

South Australia's Road Safety Strategy to 2031

LGA submission

September 2021

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Summary of Response

The Local Government Association of South Australia (LGASA) welcomes the opportunity to provide feedback on South Australia's Road Safety Strategy to 2031 ('the Strategy').

The key comments are:

- general support for the directions of the Strategy and eager anticipation for the forthcoming Action Plan which will detail roles and responsibilities, timelines and funding;
- recognition of the particular challenges of managing the road network in regional and remote areas;
- the need for funding, training and professional support for local government to be empowered to develop a key aspect of the Strategy, being network safety plans;
- recognition that speed underpins all aspects of the Strategy, and that guidance is required to implement change effectively;
- support for the need to improve the safety of the South Australian motor vehicle fleet through the purchase of newer, safer (and more environmentally friendly) vehicles;
- the need for significant investment in road infrastructure;
- support for the Movement and Place Framework and the need for this to be developed;
- the opportunities for improved relationships between State and local government;
- the opportunities to better integrate alternative modes of transport into the network;
- the need for comprehensive and well-funded public education programs on a range of issues;
- the need for effective measurement of Strategy outcomes, and the collection and access to road network data to manage implementation; and
- the need for clarity in messaging around heavy vehicles.

Introduction

About the Local Government Association of South Australia

The Local Government Association of South Australia (LGASA) is the voice of local government in South Australia, representing all 68 councils across the state and the Anangu Pitjantjatjara Yankunytjatjara.

The South Australian *Local Government Act 1999* recognises the LGASA as a public authority for the purpose of promoting and advancing the interests of local government. The LGASA is also recognised in and has prescribed functions in 29 other South Australian Acts of Parliament. The LGASA provides leadership, support, representation and advocacy relevant to the needs of our member councils.

The LGASA is a strong advocate for policies that achieve better outcomes for councils and the communities they represent. As such, the LGASA welcomes the opportunity to provide a submission to the Strategy and is pleased to have been included as a key stakeholder throughout development of the Strategy.

Background

Local government has an important role to play in road safety because, as road managers, councils build, maintain and regulate roads and have a responsibility to provide a safe operating environment for road users. Given that roads controlled by councils account for more than 50% of serious injuries, councils have a role to take action to reduce road trauma.

In addition, councils are significant employers and local government employs around 11,000 staff in South Australia. Local government has an important role to protect its staff, as well as lead by example in supporting its communities.

This Submission

This submission is informed by the LGASA's Guide to a Local Government Road Safety Strategy and Action Plan ('the Guide'). The Guide was endorsed by the LGASA Board of Directors on 29 August 2019 and has been provided to the State Government, including relevant ministers. The Guide was developed in consultation with the LGASA's member councils and continues to form the basis for LGASA advocacy on road safety.

The LGASA has been working with the Department of Infrastructure and Transport (DIT) throughout its consultation with local government and is keen to ensure that the interests of local government are recognised in the Strategy.

The LGASA also provided a submission to the consultation process dated December 2020 and this submission is based on the twelve key principles embodied in that document. This submission is informed by consultation with a range of council staff from the LGASA's member councils.

Principles for the Road Safety Strategy

The LGASA's December 2021 submission focussed on twelve key principles around road safety which are supported by the LGASA:

Principle 1: A safe road system supported by all levels of government

Principle 2: Sufficient investment in the State's roads for a safe road system for the 21st century

Principle 3: Road and roadside safety is integrated into all aspects of planning of the State's road system

Principle 4: Complementary principles

Principle 5: A safe road system which includes a quality public transport network and pedestrian and cyclist routes

Principle 6: Educate the public about the impact of speed

Principle 7: Educate the public about the benefits of safe vehicles

Principle 8: Motorcycles should reflect the latest technology in vehicle safety

Principle 9: Heavy vehicles should reflect the latest technology in vehicle safety

Principle 10: Focus on driver and passenger behaviour

Principle 11: Improve knowledge about the road safety system to better prioritise actions

Principle 12: Encourage leadership in road safety by state and local government

Feedback on the Strategy

Feedback on the Strategy is provided based on the following key areas:

Broad approach of the Strategy

The LGASA:

- congratulates the State Government and DIT on a thorough and consultative process in the development of the Strategy;
- supports the structure of the document, its background in research and evidence and its clear layout and design;
- broadly supports the principles, key strategies and proposed actions outlined in the draft Strategy;
- notes the high number of strategies (78) which will require considerable resources and commitment to implement; and
- looks forward to release of the Action Plan which will provide greater illumination of the roles and responsibilities of all tiers of government and other key stakeholders.

