

# ACRS Submission on South Australia's Transport Strategy early engagement



## ***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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## 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 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; that system designers should aim to prevent human error and mitigate its consequences; that life and health are not exchangeable for other benefits in society; and that all College policy positions must be evidence based.

### South Australia's Transport Strategy

South Australia's Department for Infrastructure and Transport (DIT) are developing a Transport Strategy to outline the 30-year vision for the state's transport network, and transform how people and goods move around the state. The strategy will cover all forms of transport, from cycling, driving and walking to public transport and freight. It will also align to other key state priorities, like the Greater Adelaide Regional Plan, so we can maximise the benefits of other changes happening in South Australia.

According to the Transport Strategy Fact Sheet(1):

*(DIT) want your feedback to help us finalise the Transport Strategy.*

- *When you think about transport in our state, what is important to you?*
- *How do you think we should live 30 years from now?*
- *How should people and goods move around?*

The ACRS welcomes the opportunity to make this submission. We recognise that this early phase of public consultation is to support the initial development of the Transport Strategy, and that the current supporting information is high-level in nature. Therefore, our feedback is targeted towards the draft Vision Statement, key focus areas and the high-priority road safety issues identified by the College.

The College also welcomes any opportunity to discuss our submission in further detail to assist in the preparation of the Transport Strategy.

## The role of road safety in the Transport Strategy

The College strongly contends that road safety must be the primary guiding action of the Transport Strategy. Whilst it is acknowledged that South Australia's Road Safety Strategy to 2031(2) and its supporting Action Plan(3) outline the state's commitment to Vision Zero targets and how they will be met, the Transport Strategy has a vital role in directing how a zero-harm transport network will be achieved by 2050.

In addition to Vision Zero's ultimate target of achieving no deaths or serious injuries on our roads by 2050, *South Australia's Road Safety Strategy to 2031* also commits to a target of at least a 50% reduction in lives lost and at least a 30% reduction in serious injuries on South Australian roads by 2031.

Unfortunately, road trauma rates in South Australia are not trending in the right direction to meet the 2031 target, especially when considering the tragic levels of road trauma experienced in 2023 on South Australia's roads where 117 people were killed (the worst year since 2010) and 824 people were seriously injured (the worst year since 2021 and the third highest level experienced over the previous 12 years). The 2024 target of less than 76 fatalities and 623 serious injuries will also not be met with the SA community having already suffered 81 fatalities and 789 serious injuries to 12<sup>th</sup> December 2024.(4)

It is therefore abundantly clear that to have any chance of meeting the 2031 and 2050 Vision Zero targets that South Australia has committed to, **radical change is required** in the way the transport system is planned, designed, operated, maintained, and managed.

Without the radical change that is necessary we are currently on track to see almost **3,000 people** killed and more than **20,000 people** seriously injured on our state's roads over the 30-year horizon of the Transport Strategy.

These levels of trauma are clearly not compatible with any notion of "liveability".

We draw further attention to the "Principles for decision making and investment" outlined in *South Australia's Road Safety Strategy to 2031*, which states that "road safety will be a key criterion in all decision-making frameworks for investment decisions and policy setting".(2) We note that the document also states that these principles "will guide the South Australian Government's decision making on transport related investments, policy setting, programs and initiatives".

Beyond the human trauma, it should also be acknowledged that poor road safety is also a burden to the economy and the health system, with the annual cost to the Australian economy approaching \$30 billion, of which the estimated to cost South Australia being \$2.14 billion annually.(5)

Recent research commissioned by Austroads indicates that up to 90% of fatal and serious injury crashes currently being experienced on Australia's roads could be eliminated through the application of interventions that are available today.(6) Even if we only achieve 'almost zero' people being killed or seriously injured on our roads by 2050, the benefits are vast.

The Transport Strategy must therefore abide by *South Australia's Road Safety Strategy to 2031* to include road safety as a key criterion for investment decisions and policy setting, and outline the tangible measures required to transform South Australia's transport system, equipped with the knowledge that up to 90% of fatal and serious injury crashes could be eliminated with currently available remedies.

## Transport system governance

Different participants within the road system hold different levels of authority, responsibility and power, and this hierarchy of control should be designed such that those participants with more influence in the decision-making process are accountable to a commensurate degree.

The South Australian government has a role in leading and making investment decisions that provide value for effort, are cost effective, and timely. This leadership role should also be applied to bringing about change across both local government and the private sector to design, develop and maintain a road system that is safe for all road users – in addition to encouraging safe active travel and contributing towards emissions reductions through fewer people wanting or needing to drive.

