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AUSTRALASIAN COLLEGE OF
ROAD SAFETY

Supporting our members to eliminate serious road trauma through knowledge sharing, professional development, networking and advocacy
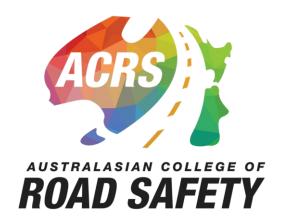
ACRS Submission on
A National Urban Policy for Australia

To:
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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.

The consultation draft notes that the National Urban Policy, the first for Australia since 2011, outlines goals and objectives to enable urban areas to be liveable, equitable, productive, sustainable and resilient. The Policy is developed supporting the achievement of United Nations Sustainable Development Goal (SDG)11: Sustainable cities and communities – Make cities and human settlements inclusive, safe, resilient and sustainable.(1) It seeks to better integrate an urban lens across policy-making to ensure future Australian Government policies, programs and investment are supporting sustainable growth in urban places. This is stated to be achieved through implementation focussed on addressing urgent challenges facing cities, such as jousting, productivity, social cohesion, disaster resilience and climate action. The Policy has been committed to by all Australian Governments, and will be implemented by the Australian Government working with states and territories.

ACRS response to the Consultation Draft

a) State of the cities snapshot

The draft Policy notes that safe transport is essential to meet several of the goals. However, it fails to recognise that Australia's road safety record falls well behind other leading countries(2) and that renewed approaches and emphasis is required to make our urban roads safe. It should also be recognised that Australia did not meet our 2010 or 2020 road safety targets, and is not on track to meet the 2030 target described in the current National Road Safety Strategy 2021-2030 (NRSS).(3, 4)

Whilst a good range of issues are presented, issues regarding road safety and active transport are not adequately incorporated. The snapshot does touch on the points that:
- Cities with the lowest levels of public transport access also have the lowest levels of walkability, and notes this influences car dependency; and
- The social infrastructure health index is two to three times higher in the inner city locations than the peri-urban areas of the five largest cities.

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However, the snapshot does not recognise and articulate the nexus of these issues with road safety and the compounded disadvantage for impacted social and economic groups. Such a nexus also exists with matters such as passenger cars accounting for carbon emissions, and the likelihood that people in disadvantaged or lower socioeconomic groups are more likely to own older, higher polluting and less safe vehicles, and have less access to other safer transport.(5-7) The College recommends that the State of the Cities snapshot includes or reflects the inter-relationship between road safety and the most related issues presented. Noting the annual cost of road trauma to the economy of $30 billion stated in the NRSS and its adoption of a Social Model approach, it would be consistent for the Policy to better reflect and support the NRSS.

b) Purpose

The draft Policy supports the achievement of SDG 11: Sustainable cities and communities, and identifies this aims to "make cities and human settlements inclusive, safe, resilient and sustainable". The College notes that the draft Policy does identify some of the inter-related SDGs, however, it does not adequately reflect some aspects of SDG 11 such as:

Target 11.2:

By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.(1)

This shortcoming is inherent throughout the draft Policy.

c) Australia's National Urban Policy (background)

It is noted by the College that the Infrastructure Policy Statement released by the Australian Government in November 2023 provides three themes: Productivity and Resilience, Liveability, and Sustainability.(8) These are highly aligned with the previous National Urban Policy from 2011. Given the high level of inter-relationship between the Policy and Australian Government infrastructure investment, particularly transport infrastructure, the new Policy and Statement should be aligned.

d) Urban Policy Forum

The College supports the Australian Government's efforts to consult and to seek advice regarding the development of the Policy. Given the extent to which the Policy inter-relates with a range of policy and professional domains, the Urban Policy Forum would benefit from a broader range of professionals rather than focussing so heavily on urban policy experts, academics, peak bodies and urban planning professionals. Road safety is a significant and often down-played profession that requires representation by road safety experts. The College is Australia's peak road safety body and is an international organisation with members in nearly forty countries. It is well placed to provide input to such a forum and would welcome such an opportunity.

e) Shared Vision and Roles

The draft Policy states that "*consistent with the shared vision, the Australian Government supports stronger alignment and partnerships between, across and with governments*", it further states "*the three levels of government, as well as communities and businesses, all have a vital role to play in urban planning and development*". The College fully supports the recognition that not only government, but many other stakeholders have a role to play in urban development.

What should be explored further is the role and responsibilities of governments at all levels to determine standards for urban development; to drive safe, liveable and sustainable design. Too often the requirements for land developers do not enable safe, liveable and sustainable design and perversely some engineering standards or fixation with large forms of rubbish trucks or public transport buses results in housing precincts not being safe, healthy and sustainable designs. Infrastructure Australia (IA) touch upon this weakness in its publication "Keeping our cities liveable as they grow", in which it is stated that Australian Governments have not always '*got it right*' when it comes to planning liveable cities.(9) In this publication IA identify characteristics such as "*safety, attractiveness, social cohesion and inclusivity, environmental sustainability and affordable and diverse housing linked by high quality public and active transport*" as the determinants of a liveable neighbourhood.

