ACRS Submission on South Australia's Public Transport Strategy

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.

To:
Transport Strategy Program Office
Department for Infrastructure and Transport
DIT.TransportStrategy@sa.gov.au

For further information please contact:
Teresa Williams: President, Australasian College of Road Safety
Dr Ingrid Johnston: Chief Executive Officer, Australasian College of Road Safety
Australasian College of Road Safety
PO Box 198 Mawson ACT 2607
e: ceo@acrs.org.au
p: (02) 6290 2509
w: www.acrs.org.au

27 June 2025

Table of Contents

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.

South Australia's Public Transport Strategy and Regional Review

South Australia's Department for Infrastructure and Transport (DIT) are developing a Public Transport Strategy to set the vision for public transport in South Australia for the next 30 years and provide direction on creating a public transport network to meet the needs of South Australia both now and in the future. This strategy follows on from the publication of South Australia's first Transport Strategy which was released in early 2025.

To provide further context, according to the DIT engagement website, the Public Transport Strategy will:

> *'…be used to inform planning for public transport initiatives. This ensures we make strategic, informed decision about what we prioritise and invest in. It will help us deliver a more resilient, reliable and accessible public transport network. As a result, it will boost economic growth and encourage more sustainable ways to travel'.*

DIT's website further notes that the strategy is required to enhance South Australia's public transport network to accommodate an additional 670,000 people that are expected to be living in the state by 2051, whilst also noting that 'we can't build our way out of road congestion'. The website also acknowledges the South Australian Government's commitment to reduce emissions by at least 60% by 2030 and achieve net-zero by 2050.

Separate to the Public Transport Strategy, DIT are concurrently undertaking a review of regional public transport services with a goal to 'provide access to integrated, accessible and effective public transport services that meet local needs.'

To help DIT shape a public transport future that works both now, and in the future, they are inviting feedback on what is important when it comes to public transport in South Australia.

The ACRS welcomes the opportunity to make this submission, noting that this follows on from our previous submission dated 16 December 2024 on South Australia's Transport Strategy. We recognise that this phase of public consultation is to support the development of a new Public Transport Strategy and undertake a Regional Review, and that the current supporting information is high-level in nature. Therefore, our feedback provides some guiding principles and considerations that are essential to ensure that the South Australian Government provides a safe and effective public transport system that will contribute towards its adopted Vision Zero target of zero deaths and serious injuries on South Australia's roads by 2050.

The ACRS also welcomes any opportunity to discuss our submission in further detail to assist in the preparation of the Public Transport Strategy and undertaking the Regional Review.

ACRS response to the consultation

a) Road Safety Benefits of Public Transport

The ACRS believes that safety is paramount in all modes of 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(1)

Public transport is the safest and most energy-efficient form of transportation.(2, 3) Australian research has confirmed that a mode shift from private vehicle to public transport (i.e., train, light rail or bus) for commuting would reduce not only total crashes by also the severity of crashes.(4) Better public transport access and coverage will also reduce the incidence of risky driving behaviours, such as inattention, drink and drug driving.(5)

Shifting the balance of transport infrastructure, policy and funding away from private fuel-based transport and towards public transport will prevent road trauma and increase the sustainability of the transport system. As public transport ridership increases, road safety outcomes will improve.

According to the Bureau of Infrastructure, Transport and Research Economics (BITRE)'s report on the Social Cost of Road Crashes, it is estimated that road crashes cost South Australia $2.139 billion every year (in 2020 dollars).(6) When compared to South Australia's 2025-26 Budget Statement, this figure equates to nearly one-quarter of South Australia's 2024-25 annual spend on Health and Wellbeing ($9.044 billion), slightly more than its annual spend on Infrastructure and Transport ($1.955 billion) and nearly double its spend on Police ($1.154 billion).(7) This indicates that significant investment in public transport could yield a substantial economic benefit through improved road safety, as this will reduce the pressure on our strained health and emergency response resources whilst improving the wellbeing of the broader community through better cardiovascular health and opportunities for social cohesion that a significant shift to active travel modes can help achieve.(8)

One of the often-overlooked benefits of a well-functioning public transport system to road safety, is in supporting measures that seek to prevent individuals who are deemed a safety risk from driving. Measures that result in licence suspension or disqualification, such as through the accrual of demerit points, participation in the mandatory alcohol interlock scheme, or failure of medical fitness to drive testing are only effective if the individuals concerned actually cease driving. If viable alternative options for travel and transportation are not available, then the unfortunate outcome is likely to be unlicensed driving which can result in significant consequences if detected or in the event of a crash.

