

ACRS Submission on draft Greater Adelaide Regional Plan



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; 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.

Greater Adelaide Regional Plan (GARP)

According to the consultation website, "the State Planning Commission (the Commission) have released the Greater Adelaide Regional Plan (the Plan) and want to hear from community, councils and industry on how we sustainably prepare for future growth. The Plan set out a long-term vision for Greater Adelaide, detailing where people will live and work, how they will move around and where they will access services. It provides data and recommendations for managing growth and adapting to changes in our community and urban environment. Additionally, the Plan focuses on the maintenance of green spaces and tree canopies, modernising essential services and infrastructure, recognising neighbourhood character and prioritising environmental sustainability."

ACRS welcomes the opportunity to make this submission.

Previous ACRS response to the draft Greater Adelaide Regional Plan Discussion Paper (November 2023)

The College previously provided a response to the draft Greater Adelaide Regional Plan Discussion Paper on 6 November 2023. In this submission we noted that in the 10 years between 2013 and 2022, 950 lives were lost and more than 7,100 people were seriously injured on South Australian roads⁽¹⁾ and that over this time, 56% of lives lost and 72% of serious injuries occurred in the Greater Adelaide Regional Plan (GARP) area.

Since our submission, these numbers have increased following 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).

We have therefore updated the data presented in last year’s submission, which indicates that in the 10 years between 2014 and 2023, 970 lives were lost (and increase of 20) and more than 7,200 people were seriously injured on South Australian roads (an increase of 100). Over this time, 56% of lives lost and 71% of serious injuries occurred in the Greater Adelaide Regional Plan (GARP) area (Figure 1).

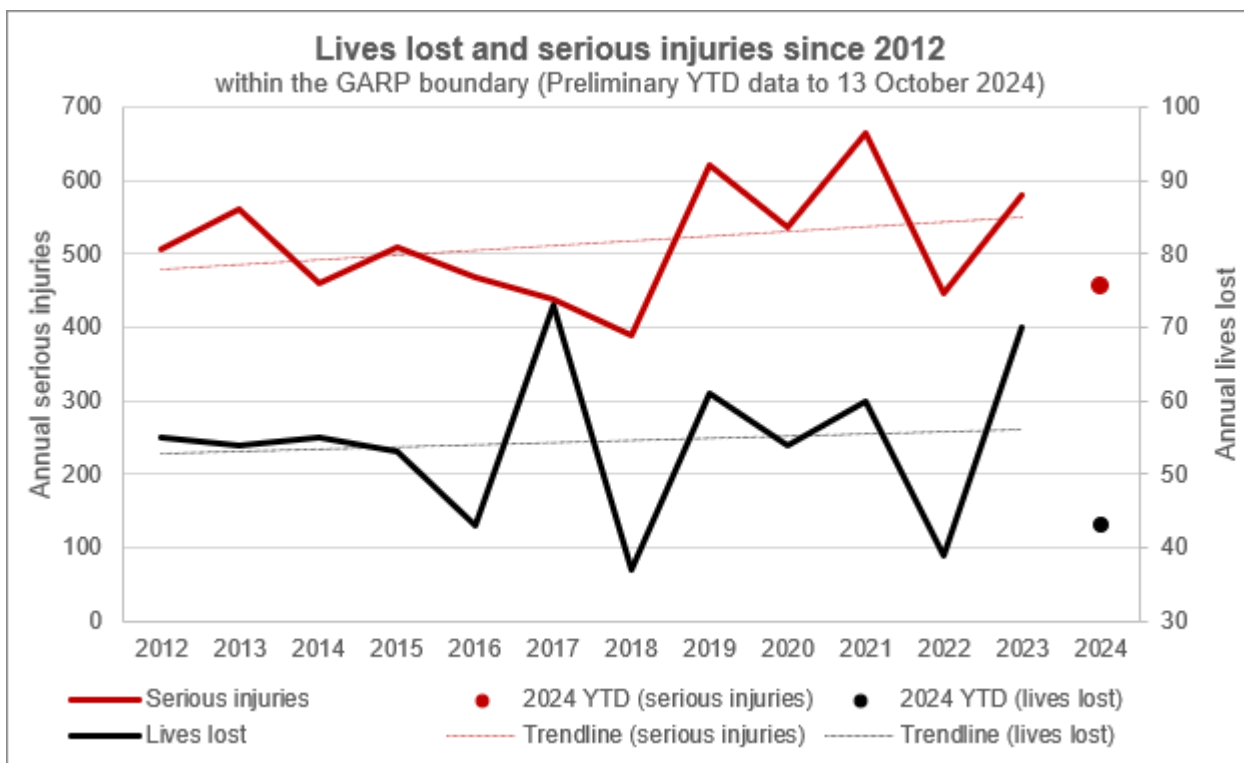


Figure 1
Source: Generated from data obtained from DIT

At best, this indicates the continuation of a plateauing trend in our road trauma rates, although more concerningly could suggest an increasing trend.

