

**Whole-of-Government Response
to
the Road Safety Committee report**

***Review of the Inquiry into Pedestrian
Safety in Car Parks***

February 2010

Victorian Government Response to the Inquiry into Pedestrian Safety in Car Parks

Response to Recommendations

Recommendation 1

That the Department of Justice inform and remind drivers of their obligation to report to Victoria Police pedestrian crashes that occur in car parks.

This recommendation is supported in principle

The Government supports the principle that drivers are made aware of their responsibilities with regard to reporting crashes to Victoria Police.

However, the Government considers that there is already a good level of awareness of reporting requirements when it comes to crashes and injuries. Of particular relevance in this context is the VicRoads "Road to Solo Driving" handbook, which is used by drivers applying for their licence. This handbook provides clear guidance to drivers of their responsibilities when involved in a crash.

Recommendation 2

That WorkSafe Victoria informs and reminds the owners and operators of car parks of their obligation to report incidents where pedestrian crashes occur.

This recommendation is supported

The criteria for the reporting of incidents under the OHS Act are readily available through a variety of mediums including the internet and publications. WorkSafe will continue to promote and raise awareness of the duty to notify incidents and ensure that duty holders are clear on reporting requirements. This will be undertaken through industry newsletters, industry forums, the WorkSafe website and other traditional forms of communication.

Recommendation 3

That Victoria Police, the Transport Accident Commission and WorkSafe Victoria ensure they capture appropriate information concerning pedestrian crashes in car parks and amend their data systems to allow accurate reporting.

This recommendation is supported in principle

Actions will be taken to enhance the quality of road crash data.

Victoria Police is amending its systems to provide linkage of TAC claims data with crash data which should enhance the quality of available data concerning pedestrian crashes in car parks. The TAC is supporting Victoria Police in their system enhancements to improve the linkage of crash and TAC claims data. In addition, the TAC will investigate improvements that can be made to the extraction of data from text based information provided on TAC claim forms.

The current WorkSafe data system captures, and is capable of reporting, incidents which meet the "notifiable" criteria or result in a workers compensation claim. WorkSafe is considering the development of a new incident system to broadly enhance reporting and data analysis, however this remains in the scoping and feasibility phase.

Recommendation 4

That VicRoads amend their CrashStats website to ensure that car park related data be publicly available to municipalities and developers, so they can assess the relevant data on car parks and areas for proposed car park development or redevelopment in their jurisdiction.

This recommendation is not supported

Car park crash data indicate only that a crash occurred in a car park, not what part of the car park it occurred in, such as bays, loading zone, etc. As a result, there are limited benefits in the use of car park crash data as an input for proposed car park development or redevelopment.

In contrast, there are Codes of Practice and Guidelines which are readily available to assist municipalities and developers in the assessment and design of car parks. Notably, the Austroads AGTM11-08 Guide to Traffic Management Part 11: Parking provides guidelines with respect to pedestrian safety. Section 6.5.2 relates to pedestrian treatments and outlines the principles that should be considered as part of the parking facility planning to allow for the safe interaction of vehicles and pedestrians.

Recommendation 5

That the Department of Planning and Community Development should amend the Victorian Planning Provisions to encourage improved pedestrian safety within car parks, by:

- a) Taking into account the recommendations from this Inquiry prior to the release of their response to the review of Clause 52.06 in *Review of Parking Provisions in the Victorian Planning Provisions*.**
- b) Placing greater emphasis on pedestrian safety and include measures to improve such safety, in both the revisions to Clause 52.06 and to its related design guides under Clause 19.03.**

This recommendation is supported

The Department of Planning and Community Development's current review of Clause 52.06 is generally consistent with the findings of the Parliamentary Committee. The revisions to Clause 52.06 will include new design considerations that increase recognition of pedestrian safety in the design of car parks.

Recommendation 6

That the Department of Planning and Community Development amend the Victorian Planning Provisions to allow Councils to provide concessions to developers who provide a car park with fewer parking spaces but incorporates pedestrian-friendly measures. That any monies received by Councils under the cash-in-lieu schemes from those car park developments that do not provide pedestrian friendly features should be invested in retro fitting pedestrian safety improvements to older Council car parks.