Public transport growth also supports climate action, using less fuel and energy than private car transport. Notably, the success of public transport relies on non-motorised transport (including walking and cycling) that acts as a feeder to public transport stops/terminals. However, the lack of access to safe walking, cycling and public transport infrastructure is a critical barrier to modal shift strategies for sustainable, active transport.(9)

b) Public Transport Utilisation in Adelaide

According to Infrastructure Australia, travel by public transport in Adelaide is significantly lower than the levels achieved in Sydney, Melbourne and Brisbane.(10) Even in the aftermath of COVID-19, data from November 2024 indicates that public transport utilisation in Adelaide is still around 11% less than pre-COVID levels.(11)

As identified in the Greater Adelaide Regional Plan, the population in the study area is expected to grow by around 490,000 to 670,000 people in the period 2021-2051.(12) This growth is to be accommodated through densification and infill in existing urban areas, along with greenfield and township development.

Without viable and safe 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’.

c) At-Grade Level Crossings

There are 79 at-grade level crossings of the road and passenger rail network in Adelaide, with around 300 crossings for pedestrian and cyclists according to South Australia’s Level Crossing Safety Strategy 2025-2034.(13) The potential for interaction at level crossings exposes pedestrians, cyclists and vehicle occupants to extremely high levels of kinetic energy in the event of a collision with a moving train, with the forces exerted on the human body likely to result in death or serious injury.

The Public Transport Strategy should consider the inherent risks associated with all existing level crossings on the passenger rail network and seek to address these risks systematically. This should also include the geographical barriers that rail corridors can create, which reduces accessibility for walking and cycling opportunities. Proposed new passenger rail infrastructure should ensure that accessibility for pedestrians and cyclists is optimised across the corridor as best as possible, rather than creating new barriers that result in lengthy diversions which can discourage active travel modes.

d) End to End Trips

Whilst public transport services particular routes, the ACRS believes that the broader travel of the road user should be considered. The promotion of safe, emission free, end-to-end travel should also be considered as a related matter within the Public Transport Strategy. Specifically, when a road user alights from a public transport service, their subsequent travel should also be supported to be both safe, and preferably, emission free.

The ACRS acknowledges some policies and initiatives exist that promote sustainable end-to-end travel, such as allowing passengers to bring bicycles onto trains and buses without charge. Therefore, the Public Transport Strategy should consider how public transport journeys can be supplemented with trip chains involving bicycles and other micro-mobility devices, provided they can be carried on-board without jeopardising the health and safety of others. They can reduce demand for commuter car parking, reduce suburban traffic congestion, and reduce emissions.

It is also vital that the Movement and Place framework is applied as a foundational consideration in the provision of public transport services.(14) For example, many bus routes throughout the Adelaide metropolitan area involve high-volume, multi-lane arterial roads that facilitate high levels of movement. Where bus stops are provided, these are often isolated from safe and convenient opportunities for pedestrians to cross the road, resulting in a significant mismatch of the bus stop's Movement and Place function. An alternative to this could be a situation where public transport is able to access (at low speed) places where private vehicles are excluded, allowing pick-up and drop-off to occur in a safe location rather than concentrating groups of people immediately adjacent to a busy road and expecting them to navigate the environment on foot.

e) Further reading

The ACRS has prepared several Policy Position Statements that provide a concise overview of road safety policy issues, the principles underpinning the ACRS position, and an evidence base for recommended policy actions.

The following ACRS Policy Position Statements make direct reference to aspects of public transport, and we recommend that this information is considered in the development of the Public Transport Strategy;

- Climate Change and Road Safety Policy Position Statement: This calls for governments to invest in and prioritise public transport, which will result in reduced transport-related emissions whilst reducing road crashes.(15)
- A New Systems-Thinking Approach to Road Safety Policy Position Statement: Acknowledging that different participants in the transport system have different levels of authority, this statement recommends the application of systems thinking in the development of measures to address existing issues – for example increasing availability of public transport in rural areas to manage driver fatigue.(16)
- The Vehicle as a Workplace Policy Position Statement: As custodians of a significant portion of South Australia's public transport services, the South Australian government is responsible for the health and wellbeing of a large number of employees operating or travelling on vehicles that are also their workplace.(17)

- Rural and Remote Road Safety Policy Position Statement: This notes the need for safe and comprehensive public transport opportunities as an alternative to private vehicle travel to improve safety for those travelling in rural and remote areas.(18)

Conclusion and Recommendations

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

- Road safety is of paramount consideration in any review of current and future public transport needs in South Australia;
- There are benefits for road safety from safe and efficient public transport particularly when considering end-to-end trips, the broader road travel of the road user, and supporting the travel of individuals who are deemed to be unsafe as drivers;
- It is critical that new residential growth areas have excellent public transport opportunities up-front, to ensure that new residents in these areas are not forced to solely rely on car-based travel.