The fact that thousands of people are being killed or seriously injured every year on urban roads throughout Australia(4, 10) 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 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 trauma.

The College recommends the Policy further explore and become a means to delivering change for all levels of government regarding urban planning and development standards, regulations and requirements for land developers, to reduce road trauma and increase safe active travel. The Austroads project "Charting a path to eliminating road death and serious injury" is currently underway to define measures and frameworks for achieving a zero harm end state,(11) and the Policy should be heavily guided by the findings of this work.

The Australian Government can be involved as a leader through research, incentives and investment decisions that influence State and Territory governments, and flows to change for local governments. To this end, the Policy needs to be diligently implemented, using federal funding as a lever to incentivise projects which are consistent with the Policy.

f) Australian Government goals

The draft Policy states five key goals, being liveable, equitable, productive, sustainable and resilient. The key goals do not include 'safe'. It is noted safety is incorporated as a factor for 'liveable'. However, safe transport is a significant issue for many of the key goals, not just liveable, and safety is a broad issue that incorporates amongst other things, crime, work and community facilities like parks and buildings. Taking such a broad approach does not sufficiently convey the multitude of issues that can be unpacked from this single word in the Policy.

The College recommends adding a specific goal for safety, which would incorporate road safety as well as other forms of safety relevant to the urban environment. This would better align the goals with SDG 11 and provide clarity on the priority given to safety.

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g) Australian Government objectives

The draft Policy provides six objectives of the Australian Government to support achievement of the five goals. A further list of initiatives is provided as an Appendix. Whilst the reader can make their own assumptions about the 'how' and 'extent' of each objective's relationship to one or more goals, the Policy would be improved by mapping the relationships for the reader. This could be in the form of a matrix or 'network' style illustration. Such mapping would increase clarity and the guidance value of the Policy. This approach could also better enable the incorporation of points regarding transport safety, including road safety, walking and cycling safety, public transport and vulnerable community members such as women, children and road users who have mobility issues or are disadvantaged due to socioeconomic or other issues. Done well, mapping the objectives and goals could result in the two sections being amalgamated and more concise.

The College recommends the review, mapping and amalgamation of the goals and objectives sections.

h) Principles

The principles are noted as being intended to guide planning, design, investment, development, governance, and management of cities and other settlements. They are to inform the achievement of the Policy's goals and objectives. Many statements miss an opportunity to include how, or the desire to, improve safety for road users such as those who would choose to walk, cycle or use some other non-vehicle form of transport.

The priorities for each principle are identified, yet little is provided to ascertain how the priorities will be implemented. Further, it is noted that many other policies, strategies and similar existing commitments are referenced. Ultimately, this leaves the achievement and success of the Policy contingent upon the quality and success of the referenced documents. For example, the NRSS is based upon a social model approach being implemented,(12) however, after three years of the strategy the current and recent years data for road trauma in Australia does not appear to show any positive impact.

As the success of the Policy is heavily reliant upon other policies, strategies and plans, this raises the question of the extent to which the Policy will provide a focus upon the efforts that influence the outcomes. Will the influence of the Policy be of value? The concept of demonstrating and articulating the inter-related nature of urban areas is commended and supported. It is an opportunity to influence and steer positive change, which the College encourages the Australian Government to pursue.

Conclusion

The 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 all levels of government and the private sector to design, develop and maintain urban areas that are safe for all road users, encourage safe active travel, and contribute to emissions reductions through fewer people wanting or needing to drive.

The College considered that every decision made regarding how we design or build urban areas is an occasion with the potential to establish and maintain places that are people centred, with health, safety and wellbeing being inherent in the built environment. A systems thinking approach is required, which builds on the Safe System approach adopted by many countries to reduce road trauma.(13) The College policy position

statement can assist understanding and how to incorporate this approach for Australian Government policy.(14) Such an approach recognises that just like urban areas:

- The road traffic system is a complex interaction of many interrelated components, involving many participants in different situations;
- Many user errors and crashes are created by the interactions between road system components;
- Different participants within the road system hold different levels of authority, responsibility and power, and this hierarchy of control should be considered to make those participants with more influence in the decision making process more accountable;
- The design and operation of a safe system must respond to the capacities as well as the limitations and vulnerabilities of humans; and
- Understanding the interactions of users with the system and society is required in order to improve and reduce, for road safety, death and serious injury.

