

[REDACTED]  
Executive Director Transport Policy  
Safety, Policy, Environment & Regulation  
Transport for NSW

[REDACTED]  
CC: roadsactfeedback@transport.nsw.gov.au

28 March 2025

Dear [REDACTED]

I refer to your recently announced consultation process concerning the review of the NSW Roads Act 1993.

The Office of Transport Safety Investigations (OTSI) undertakes investigations into incidents and accidents involving public transport services, many of which occur on NSW Roads.

In the course of undertaking these investigations, opportunities have been identified to improve safety for all road users, including users of other transport modes that interface with roads.

Safety, Risk and Asset Management processes have evolved considerably since the Roads Act was created in 1993 including the Safe Systems Approach as outlined in your consultation document.

OTSI is of the view that safety management on our roads could be strengthened through the incorporation of contemporary risk management approaches to improve safety for all road users, whether they be drivers, passengers or active transport participants.

Specifically, OTSI would like to see a new Roads Act and associated instruments clarify the obligations of Road Authorities in areas such as:-

- Introducing the concept of reasonable practicality on designers and asset managers of roads when considering risk treatments to ensure infrastructure design is safer for all users
- Obligations around interface coordination between rail infrastructure and public roads – possibly reflecting the obligations on road authorities already in s107 Rail Safety National Law to reinforce requirements and ensure safety
- Design of T ways particularly where they interact with other road users
- Ensure the location and design of bus stops and interchanges is more responsive to the needs of vulnerable people such as school children and the disabled.

OTSI appreciate the opportunity to provide input on this review. OTSI has formed the above views based on a significant body of evidence collected in the course many investigations.

Yours sincerely



**Jim Modrouvanos**  
CEO & Chief Investigator



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