

ACRS Submission – NSW Tolling Review



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 His Excellency General the Honourable David John Hurley AC DSC (Retd), Governor-General of the Commonwealth of Australia.

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Introduction

The Australasian College of Road Safety (ACRS) 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 College 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 College 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 College policy positions must be evidence based.

In this submission, ACRS explain how:

- Road commuters (light and heavy vehicles) should be encouraged to use roads designed for the *movement* of people and goods, and away from *places* such as suburban streets where local residents go about their daily lives.
- There are alternatives to toll roads to support safe travel - a system-wide approach is needed to ensure viable public transport and active transport options (sustainable development goals)
- Toll roads (motorways and tunnels) and alternative (free) routes should be assessed and given a star-rating based on the level of safety built into the road. This is to help people and organisations prioritise safety.

ACRS response to the Terms of Reference

Toll roads provide motorway conditions, the promise of reduced wear and tear on vehicles, and a safer journey due to a range of factors such as the elimination of cross traffic crashes associated with traffic light-controlled intersections, variable speed controls, incident response times, maintenance and operations of these roads. An unpublished report (funded by Transurban) by the Monash University Accident Research Centre found that the incidence of fatality and serious injury crashes on Transurban operated roads (toll roads) throughout Victoria, Queensland and New South Wales, was half that occurring on similar roads.(1)

Drivers who avoid toll roads are, sometimes through necessity, required to prioritise cost over safety. That is, toll road charges can act as a safety disincentive and can exacerbate financial disadvantage.

The Terms of Reference for this review discusses how “current arrangements do not reflect a system-wide approach Road Tolling”.(2) The ACRS believes that the “system” is not just about roads and private vehicles but includes all modes of transport that can support mobility, in public transport and active transport. This is evidenced through the United Nations Sustainable Development Goals and the Second Decade of Action for Road Safety, which inexorably links road safety and sustainable mobility:

Road safety requires addressing broader issues of equitable access to mobility and that the promotion of sustainable modes of transport, in particular safe public transport and safe walking and cycling, is a key element of road safety.

UN General Assembly Resolution – Second Decade of Action for Road Safety(3)

Movement and Place

Movement and place is a framework which recognises that the planning, design and management of streets and roadways on the transport network needs to maximise benefits for the people and places they serve.

The Movement and Place approach recognises roads and streets serve dual functions as essential corridors for moving people and goods, and important public spaces where life unfolds...Motorways and movement corridors provide for fast movement with little or no ‘place’ function, whereas in vibrant streets, local streets, and places for people...the emphasis is on slow movement, and place is the primary consideration.

Speed management through the Movement and Place Approach, Fact Sheet
National Road Safety Strategy 2021-2030(4)

Toll roads and motorways are designed for the *movement* of people and goods and have a higher speed limit.

Alternatives to toll roads are more likely to be *places*. These places feature suburban strip-shopping centres, 40km/h school zones, multiple sets of traffic lights, residential areas, aged care homes, early learning centres, places of worship, parks, playgrounds, sporting fields, licensed premises, and other local community facilities. Speed management principles need to reflect that they are not the sole domain of passing commuters, be they in heavy or light vehicles.

As such, encouraging light and heavy vehicles onto toll roads whose travel purpose is around *movement* has the potential to achieve sustainable development goals, reduce road trauma and improve safety, air quality, and amenity in suburban streets affected by toll-avoiders.

Alternative travel to toll roads

The issue of toll roads is not confined to those who elect to pay the toll and those who do not. Both the toll road/motorway and alternative (free) routes form part of a broader transport network. Of most concern is these alternative routes may be *places*, which should be aiming to prioritise people and amenities over large volumes of vehicle movements. By moving drivers away from toll roads, the impact is they use potentially poorer quality, highly congested alternative *place* routes, which may increase crash risk.

The ACRS believes that to combat this problem, one key driver must be to support greater use of the public transport system. According to current public transport ridership data,(5) capacity exists within the public transport system, to divert toll road users onto public transport through discounts or other incentives.

Whilst ridership has increased in the past 12 months, a comparison of April 2023 to April 2019 shows passenger figures are significantly lower now than before COVID-19.

Monthly Trips by Operator - Comparison between April 2023 and April 2019

	Select month	Base month	Difference	Difference %
NSW Trainlink (Intercity)	2,041,582	3,333,602	-1,292,020	-38.8%
Sydney Trains	19,275,247	26,769,856	-7,494,609	-28.0%
Grand Total	21,316,829	30,103,458	-8,786,629	-29.2%

Open-source data

Key points:

- Monthly trips in 2023 are still 29% below pre-COVID levels.
- On rail lines roughly adjacent to tolled motorways, monthly trips in April 2023 (compared to April 2019) are:
 - 33% lower on the Western line (Adjacent toll road - M4 motorway)
 - 32% lower on the South and Airport lines (Adjacent toll road - M5/M8)
 - 40% lower on the Central Coast and Newcastle lines (M1 and Pacific Hwy or adjacent toll road - Northconnex/M2)

With regard to trains, despite new housing developments approved and/or under construction in areas such as Appin, Menangle and Wilton, ACRS is unaware of any plans by the government to extend the Sydney electric train network beyond Macarthur railway station, which opened some 40 years ago.

Without viable public transport alternatives, the use of multiple private motor vehicles will be the sole option for new households in these areas. Safe and sustainable mobility, including active transport, must be a core feature of new housing developments and a 'system-wide approach'.

Prioritising Safety

Motorists, be they car owners, motorcyclists, or the operators of commercial fleets, need the help of government, road authorities, motorway operators, and insurers, to be better informed about safe route selection.

ACRS advocates for the publication of infrastructure safety star ratings, to promote better community understanding of safety issues (including speed management) and advocate for more safety infrastructure investment.(6)

Star Ratings are an objective measure of the level of safety which is 'built-in' to the road through more than 50 road attributes that influence risk for vehicle occupants, motorcyclists, bicyclists, and pedestrians.(7) Tolled roads should be assessed for their star ratings and the results published.

In addition to assessing the safety of toll roads, the safety star rating should also be ascertained, and published, for such alternative/free routes. This would help motorists to prioritise safety.

Further Reading

The 2021 ACRS submission to the NSW Legislative Council Tolling Review contains further discussion on many of the points contained in this paper. It can be found at: <https://acrs.org.au/wp-content/uploads/ACRS-NSW-Submission-2021-Tolling-Review-final.pdf>.

Conclusion and recommendations

The ACRS appreciates the opportunity to make this submission and contribute to a improving road safety. We are particularly keen to highlight:

- Road commuters (light and heavy vehicles) should be encouraged to use roads designed for the *movement* of people and goods, and away from *places* such as suburban streets where local residents go about their daily lives.
- There are alternatives to toll roads to support safe travel - a system-wide approach is needed to ensure viable public transport and active transport options (sustainable development goals)
- Toll roads (motorways and tunnels) and alternative (free) routes should be assessed and given a star-rating based on the level of safety built into the road. This is to help people and organisations prioritise safety.

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



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