Such an approach should be considered within the contact of a hierarchy of authority; such as the ability of planning, health, social services, transport agencies and road authorities to contribute to improving road safety. Notably, safe residential streets can easily be achieved through universal adoption of 30km/h default speed limits, such as undertaken in Wales or Yarra in Melbourne.(15, 16)

Recommendations

The College welcomes the draft National Urban Policy and the inclusion of road safety as a key consideration in several areas of focus. We recommend road safety be further incorporated and highlighted through:

- The State of the Cities snapshot includes or reflects the inter-relationship between road safety and the most related issues presented;
- SDG target 11.2 be reflected;
- The Urban Policy Forum include a broader range of professionals including from road safety;
- Adding a specific goal for safety, which would incorporate road safety as well as other forms of safety relevant to the urban environment; and
- The review, mapping and amalgamation of the goals and objectives sections.

The College appreciates the opportunity to comment on this draft Policy and contribute to improved urban planning in Australia. Please do not hesitate to contact me if you need any further information.

Dr Ingrid Johnston
CEO, Australasian College of Road Safety

References

1. United Nations Department of Economic and Social Affairs. Sustainable Development https://sdgs.un.org/goals: UN; [cited 2022 20 July]. Available from: https://sdgs.un.org/goals.

2. Bureau of Infrastructure Transport and Regional Economics (BITRE). International road safety comparisons 2022 statistical report. https://www.bitre.gov.au/sites/default/files/documents/international_comparisons_2022.pdf: Department of Infrastructure, Transport, Regional Development, Communications and the Arts; 2023.

3. Woolley J, Crozier J, McIntosh L, McInerney R. Inquiry into the National Road Safety Strategy 2011-2020. https://www.roadsafety.gov.au/sites/default/files/2019-11/nrss_inquiry_final_report_september_2018_v2.pdf: Office of Road Safety; 2018.

4. Bureau of Infrastructure Transport and Regional Economics (BITRE). Road Deaths Australia-Monthly Bulletins https://www.bitre.gov.au/publications/ongoing/road_deaths_australia_monthly_bulletins: Department of Infrastructure, Transport, Regional Development, Communications and the Arts; [updated 15 March 2024; cited 2024 15 March].

5. Mőller H, Rogers K, Cullen P, Senserrick T, Boufous S, Ivers R. Socioeconomic status during youth and risk of car crash during adulthood. Findings from the DRIVE cohort study. Journal of Epidemiology and Community Health. 2021;75(8):755-63.

6. Pammer K, Freire M, Gauld C, Towney N. Keeping Safe on Australian Roads: Overview of Key Determinants of Risky Driving, Passenger Injury, and Fatalities for Indigenous Populations. Int J Environ Res Public Health. 2021;18(5).

7. Li X, Yu S, Huang X, Dadashova B, Cui W, Zhang Z. Do underserved and socially vulnerable communities observe more crashes? A spatial examination of social vulnerability and crash risks in Texas. Accident Analysis & Prevention. 2022;173:106721.

8. Department of Infrastructure T, Regional Development, Communications and the Arts,. Infrastructure Policy Statement. https://www.infrastructure.gov.au/sites/default/files/documents/infrastructure-policy-statement-20231114.pdf: Australian Government; 2023.

9. Infrastructure Australia. Keeping our cities liveable as they grow: Infrastructure Australia; 2018 [updated 19 November 2018; cited 2024 2 July]. Available from: https://www.infrastructureaustralia.gov.au/listing/speech/keeping-our-cities-liveable-they-grow#:~:text=So%20planning%20for%20our%20major,providing%20affordable%20and%20diverse%20housing.

10. Bureau of Infrastructure Transport and Regional Economics (BITRE). Hospitalised injuries from road crashes - Australia 2011-2021 2023 [updated 22 September 2023. Available from: https://www.bitre.gov.au/publications/ongoing/hospitalised-injury.

11. Austroads. Charting a path to eliminating road death and serious injury: Austroads; [cited 2024 2 July]. Available from: https://austroads.com.au/safety-and-design/road-safety/charting-a-path-to-eliminating-road-death-and-serious-injury#:~:text=The%20Charting%20a%20path%20to,injuries%20to%20zero%20by%202050.

12. National Road Safety Strategy. Fact sheet: Social model approach to road safety https://www.roadsafety.gov.au/nrss/fact-sheets/social-model-approach: Commonwealth of Australia; [cited 2022 17 January].

13. ITF. The Safe System Approach in Action. Paris: OECD Publishing; 2022.

14. 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.

15. Fildes BN, Lawrence B, Thompson L, Oxley J. Speed-Limits in Local Streets: Lessons from a 30km/h Trial in Victoria, Australia. In: Björnberg KE, Hansson SO, Belin M-Ä, Tingvall C, editors. The Vision Zero Handbook: Theory, Technology and Management for a Zero Casualty Policy. https://link.springer.com/referencework/10.1007/978-3-030-23176-7?page=1#toc: Springer; 2022.

16. Yannis G, Michelaraki E. Review of City-Wide 30 km/h Speed Limit Benefits in Europe. Sustainability. 2024;16(11).