Without radical change to the way we plan and manage our road networks, we are currently on track to see almost 3,000 people killed on our state’s roads over the next 30 years. At the current rate of 56% of fatalities and 71% of serious injuries occurring on roads within the GARP area, this equates to around 1,600 people killed and 15,000 people seriously injured on these roads over the 30-year horizon of the GARP. Such levels of road trauma do not correlate with any notions of liveability.

Whilst we noted a good level of conceptual alignment between many areas of road safety and the draft GARP Discussion Paper, we are concerned that the Discussion Paper made no direct mention of the vital need to embed road safety into any planning vision, given that it is impossible to achieve universal liveability when people continue to be killed or seriously injured on our roads. Past experience has shown that improvements to road safety do not come quickly, or cheaply, and so a strategic approach is required(2).

We also drew the Commission’s attention to South Australia’s Road Safety Strategy to 2031(3), with its vision of “Zero lives lost on our roads by 2050”. This strategy, and its accompanying Action Plan, have the important targets of at least a 50% reduction in lives lost and at least a 30% reduction in serious injuries on South Australian roads by 2031.

The Strategy contains the “Principles for decision making and investment”, which states that “road safety will be a key criterion in all decision-making frameworks for investment decisions and policy setting”. 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”.

With the population projections for the Greater Adelaide Region indicating expected growth by up to 670,000 people over the next 30 years (an increase of up to 46%), the number of fatalities and serious injuries from road crashes would be expected to be even higher without significant actions being implemented to improve road safety.

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(4).

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(5). Even if we only achieve ‘almost zero’ people being killed or seriously injured on our roads by 2050, the benefits are vast.

Our previous submission recognised that the GARP discussion paper was a high-level strategic document outlining ways forward for the Greater Adelaide Region’s land use planning and associated infrastructure and environmental needs. We further emphasise that high-level strategies such as GARP represent an optimal time for governments to display the leadership required to have any chance of realising our Vision Zero targets, and the significant action that will be required to do so.

Accordingly, we made the following broad recommendations to improve the GARP and the safety of the residents within and visiting the Greater Adelaide Region:

1. South Australia’s Road Safety Strategy to 2031 and its associated Action Plan be referenced in the GARP as a key companion strategy, including with an explicit acknowledgement of the opportunities to improve road safety through GARP, showing that the government acknowledges and is actioning its primary level of authority and accountability.
2. Incorporate the Movement and Place approach as a key concept within GARP.
3. That GARP has a stated objective that urban designs should be aiming for 30 km/h speed environments in areas of high pedestrian activity such as on residential streets.
4. That GARP call for a requirement that all new and improved roads associated with greenfield land and infill developments have an AusRAP star rating of at least 3 stars.

ACRS response to the draft Greater Adelaide Regional Plan

The College continues to express significant concerns that the Commission does 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. The Commission should urgently seek 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. 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 GARP area, leaving no chance for South Australia to meet its adopted Vision Zero targets.

It is encouraging to see the Movement and Place approach included in the strategies for local transport networks. However, this approach must be applied to all transport networks beyond just those serving local areas. Transport for New South Wales (TfNSW) have recently developed 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(6). The GARP would be extremely well supported with a commitment to undertake a similar approach or otherwise refer to TfNSW's resource for application within South Australia, noting that it is standard practice within our state to refer to NSW's guidelines for traffic generating developments in the absence of any local equivalent (now known as the [NSW Guide to Transport Impact Assessment](#)).

The College also expresses concern that the Commission does not appreciate the critical need for the GARP to adopt 30km/h speed environments in areas of high pedestrian activity and the need for all new and improved roads to have an AusRAP safety rating of at least 3 stars.

ACRS feedback on sections within the draft Greater Adelaide Regional Plan

Our biggest priorities (page 9) – Effective speed management can also contribute towards addressing biodiversity loss, with lower speeds limiting the necessity for road formation widening and/or realignment that often requires the removal of sensitive roadside ecology.

People, housing and liveability (page 31) – We agree that safe access to secure and affordable housing is a fundamental human need and this should be reinforced with strong linkages to the goal of a zero-harm transport system by 2050 as specified in *South Australia's Road Safety Strategy to 2031*.

No new general infill development areas (page 36) – The GARP should expand on the statement about supporting the amenity of neighbourhoods that are experiencing high levels of infill to consider zero-harm streets for all people, including pedestrians and cyclists, and not just on-street traffic and car parking.

Greenfield and township development (page 37) – Glibly noting that people buying cheap housing on outer-fringe areas are likely to require a car journey to access employment or education opportunities is fraught and ignores the risks of entrenching transport disadvantage – more exposure to potential road trauma, higher transport costs, and longer commute times. Transport disadvantage could outweigh the initial lower up-front costs of cheaper housing. This section should also make a commitment for all new and approved roads associated with greenfield areas to have an AusRAP star rating of at least 3 stars.

Urban corridors (page 47) – Whilst the immediate adjoining areas can have good access to public transport and retail services, the high traffic volumes are almost always a significant barrier for active travel trips trying to move in a perpendicular direction across the urban corridor. The future zero end-state will require appropriate segregation of vehicles and vulnerable road users (VRUs), with low volume & low speed streets for people serving the areas immediately adjacent to high-movement road corridors. Traffic lanes should be ceded to high-frequency public transport services (including Bus Rapid Transport (BRT)) and regional (separated) cycleways where required to encourage safer and more sustainable travel modes rather than continue to build more road capacity for sustained car dependence.