It is acknowledged that this is broadly a Strategy for the State Government, with whom local government is a partner.

Regional and remote areas

The Strategy's emphasis on the particular challenges of regional and remote areas is strongly supported (Strategies 52, 53, 54, 55, 56, 57 58 and 59) and consistent with previous submissions by the LGASA.

It is acknowledged that while metropolitan Adelaide performs relatively well in road trauma compared to regional and remote areas, these challenges are coupled with the generally far fewer resources of these smaller regional councils.

An equitable approach which focuses on the particular issues in regional and remote areas is required. The Government is also encouraged to consider the challenges of the peri-urban road network that surrounds Metropolitan Adelaide which includes a major network of rural roads that often carry high traffic volumes due to the larger surrounding population base and tourism destination.

Network safety plans

The evidence-based approach to the development of network safety plans (Strategies 49, 52, 53 and 70) is supported and the approach of local councils working together with the State Government to develop these plans and review local precincts is appreciated.

However, local government needs funding, training and professional support to develop network safety plans. It is anticipated that the proposed Action Plan may shed further light on how this will be implemented and how it will be funded.

Furthermore, clarification is needed on how the 'evidence-based' approach will work. For example, instances where traditional evidence (such as volume/speed/crash) is not effective are:

- locations with a high number of 'near-misses' does not provide evidence of an unsafe location;
- current practice which requires that where there is a strong desire line for pedestrians to cross an arterial road, data is required to show that a high number of pedestrians are crossing - however, because the road is too hazardous to cross, pedestrians either drive or walk a different way and the evidence cannot be obtained; and
- while vehicle data is collected, cyclist and pedestrian data is not easily accessed.

Councils report that emergency access should also be considered in the development of network safety plans, such as:

- evacuating residents and road closures due to bushfire threat or after a fire front has passed and providing alternative routes; and
- managing unplanned closures due to other emergencies, such as a fatal crash or burst water main.

Network safety plans should also be designed to plan for the road system reaching or having reached capacity, coupled with plans for alternative transport options such as pedestrian, cyclist routes and public transport.

Speed

The integration of speed throughout the Strategy (Strategies 12 and 39) and the emphasis on the evidence of improved outcomes as a result of lower speed limits is strongly supported.

However, guidance for the implementation of lower speed environments would support local government decision-making in identifying lower speed roads and intersections and determining what 'lower speed' is.

Councils report that they would support:

- increased enforcement of speed limits by SAPOL;
- review of speed limits across the network, including DIT-managed roads;
- lower speed limits in high pedestrian-use precincts in tandem with the Movement and Place Framework;
- improved management of school speed limits, which can be sometimes applied inconsistently and applied over a short distance which can be confusing to motorists; and
- review of the use of the 50km/h default speed limit on lower volume roads, which is not always clear to motorists and can make enforcement difficult.

Vehicles

The Strategy's emphasis on the importance of reducing the age of South Australia's vehicle fleet is strongly supported (Strategies 29, 30, 31 and 59) and consistent with previous submissions by the LGASA.

The 'fleets first' approach to reducing the age of the vehicle fleet in South Australia is supported and should be implemented in tandem with the Department for Energy and Mining's support for electric vehicles as an effective way to get safer, newer and more environmentally friendly vehicles on the road network.

The LGASA has been active in this area, providing input into the State Government's proposed road user charge consultation and the Federal Government's Future Fuels Discussion Paper.

Roads

The Strategy's emphasis on the need for improved road infrastructure (Strategies 8, 36, 46, 47 and 48) is strongly supported and consistent with previous submissions by the LGASA.