Please do no hesitate to contact us should you require any further information.

Dr Jamie Mackenzie
Chair SA Chapter
Australasian College of Road Safety

Dr Ingrid Johnston
CEO
Australasian College of Road Safety

References

1. United Nations General Assembly. Improving global road safety. Seventy-fourth session, Agenda item 12. Resolution adopted by the General Assembly on 31 August 2020 A/RES/74/299. https://undocs.org/en/A/RES/74/299: UN; 2020.
2. World Health Organization. Health in the green economy: Health co-benefits of climate change mitigation - transport sector. https://www.who.int/publications/i/item/9789241502917: WHO; 2012.
3. World Health Organization. Global status report on road safety 2015. https://apps.who.int/iris/handle/10665/189242: WHO; 2015.
4. Truong LT, Currie G. Macroscopic road safety impacts of public transport: A case study of Melbourne, Australia. Accident Analysis & Prevention. 2019;132:105270.
5. Hasan R, Watson B, Haworth N, Oviedo-Trespalacios O. A systematic review of factors associated with illegal drug driving. Accident Analysis & Prevention. 2022;168:106574.
6. Steinhauser R, Lancsar E, Bourke S, Munira L, Breunig R, Gruen R, et al. Social cost of road crashes. Report for the Bureau of Infrastructure and Transport Research Economics. https://www.bitre.gov.au/sites/default/files/documents/social-cost-of-road-crashes.pdf: ANU; 2022.
7. Government of South Australia. State Budget 2025-26 Budget Statement, Budget Paper 3. https://www.treasury.sa.gov.au/__data/assets/pdf_file/0003/1159383/2025-26-Budget-Statement.pdf: Government of South Australia; 2025.
8. Ding D, Luo M, Infante MFP, Gunn L, Salvo D, Zapata-Diomedi B, et al. The co-benefits of active travel interventions beyond physical activity: a systematic review. Lancet Planet Health. 2024;8(10):e790-e803.
9. Sims R, Schaeffer R, Creutzig F, Cruz-Núñez X, D'Agosto M, Dimitriu D, et al. Transport. In: Edenhofer O, Pichs-Madruga R, Sokona Y, Farahani E, Kadner S, Seyboth K, et al., editors. Climate change 2014: Mitiagation of climate change Contribution of Working Group III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge: Cambridge University Press; 2014.
10. Infrastructure Australia. Adelaide public transport capacity and access: Australian Government; [cited 2025 26 June]. Available from: https://www.infrastructureaustralia.gov.au/ipl/adelaide-public-transport-capacity-and-access.
11. Kelsall T. Public transport's lingering COVID hangover. InDaily. 2024 1 November.
12. Government of South Australia. Greater Adelaide Regional Plan: Government of South Australia; [cited 2025 26 June]. Available from: https://regional.plan.sa.gov.au/regional-plans/greater-adelaide/.
13. Department for Infrastructure and Transport. South Australia's Level Crossing Safety Strategy 2025-2034. https://dit.sa.gov.au/__data/assets/pdf_file/0011/1392518/SA-Level-Crossing-Safety-Strategy-2025-2034.pdf: Government of South Australia; 2025.
14. NSW Government. Movement and place - design of roads and streets [cited 2024 31 October]. Available from: https://www.movementandplace.nsw.gov.au.
15. Australasian College of Road Safety. ACRS Policy Position Statement: Climate Change and Road Safety. https://acrs.org.au/wp-content/uploads/ACRS-Climate-Change-PPS-2023.pdf: ACRS; 2023.
16. Australasian College of Road Safety. ACRS Policy Position Statement: A new systems thinking approach to road safety. https://acrs.org.au/wp-content/uploads/A-new-systems-thinking-approach-to-road-safety-FINAL.pdf: ACRS; 2023.
17. Australasian College of Road Safety. ACRS Policy Position Statement: The Vehicle as a Workplace. https://acrs.org.au/wp-content/uploads/ACRS-Policy-Position-Statement_Vehicle-Workplace.pdf: ACRS; 2024.
18. Australasian College of Road Safety. ACRS Policy Position Statement: Rural and Remote Road Safety. https://acrs.org.au/wp-content/uploads/ACRS-Policy-Position-Statement-Rural-Remote-Road-Safety.pdf: ACRS; 2025.