The College considers that every decision made regarding how we design, build and manage our transport system is an occasion with the potential to establish the safe movement of people and goods with health and wellbeing being inherent in the system. A systems thinking approach is required, which builds on the Safe System approach adopted by many countries to reduce road trauma.(7) The College's policy position statement on A New Systems Thinking Approach to Road Safety can assist understanding and provide guidance on how to incorporate this approach for South Australian government policy.(8)

The Transport Policy must therefore acknowledge the South Australian government's leading role and accountability in road safety outcomes, as holders of the highest levels of authority and power over the system. This primary level of leadership vitally needs to extend across multiple portfolios including transport and infrastructure, law enforcement and justice, land use planning, health and human services. The South Australian government must also exercise the required stewardship to lead other participants involved within the transport system such as local government, research institutions and private enterprise.

We also note South Australia's commitment to ensure that at least 80% of travel occurs on roads with a 3-star AusRAP rating or higher by 2030, which should be acknowledged in the Transport Strategy.

## Speed in the transport system

There is a comprehensive and unequivocal body of evidence linking excessive vehicle speed with high levels of road trauma. The College's policy position statement on Speed Management states that(9):

*There are three main problem areas for speed management. First, high speed roads where, if a crash occurs, impact speeds will invariably result in the most serious casualty outcomes. Second, multipurpose roads where potentially high-speed vehicles encounter more vulnerable non-motorised road users such as pedestrians and bicyclists. Third, motor vehicles being driven/ridden too fast for the conditions.*

Whilst engineering solutions such as road infrastructure upgrades (e.g. installation of roundabouts, provision of safety barriers, etc.) and advanced driver-assistance systems (ADAS) on vehicles can contribute towards harm reduction, it is simply unfeasible to rely only on these countermeasures to meet our Vision Zero targets. This is because it is not possible to provide gold-standard safety infrastructure across our entire road network, nor can we wait for new vehicle technology to penetrate South Australia's vehicle fleet (SA has an average fleet age of over 12 years) which also cannot be relied upon to prevent all crashes.

The implementation of effective speed management needs to be the first step, noting that speed limit reductions are one of the single most cost-effective countermeasures for reducing death and serious injuries on our roads.(10)

Furthermore, numerous modelling studies have shown that it will not be possible to achieve our Vision Zero goals without some level of speed limit reform.(6, 11) In acknowledging this, and the ease of implementation, the moral response should be to enact speed reform as soon as possible, so that the associated trauma benefits can be realised straight away.

In addition to speed management, investment into the upgrade and maintenance of South Australia's roads needs to make harm-reduction the highest objective. For example, the recent completion of Stage 1 of the Main South Road duplication project between Seaford and Aldinga has achieved significant safety improvements through the provision of separated carriageways with wire-rope barriers installed in the median to reduce the potential for high-severity crashes whilst maintaining a high-speed environment. However, the fact that this project has allowed opportunities for right-turn movements at some side-road intersections whilst maintaining high through-vehicle speeds has built in the potential for significant harm. Death and serious injury simply cannot be the accepted collateral damage to maintain existing levels of side-road accessibility, when the alternative to exclude right turns is likely to only impact a small number of vehicle trips by a matter of minutes of travel time.

The Transport Strategy therefore represents the optimum time for the South Australian government to demonstrate Vision Zero leadership by setting the future standards for speed management. This needs to be based on reducing the likelihood of high-energy collisions from occurring, as well as reducing the energy being exerted to the human body to a level that does not result in death or serious injury should any collision occur.(12)

### **Addressing reliance on private motor vehicles**

It is positive to see the Transport Strategy's Fact Sheet acknowledge the need for mode shift towards more sustainable transport options, however the benefits of this need to be seen beyond just alleviating congestion and reducing transport emissions.

Any reduction in the use of private motor vehicles on our roads results in a subsequent reduction in the exposure of road users to potential harm. As noted in our policy position statement on Climate Change and Road Safety, public transport is the safest form of transportation with Australian research confirming that a mode shift from private vehicles to public transport for commuting would not only reduce total crashes but also the severity of crashes.(13)

Improved safety through speed management can also address barriers that discourage people to travel via active transport. For example, the adoption of 30 km/h speed environments in areas of high pedestrian activity, such as on residential streets, could help encourage active travel participation, not only by reducing the potential for trauma should a collision occur between a vehicle and a person walking or cycling, but to also improve the perception of safety that stops many people from participating in active travel.(14, 15)



The College notes the recent Active Travel Design Guide published by DIT in September 2024(16), and are encouraged by the level of detail it provides for practitioners to ensure that our road system is tailored for active travel and green infrastructure. Noting that this is only a guideline, the Transport Strategy provides an ideal opportunity for the guiding principles of this document to be elevated to strategic policy initiatives to improve investment in active travel along with reducing the dependence on private motor vehicles.