However, significant investment is required to implement these improvements.

The Strategy identifies several examples of safe system treatments which will be of benefit to local government. The reference to cycling and walking infrastructure here is also supported.

These examples could be expanded (such as channelised turn lanes even on low traffic volume regional roads and examples for an 80km/h outer metro road and unsealed rural/remote road) and elaborated upon. For example, integration of infrastructure for cycling and pedestrians with roundabouts is a challenge, as roundabouts generally prioritise cars. The Government is encouraged to consider modified roundabout designs with bicycle lanes and pedestrian crossings incorporated into the design, such as Dorcas and Moray Streets in South Melbourne (see below).



This incorporation of cycling and walking infrastructure is important to local government to ensure a systematic and connected network of cycling and pedestrian routes for its communities.

Movement and Place Framework

The Strategy's emphasis on the Movement and Place Framework is strongly supported (Strategies 38, 39, 40 and 42) and is consistent with previous submissions by the LGASA.

The Movement and Place Framework is supported as an effective way to embed lower speed limits into a pedestrian- and cycle-friendly environment particularly in high use areas such as shopping precincts and schools. It also supports implementation of opportunities to make the road environment, footpaths and crossings safer for older people (Strategy 36) and people living with disability.

However, while the Movement and Place concept is supported, it is understood that a defined framework for application in South Australia is yet to be developed. DIT is encouraged to develop guidelines for the Department, as well as for councils, in consultation with local government. The Framework needs to address more than just speed limits, but also integrated design solutions that create a more attractive place as well as a safer place.

Implementation of the Movement and Place Framework would also have more credibility if works which are undertaken by DIT adopted the same approach. Councils have reported feeling disheartened when DIT persists in a car-centred approach in all locations, to the detriment of other modes of transport.

An effective Movement and Place Framework would provide guidance for all scenarios, demonstrate good examples and recognise the local environments in which people live and work. For example, lower speed environments need to be designed as such and then followed through with effective policing.

Relationships between DIT and local government

The Strategy's emphasis throughout the document on supporting capacity building of local government and working with local government (Strategies 42, 69, 70, 71 and 72) is strongly supported and consistent with previous submissions by the LGASA.

The leadership role of DIT, highlighted in the Strategy, is also supported (Strategies 24 and 64).

A stronger relationship between DIT and individual councils would be broadly welcomed by local government. In setting the Strategy and forthcoming Action Plan, DIT may wish to consider how a single point of contact within DIT for queries and advice would go a long way to strengthening a working relationship at a practical level.

In addition to the measures identified (Strategy 70), councils are keen for an approach which facilitates regular and open collaboration between DIT and councils in relation to road safety and traffic operations, which would be advantageous to both levels of government. An example of where this works effectively is with DIT staff on the Way2Go school safety program. Weekly contact with DIT staff and monthly site visits, has been described as a valuable resource to assist local government efforts in improving road safety around schools.

Working closely with DIT in the design of road improvements will ensure the needs of local government, DIT and the community are met, and likely achieve outcomes around movement and place, safer and connected pedestrian and cycle routes, and pleasant environments.

Two other issues have been raised by our member councils where DIT could support local government in its capacity-building are:

- The need for standardised documentation for developments which generate traffic, such as road design reports, traffic impact statements and traffic assessments. Council staff are not always able to effectively negotiate with developers to ensure that existing requirements are met and need greater support to work together with developers and their traffic consultants who may underestimate traffic volumes. This issue will be even more likely in regional councils who may not have traffic engineers on staff.
- The need for appropriate accreditation in South Australia to be able to design traffic-generating developments, such as carparks, which can currently be designed by an architect or landscape designer and do not always meet traffic engineering requirements.

Walking, cycling and public transport

The Strategy's emphasis on integration of the road network with walking, cycling and public transport as a means of supporting safety outcomes is strongly supported (Strategies 50, 41, 56 and 58) and consistent with previous submissions by the LGASA.

