** through the New Zealand Transport Agency's Signs Committee, and to update the official New Zealand Road Code to this effect.

Why is this so important? It comes down to saving lives. Research² has shown that the risk of death and serious injury increases markedly if a pedestrian is struck by a car travelling over about 30km/hr. Other research (cited in Archer, N et al. 2008) noted that human skull thickness and physiology have evolved to be able to survive an impact at our maximum running speed.



² Archer, J., Fotheringham, N., Symmons, M., Corben, B. (2008) The impact of lowered speed limits in urban and metropolitan areas. Monash University Accident Research Centre, Victoria, Australia. Accessed 27/08/2009. www.monash.edu.au/muarc/reports/muarc276.pdf

Other research³ notes that at 20km/hr a vehicle will be able to stop by breaking hard if a child steps out 11m ahead (about the length of a bus). At 40km/hr it takes 30m to stop, but at 60km/hr the car will still be doing 54km/hr 30m after they start breaking hard.

Consequently, Rural Women New Zealand urges that approved active signs for school buses should feature the 20km/hr speed limit. The figure below shows the type of sign that we are advocating.



And, we advocate a change of wording for Clause 8.4

Past published research has shown that ‘active’ illuminated bus signs **featuring a speed limit** are significantly more effective in reducing the speed of drivers approaching a school bus than either the current ‘School’ or ‘Kura’ sign or the approved active sign featuring two children crossing even when that sign includes wig wag lights.

We note that several versions of an active sign featuring the 20km/hr limit are being currently evaluated by Transport Engineering New Zealand (TERNZ) for their effectiveness. The results of this trial are currently being written up and will then be submitted to NZTA’s Signs Committee.

³ Baas, PH et al. (2010). “School Bus Safety.” *NZ Transport Agency research report 408*.

We understand results from this trial add further support to earlier published reports showing that an **active sign displaying a speed limit is much more effective** in terms of bringing about an average reduction in vehicle speed than the 'symbolic' sign of children crossing the road – even when that sign incorporates flashing lights.

Rural Women New Zealand therefore expects that new types of active illuminated signs for school buses featuring the speed limit will gain formal approval soon. Consequently, we suggest **changing** the proposed wording of:

“(3) The driver of a school bus displaying a specified school bus sign may operate the flashing lights on the sign only—“ to

“(3) The driver of a school bus displaying an approved active school bus sign may operate the sign only—“

Yours sincerely

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