The Transport Strategy should also set a strong platform for embedding road safety as the primary guiding action for both the upcoming “Active Transport and Personal Mobility Strategy” and “Passenger Transport Strategy”, which DIT have committed to undertake upon completion of the Transport Strategy.

## Urban planning

In the development of the Greater Adelaide Regional Plan (GARP), the College provided an initial submission to the draft GARP Discussion Paper in November 2023(17), and a subsequent submission to the draft GARP document in November 2024.(18) In these submissions we expressed significant concern that the State Planning Commission did not appear to comprehend its responsibility for road safety, given the lack of any reference to *South Australia’s Road Safety Strategy to 2031* and its associated Action Plan. We further recommended that the Commission seek urgent advice from the Road Safety team at the Department for Infrastructure and Transport (DIT) to gain a better understanding of the primary level of authority and accountability that exists within the South Australian government, and especially within the land use planning system.

As decisions made in land use planning directly impact road trauma through the design and provision of infrastructure and connection to services, to continue to ignore this responsibility will almost certainly see the continuation of hundreds of people being killed and seriously injured every year within the Greater Adelaide area, leaving no chance for South Australia to meet its adopted Vision Zero targets.

We recommend that these two GARP submissions be read in conjunction with this submission on the Transport Strategy, due to the intrinsic link between land use planning and the transport system. The unacceptable levels of road trauma currently occurring on our roads shows that current design approaches are severely lacking, and that fundamental changes are required. Whilst a major task to reduce these levels of trauma will require addressing established and legacy urban areas, it is unacceptable for any new urban development to implement road networks that follow the same design cues as the ones already causing our community so much harm.

The Movement and Place model is strongly recommended, and it should be applied to all transport networks beyond just those serving local areas. It is encouraging to see the level of detail on Movement and Place provided in DIT’s Active Travel Design Guide, however we also recommend that consideration be given towards adopting something similar to the NSW Movement and Place Framework which provides a whole-of-government integrated approach to support practitioners to implement a ‘place-based’ approach to the planning of transport networks.(19)

## Conclusion and Recommendations

South Australia's future population deserves to experience safe travel on the road network, without the risk of being killed or seriously injured. ACRS broadly supports the Transport Strategy's draft vision statement, five draft key focus areas and 13 draft strategic responses outlined in the supporting Fact Sheet.

However, the College strongly emphasises the need for the South Australian government to comprehend and act upon its primary level of authority and accountability in meeting the Vision Zero targets which the South Australian government has committed to. In that light, the key focus area of "Safety" should not be considered the equal of the other four or traded off for other benefits. It is the opinion of the College that the Safety focus area should underpin all others as an overarching goal of the Transport Strategy.

The Institute of Health Promotion and Education (IHPE) highlights this in their Position Statement on Road Safety, which states that: "Political will must match the scale and urgency of this public health crisis as well as the potential for improvement. Governments need a paradigm shift in commitment, investment, leadership and action." This statement further states that "Multimodal transport and land-use planning are important starting points for implementing a Safe System".(20)

Accordingly, we make the following broad recommendations to ensure that the Transport Strategy adequately considers the safety of people living, working and/or travelling throughout South Australia for the next 30 years:

1. Acknowledging South Australia's commitment to Vision Zero as a primary guiding action of the Transport Strategy.
2. Acknowledging the South Australian government's leading role in road safety outcomes, as holders of the highest levels of authority and power over the system as well as providing the required road safety stewardship to effectively lead other participants involved within the transport system.
3. Providing Vision Zero leadership by setting the future standards for speed management to reduce the likelihood of high-energy collisions from occurring, as well as reducing the energy being exerted to the human body should any collision occur.
4. Committing to a requirement that all new and improved roads have an AusRAP star rating of at least 3 stars.

We appreciate the opportunity to make this submission and to contribute towards improved road safety for all road users in South Australia through the Transport Strategy. Please do not hesitate to contact us should you need any further information.



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