However, despite recognising that public transport is the safest form of transport, the Strategy could do more than just 'promote its benefits' (Strategy 50). DIT is encouraged to use its influence to support greater public transport investment by the State Government and integration as part of a transport network. There are many reasons why public transport is not better patronised in South Australia and merely promoting its benefits will not effect lasting change.

It is noted that the role of emerging forms of transport such as e-scooters could also be recognised.

Road safety education programs

The Strategy's emphasis on public education throughout the document and in relation to all aspects of the Strategy including driver behaviour, vehicle purchasing, heavy vehicles and use of safety devices is strongly supported (Strategies 1, 3, 5, 9, 11, 13, 16, 21, 23, 25, 26, 34, 44, 57, 60, 62, 65 and 73) and consistent with previous submissions by the LGASA.

However, implementation of these programs will require investment and specialist expertise. Several councils have expressed their support of programs currently being delivered such as Way2Go, TravelSMART Households and Smarter Travel @ Work and the learnings from these programs could inform the development of a comprehensive education campaign.

Improving and integrating information, data and research

The Strategy's emphasis on research, data and emerging new technologies is strongly supported (Strategies 7, 10, 17, 22, 37, 45, 51, 55, 61, 75, 76, 77 and 78) and consistent with previous submissions by the LGASA.

Measuring success in a Strategy such as this is crucial as the outcomes are literally life and death. It is concerning that South Australia is currently likely to exceed the road safety targets in the existing Strategy once again in 2021.

As documented in the Inquiry into the National Road Safety Strategy 2011-2020, the notion of 'implementation failure' is raised in response to a lack of reduction in deaths and serious injury crashes relating to that Strategy. The Strategy should provide clear and easily measurable Key Performance Indicators (KPIs) that can be used across all three tiers of government as well as by other stakeholders associated with road safety such as SAPOL, educators, researchers and medical practitioners.

A clear and effective Action Plan with measurable KPIs will support implementation.

There is also an appetite in many councils to have support to trial more innovative traffic management techniques on local streets and in rural and regional areas based on research (Strategies 55 and 75).

Local government is also keen for collection and access to all types of data which will assist its work, not just where deaths occur. Local government requires collection and access to as many sources of useful data as possible to support development of network safety plans. For example, a mechanism to support near misses and more efficient recording of 'property damage only' incidents is encouraged to support decision-making and development of network safety plans. While local government understands the burden of collection of data on SAPOL and the State Government, it maintains that all data is useful.

Heavy vehicles

The Strategy's inclusion on the particular role of heavy vehicles in road safety is supported (Strategies 5, 6, 67 and 68) and is consistent with previous submissions by the LGASA.

In regard to Strategy 5, to 'Better inform and educate the community about safe interaction with heavy vehicles', it should be noted that education campaigns should be encouraged while also balancing the message with the safety of high productivity freight vehicles. In recent years, there has been emphasis on higher productivity freight vehicles (HPFV) due to their safety and reduction of heavy vehicle movements on the road network.

However, this needs to be balanced with the heavy vehicle safety messaging about providing space on the road. The messaging needs to be balanced in relation to the intent of 'safe interactions' without contradicting the message of the safety of HPFVs.

While increased numbers of rest areas may be supported (Strategy 68), it could be implied from the reference at page 55 that this would be a council responsibility so this needs to be clarified about how this would be implemented.

Conclusion

This submission reflects the approach of the LGASA's Guide to a Local Government Road Safety Strategy and Action Plan endorsed by the LGA Board of Directors in August 2019 and is based on consultation with LGASA member councils.

The LGASA congratulates the State Government on a comprehensive Strategy and eagerly anticipates the forthcoming Action Plan which will clarify roles and responsibilities, timelines and funding. The LGA welcomes the opportunity to have input into the Action Plan.

Contact:

Katherine Russell
Manager Policy Projects
LGASA
Email: Katherine.russell@lga.sa.gov.au
Tel: 8224 2067



Local Government Association
of South Australia

The voice of local government.

148 Frome St
Adelaide SA 5000

GPO Box 2693
Adelaide SA 5001

T (08) 8224 2000

F (08) 8232 6336

E lgasa@lga.sa.gov.au

www.lga.sa.gov.au