This recommendation is supported in part

The car parking provisions currently allow safety considerations to be balanced against issues of parking supply. The revised provisions considered in Recommendation 5 above will strengthen this aspect of controls by more explicitly recognising the importance of pedestrian safety.

Councils will be encouraged to structure "cash-in-lieu" schemes so as not to penalise developers where spaces are waived to allow for better design. The use of revenue raised by "cash-in-lieu" schemes to improve safety in existing car parks is problematic because funds can only be allocated to Council-funded parking facilities that will compensate for that shortfall.

Alternative approaches to addressing this recommendation will be investigated by the Department of Planning and Community Development.

Recommendation 7

That the Department of Planning and Community Development lobby Standards Australia and Austroads to have greater emphasis placed on pedestrian safety included in the next versions of the relevant Australian Standards for Off-Street Parking and Austroads guide to parking.

This recommendation is not supported

Standards Australia and Austroads develop standards based on technical requirements. Although it is not appropriate for the Department of Planning and Community Development to "lobby" Standards Australia and Austroads about the content of these documents, the Committee's report, highlighting the relevant sections, will be sent by the Department of Planning and Community Development to these organisations for their consideration.

Recommendation 8

That the Department of Planning and Community Development incorporate new guidelines and recommendations in the Victorian Planning Provisions to promote the following measures in the design of new or upgraded car parks:

- a) Safe design layouts including appropriate sightlines, parking spaces and safe integration with the surrounding road and pedestrian path network;**
- b) Separation of loading bays from car parking and pedestrian areas;**
- c) Separation of pedestrians and vehicles where possible, especially at entrances and exits with bollards and other devices;**
- d) Car parks to be designated Shared Zones where appropriate;**
- e) Controlling speed through engineering design;**
- f) Signage and surface markings consistent with the broader road network and subject to VicRoads consent, and**
- g) Providing adequate lighting.**

This recommendation is not supported

Including guidelines about car park design, including technical engineering specifications, urban design considerations, and broader safety considerations such as lighting and surveillance in the VPP is not appropriate because these are not planning issues. These issues would be adequately addressed by introducing guidelines at the engineering and building stages. Introducing this to land-use planning would duplicate existing processes,

introduce unnecessary regulatory burden and impose an assessment of issues that planners are not trained or qualified in.

The Activity Centre Design Guidelines and the Safer Design Guidelines for Victoria currently inform car parking design. Future work by the Department of Planning and Community Development could include supplementary documents of this kind that would address pedestrian safety in further detail.

Recommendation 9

That VicRoads together with WorkSafe Victoria run a publicity campaign on Shared Zones in car parks.

This recommendation is supported in principle

The Government notes that the incidence of pedestrian casualties in car parks is relatively small. Given the relatively small contribution to the road toll, the presentation of a dedicated publicity campaign could not be justified, particularly as many car parks are not designated shared zones.

Car park safety will be considered in any future shared zone promotion.

Recommendation 10

That the Department of Planning and Community Development review the upcoming guidance on loading bay areas from WorkSafe Victoria and if required, lobby for increased emphasis on the separation of car parking facilities from loading areas in the Australian Standard, *Parking Facilities – Part 2: Off-Street Commercial Vehicle Facilities*.

This recommendation is supported in principle

WorkSafe is currently developing a project dealing with loading bays as part of its supply chain strategy. Documentation will be made available to the Department of Planning and Community Development for further review. Any comments from, or issues raised by, the Department of Planning and Community Development will be considered by WorkSafe for incorporation into future strategies.

Recommendation 11

That the Department of Planning and Community Development liaise with VicRoads, Victoria Police, the Transport Accident Commission, WorkSafe Victoria, the Municipal Association of Victoria, municipalities and relevant developer bodies, to produce a Checklist for Safe Design for pedestrian safe car parks. Such a Checklist should represent best practice in the safe management of pedestrians and set out the key basic principles for designing a safe car park.