Local infill investigation areas (page 50) – The long-term strategic objectives can be effectively supported with default 30km/h speed zones, which will subsequently reduce the spending required on infrastructure as lower speeds can accommodate more constrained road environments and aspects such as minimum sight distance requirements are reduced. This would also provide more space for urban greening.

Activity centres and main streets (page 53) – Implementation of 30km/h zones could significantly reduce the need for investment in traffic calming to provide the desired higher levels of amenity and support for local economies. This can then free up investment for improved public transport opportunities and services.

Local coordination and delivery (page 54) – Infrastructure schemes could be tailored to target public transport and active travel investment, rather than increased capacity for car travel.

Strategic infill coordination and incentives, transport integration and carparking section (page 58) – It is encouraging to see the GARP linking better public transport with lower need for car ownership and the subsequent reduced demand for car parking. We support any efforts to shift the paradigm of car dependence through schemes that support more public transport travel, such as de-coupling parking from housing and supporting alternatives such as car share services.

Greenfield and township development (page 59) – To comply with South Australia's adopted Vision Zero targets, the GARP must link any performance outcomes to a zero-harm transport system by 2050.

Productive Economy (page 104) – A net-zero emissions economy can't be solved simply by gradually replacing the current vehicle fleet with EVs. Significant mode shift is also required by supporting reduced car reliance, coupled with appropriate speed limit setting. Consideration must also be given to the social cost of road trauma, which is estimated to cost South Australia \$2.14 billion annually based on research commissioned by BITRE(4).

Outcome 5: An integrated and connected region (page 166) – In addition to more sustainable and coordinated growth, integrated land use and transport planning must also consider road safety and it is disappointing that the GARP completely ignores its critical role in achieving new development that does not kill or injure the people travelling on the associated road networks. Time and time again, road safety practitioners have been required to fix the mistakes of poor integration between land use planning and the transport system – often including new areas that were planned and approved in recent years. The land use planning stage, such as the GARP, represents the optimum time to set strong principles for a zero-harm transport network.

The fact that hundreds of people are being killed or seriously injured every year on the road network that currently serves the GARP area shows that the current design approaches are severely lacking, and that fundamental changes are required. Whilst a major task to reduce these levels of trauma will be to address the 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 trauma.

State road infrastructure (page 169) – Whilst the GARP mentions that the “interface between key movement corridors and residential areas must be carefully managed to avoid health impacts through exposure to emissions, noise and vibration”, this statement should also mention the need to avoid the health impacts of road trauma.

Public transport in growth areas (page 172) – It is encouraging to see the statement that high-quality public transport choices are vital in greenfield areas so that households are not compelled into multiple car ownership.

Local transport networks (pages 174-176) – These strategies need to link with the SA Road Safety Strategy and Action Plan as well as South Australia’s Vision Zero targets. Whilst it is good to see mention of Movement and Place, the GARP needs to place more emphasis on this and not forget its intrinsic link with the safety of the transport system users, not just productivity and economic benefit. With regard to creating elements of “Living Locally” to established middle-ring and outer metro neighbourhoods, these areas could be revolutionised overnight through the adoption of default 30km/h urban speed limits on local streets, at almost negligible cost.

Conclusion and Recommendations

Greater Adelaide’s future population deserves to experience safe travel on the road network, without the risk of being killed or seriously injured. ACRS supports the broad aims of the draft GARP and recognises its specific role to outline ways forward for the Greater Adelaide Region’s land use planning and associated infrastructure and environmental needs.

However, the College strongly emphasises the need for the State Planning Commission 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.

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.”(7)

There are simple references that can be included in the GARP document to provide the crucial guidance that practitioners need to realise the zero-harm transport networks that all people deserve to have when travelling throughout Greater Adelaide.

Accordingly, we strongly re-iterate our previous recommendations made in November 2023 to improve the GARP and the safety of people living, working and/or travelling within the Greater Adelaide Region:

1. South Australia's Road Safety Strategy to 2031 and its associated Action Plans be referenced in the GARP as a key companion strategy. This should include an explicit reference of the opportunities to improve road safety through the GARP, highlighting that the government acknowledges, and is actioning, its primary level of authority and accountability.
2. Incorporate the Movement and Place approach as a key concept within the GARP.
3. That the GARP has a stated objective that urban designs should be aiming for 30 km/h speed environments in areas of high pedestrian activity such as on residential streets.
4. That the GARP call for a requirement that all new and improved roads associated with greenfield land and infill developments have an AusRAP star rating of at least 3 stars.

Further to these points, GARP needs to recognise South Australia's commitment to Vision Zero and include the tracking of this target in any performance outcomes.

We appreciate the opportunity to make this submission and contribute to improved road safety for all road users in the Greater Adelaide Area through the GARP. Please do not hesitate to contact us should you need any further information.



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