

ACRS Submission on South Australia's Engineering Requirements for Land Division – Stage 2 consultation



About the Australasian College of Road Safety

The Australasian College of Road Safety was established in 1988 and is the region's peak organisation for road safety professionals and members of the public who are focused on saving lives and serious injuries on our roads.

The College Patron is Her Excellency the Honourable Sam Mostyn AC, Governor-General of the Commonwealth of Australia.

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21 May 2026

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Introduction

The Australasian College of Road Safety is the region's peak membership association for road safety with a vision of eliminating death and serious injury on the road. Our members include experts from all areas of road safety including policy makers, health and transport professionals, academics, community organisations, researchers, federal, state and local government agencies, private companies and members of the public. The purpose of the ACRS is to support our members in their efforts to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy. Our objectives include the promotion of road safety as a critical organisational objective within government, business and the community; the promotion and advocacy of policies and practices that support harm elimination; the improvement of relative safety outcomes for vulnerable demographic and user groups within the community; the promotion of post-crash policies and practices; and the promotion of a collegiate climate amongst all those with responsibilities for and working in road safety.

The ACRS believes that we should prevent all fatal and serious injuries on our roads; the road traffic system must be made safe for all road users; system designers should aim to prevent human error and mitigate its consequences; life and health are not exchangeable for other benefits in society; and that all ACRS policy positions must be evidence based.

Engineering Requirements for Land Division

This is the second stage of consultation, following a comprehensive review of the initial draft engineering design standard and associated documents released for consultation in May 2025.

ACRS response to the draft Engineering Requirements for Land Division documents

This submission follows the submission made by the Australasian College of Road Safety (ACRS) on the first round of consultation in July 2025.(1) As the peak membership association for road safety professionals, advocates, and members of the public focused on eliminating fatal and serious injuries on our roads, the ACRS is committed to ensuring that new urban development contributes positively to road safety outcomes for all road users. We continue to reiterate all points made in our July 2025 submission and note the following based on the updated documents made available for public engagement during April-May 2026.

a) Current Context: The Reality of Road Trauma in 2026

South Australia has recorded a tragic start to 2026, with more than 40 people killed on the state's roads before reaching the end of April.(2) We are less than one-third of the way through the year, yet well over half way towards passing the target of fewer than 67 people killed in 2027 in accordance with South Australia's Road Safety Strategy to 2031, which aims for a 50% reduction in people killed on South Australian Roads by 2030 compared to a three-year average baseline of the years 2018-2020.(3) Recent reporting by the RAA noted that South Australian roads were 'deadlier than any other state to start 2026'.(4) If this trajectory continues, the state is projected to record well over 100 fatalities by year's end.

This outcome represents a significant divergence from the state's 2030 Vision Zero targets and underscores the urgent need to prioritise harm elimination in all planning and infrastructure decisions.

b) Continuity of Advocacy: The 2025 ACRS Submission

In July 2025, the ACRS provided a detailed submission in response to the initial consultation on the 'Engineering Requirements for Land Division'. That submission highlighted severe risks associated with legacy road design conventions, particularly the adoption of high design speeds in residential streets. The State Planning Commission was formally advised that prioritising vehicle movement over the safety of vulnerable road users in local environments directly conflicts with contemporary urban planning and road safety practice.

c) Assessment of the 2026 Draft Documents

A review of the 2026 'Draft Technical Manual' and 'Draft Design Standard 1' reveals that while some peripheral additions have been made, the core safety concerns remain unresolved.

It is encouraging that Section 6.2.4 of the Technical Manual now explicitly mandates that road design must incorporate the principles of active transport as outlined in South Australia's 'Active Travel Design Guide'.(5)

However, a critical contradiction persists. While the manual directs designs to 'prioritise safe, direct and convenient movement for people walking, wheeling and cycling', it simultaneously retains a 60 km/h design speed for a standard 'Residential Road'. Directing vulnerable road users into environments deliberately designed for 60 km/h vehicle speeds presents an operational paradox and fundamentally fails to provide a safe system.(6, 7)

Furthermore, the 2026 draft documents continue to omit several practical design interventions advocated for by the ACRS in 2025. Despite the newly added references to active travel, there is still no structural embedding of the Movement and Place framework to guide spatial allocation.(8) The manual also continues to rely on legacy geometric intersection designs, such as maintaining wide corner radii to accommodate heavy vehicles at speed, rather than transitioning to Safe System infrastructure like raised safety platforms or mountable kerb aprons.

The draft manual concerningly now introduces the use of 'deflected tee' intersections. These counterintuitive treatments fundamentally contradict the principle of self-explaining roads,(9) generating driver confusion and elevating risk for vulnerable road users. The recent necessity to mandate additional, explicit signage for these junctions within both AS1742.2 and DIT guidelines exposes them as inherently flawed designs. They are an ineffective substitute for genuine traffic calming and are incompatible with Safe System principles. Similarly, practical mechanisms to physically reinforce pedestrian priority, such as continuous footpaths across driveways, remain absent from the design standards.

d) Duty of Care and the Widely Accepted Standard of Care

The ACRS raises this point out of a profound concern for the professional and institutional exposure that may arise from the current drafts. The established benchmark for best practice in road safety is widely accepted across Australian jurisdictions and has firmly moved away from legacy geometric standards. Contemporary guidance – including the recently updated Austroads Guide to Road Safety Part 3: Safe Speed Management (latest version published February 2026) – is embedded in Safe System principles and explicitly links design speeds above 30 km/h in residential areas to a highly foreseeable risk of severe trauma.(10) This is in line with evidence-based international best practice(11-13)

This is not an isolated perspective, with a national shift towards these safer speed environments occurring in recent years. For example, Infrastructure Victoria has recently been engaging the public to inform community discussion regarding the adoption of 30 km/h speed limits for local streets.(14) We caution that formally mandating standards that contradict this widely accepted evidence base may inadvertently expose the Department for Housing and Urban Development and its authors to future scrutiny regarding duty of care, whilst simultaneously transferring the moral and legal risk of foreseeable harm onto local councils who will be forced to manage these assets.

Conclusion and Recommendations

While these specific interventions were detailed in our 2025 submission, their ongoing omission in the 2026 drafts necessitates their reiteration. To ensure that new land divisions do not bake systemic trauma into South Australian communities, the ACRS reiterates the critical need for the following revisions:

1. **Mandate 30 km/h Design Speeds:** Reduce the maximum design speed for all lower-order residential streets to 30 km/h to align with human impact tolerance levels.
2. **Embed the Movement and Place Framework:** Explicitly integrate this framework to guide spatial allocation and ensure streets function safely as public spaces, not just movement corridors.
3. **Mandate Safe System Infrastructure:** Replace legacy geometric intersection designs with explicit guidance for a broader suite of Safe System treatments, such as raised intersections, raised safety platforms, and tightened corner radii. Furthermore, explicitly prohibit the use of counterintuitive 'deflected tee' intersections on any road accommodating through-traffic, as they fail to provide safe and effective traffic calming.
4. **Reinforce Pedestrian Priority:** Mandate continuous footpaths across residential driveways to structurally reinforce the right-of-way for active travel users.

The current trajectory of road trauma in South Australia demands a definitive shift away from legacy design conventions. We cannot continue to repeat historical planning mistakes that entrench car-centric road networks, which not only contribute to unacceptable levels of death and serious injury but also create profound physical barriers for vulnerable road users and those unable to drive. By embedding Safe System principles, the Department can fulfil its duty of care, mitigate future liability for local government authorities, and ensure new subdivisions are inherently safe, accessible, and equitable for all members of the community.

Please do not hesitate to contact us should you require any further information.



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