This recommendation is supported in principle

Car parking design involves integrating a number of different considerations in addition to pedestrian safety. Developing a checklist would be a substantial project that would require resourcing. The feasibility of producing a checklist will be investigated by Department of Planning and Community Development with VicRoads, Victoria Police, the Transport Accident Commission, WorkSafe Victoria, the Municipal Association of Victoria, municipalities and relevant developer bodies. Many car parks will not need planning approval so the ways by which a checklist could be applied will also need to be considered.

Recommendation 12

That the Department of Planning and Community Development require a safety audit incorporating pedestrian safety, to be conducted for all car parking planning applications to municipalities to ensure adequate pedestrian safety.

This recommendation is not supported

The requirement for a safety audit for all car parking planning applications is likely to result in significant regulatory burden because car parking applications vary considerably in their complexity.

How an audit would be applied and balanced against other design considerations would be complex, as would the establishment of the audit tests. The road safety benefit resulting from this process is unlikely to justify the resources required.

Recommendation 13

That WorkSafe Victoria investigates the adoption and expansion of the Melbourne Car Park Accreditation Scheme state-wide.

This recommendation is not supported

Whilst the accreditation scheme is not the responsibility of WorkSafe, such programs are recognised as providing a systematic approach to improving systems of work.

The Government understands this scheme was developed by Melbourne City Council and Victoria Police and currently runs only in the Melbourne City Council area. The Government will refer this matter to the Municipal Association of Victoria for its consideration.

Recommendation 14

That WorkSafe Victoria act as the lead agency in relation to ensuring increased pedestrian safety in car parks, liaising with relevant partners to create a safe environment in car parks.

This recommendation is not supported

With the number of agencies and stakeholders potentially involved in the formation of a working party to improve pedestrian safety in car parks, the Government is of the view that central coordination is unnecessary as each agency and stakeholder deals with car park safety where ever it is part of the organisations responsibilities.

Recommendation 15

That WorkSafe Victoria develop a Safe System approach to car parks and pedestrian safety in collaboration with VicRoads, the Transport Accident Commission, Victoria Police, the Department of Planning and Community Development, and all municipalities along with the operators, owners and developers of car parks.

This recommendation is not supported

The development of a Safe System approach would require a broad commitment by all stakeholders for little road safety benefit compared with current approaches.

Campaigns identifying WorkSafe as the responsible agency for a component of pedestrian safety would complicate and dilute the message from other government departments.

Recommendation 16

That WorkSafe Victoria, through policy guides and other education efforts, continue to encourage and remind the owners and operators of car parks of their responsibilities in providing a safe environment for pedestrians. This would include the safe design of car parks along with efforts to adequately supervise and proactively assess risks in car parks.

This recommendation is supported in principle

WorkSafe will continue to promote safety in all workplaces through education, policy and enforcement. There are no specific car park related materials planned for development in the current business cycle.

Recommendation 17

That WorkSafe Victoria, through its policy guides and other education efforts, encourage employers to include specific guidance on safe driving within car parks to their employees.

This recommendation is supported in principle

WorkSafe in conjunction with TAC has developed publications on safe work related driving. These provide information on how to develop work-related driving safety policies and help employers, fleet managers and drivers with light fleet vehicles to improve their work related driving safety. These publications relate to all aspects of driving and future editions may consider the recommendations of the Committee to include car park specific guidance.

Recommendation 18

That the Department of Treasury and Finance should promote driving safely within car parks in its *Whole-of-Government Standard Motor Vehicle Policy*.

This recommendation is supported

The Department of Treasury and Finance will amend the Whole-of-Government Standard Motor Vehicle Policy to promote drivers of government vehicles driving safely when in car parks.

Recommendation 19

That VicRoads investigate the incidence of older drivers involved in car park crashes in order to provide appropriate guidance in their older driver licensing and education efforts.

This recommendation is supported in principle

When the Victorian Older Drivers' Handbook is next reviewed, consideration will be given by VicRoads to including pedestrian safety in car parks.