



Submission: Draft SA Road Safety Strategy to 2031

August 2021

RAA at a glance



South Australia's
largest
membership organisation



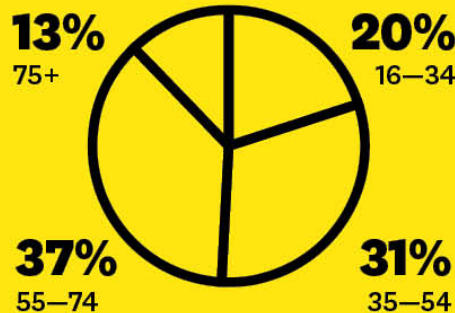
Advocating for South
Australians for over
115 years



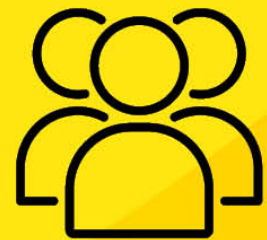
770k+
current members
(55% of SA adults)



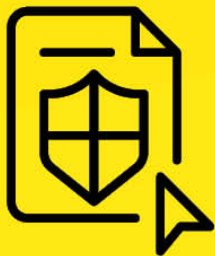
150k+
RAA members are
also cyclists



Our members span
all adult age groups



1000+
staff employed
across SA



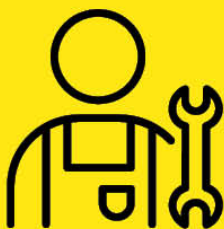
Largest
personal lines
insurer in SA



340k+
roadside callouts
per year



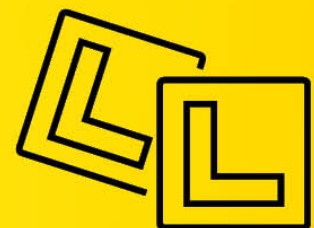
530+
tourism providers
promoted on Experience SA



450+
businesses accredited
through RAA's Approved
Repairer network



29k+
people educated on
road, bike and child
safety each year



23k+
free lessons delivered
to keep SA learner
drivers safe

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Background

RAA is South Australia's largest member organisation, representing more than 770,000 members – about half the South Australian population. Our diverse motor, home and travel expertise means that we can help translate public policy into opportunity for South Australians and advocate for the things that matter. RAA's advocacy efforts support the economic prosperity of South Australia, including its regions – recognising our role as an employer of almost 1,000 people across our state.

RAA has had a trusted advocacy role in transport and mobility developed over the last 118 years. This means we have an expert understanding of South Australia's transport requirements. Our advocacy is evidence-based: we consult and engage with industry, government and our members; and we use open-source data, research and technical field work to develop and test our recommendations.

RAA bases its advocacy on the following three principles:

- **Safe** – A safe system that not only achieves, but outperforms, national and international safety benchmarks. It encompasses safe people, using safe vehicles, on safe roads, at safe speeds.
- **Accessible** – To have a cost efficient, convenient and reliable network that is accessible and inclusive, as an essential part of personal mobility.
- **Sustainable** – Encompasses the needs of current and future generations, and considers financial, societal and environmental factors.

RAA has been actively involved throughout the consultation process for the new road safety strategy, including participating in key stakeholder forums and webinars and providing a written submission last November in response to the October 2020 issues paper.

RAA welcomes the opportunity to provide a further submission with our feedback on the consultation draft SA Road Safety Strategy to 2031. With South Australia missing its previous strategy target of fewer than 80 fatalities by 2020, and with road safety progress having stalled in recent years in many jurisdictions, the new strategy needs to be ambitious, evidence-based and well-resourced to ensure it is placed to deliver road safety outcomes to South Australians.

Positive features of the draft strategy

RAA wishes to support and highlight several features of this draft strategy that we believe will have a positive impact on road safety outcomes in South Australia.

Strategy framework

RAA welcomes the following inclusions in the draft strategy framework, many of which align with our November 2020 submission:

- The strategy **vision of zero lives lost** on our roads by 2050.
- **10-year targets** of at least a 50 per cent reduction in lives lost and at least a 30 per cent reduction in serious injuries (per capita) on South Australian roads based on a 2018-2020 baseline, and in line with the targets being adopted for the national strategy.
- The continued commitment to the **Safe System approach** – and the identification of 2+1 configuration roads, Rural Junction Active Warning Systems (RJAWS) and motorcycle under-run protection as safe system treatments for regional roads.
- The identification of strategic focus areas, and in particular the focus on:
 - **Roads** (a key Safe System pillar that the South Australian Government has scope to improve)
 - **Regional and remote areas** (given they account for most South Australian fatalities)
 - **Aboriginal road safety** (given their over-representation in fatal and serious injury crashes)
 - **Younger and older road users** (given their over-representation in fatal and serious injury crashes)
 - **Walking and cycling** (given that perceived risk and lack of protection act as barriers to active transport and the environmental and health benefits it delivers).
- The development of a **rolling 3-year action plan** (updated annually) and a **monitoring and evaluation framework** designed by the Centre for Automotive Safety Research (CASR) – these will play a critical role in ensuring there is accountability for the strategy's delivery.

Specific strategies

In addition, RAA particularly welcomes the inclusion of the following specific strategies within the draft strategy:

- **Strengthening of driver and rider training** so that novice drivers and riders have more effective training and experience to identify and undertake safe driving practices (strategy 14) – RAA advocates for promotion of greater use of professional driving instruction (for example through bonus log book hours) and for improvements to the process for motorcyclist training and assessment.
- Measures to improve **access to driver training**, with particular emphasis given to Aboriginal people (strategy 15, 20) – RAA advocates for the state government to fund programs that link disadvantaged learner drivers with a volunteer supervising driver.
- Commitments to **normalise the use of safe vehicles**, including influencing the Australian Design Rules (strategy 33), encouraging and possibly incentivising the uptake of safer vehicles (strategy 28-30) and improving consumer awareness of vehicle safety (strategy 25) – RAA advocates for regular reviews of the Australian Design Rules to ensure vehicle safety standards reflect global best practice and for measures that encourage the purchase of new 5-star ANCAP vehicles, including greater promotion of ANCAP at point of purchase

and requiring new government and passenger transport fleet vehicles to have a 5-star safety rating.

- Commitments to positive provision policies for **cycling and walking** and safer and more connected cycling and walking infrastructure (strategy 40-41) – RAA advocates for improved cycling infrastructure that is continuous, well-maintained and, where possible, physically separated from motor vehicle traffic. RAA also believes that footpaths should be included in all residential developments.
- The commitment to improve the **star rating** of high-speed, high-volume roads (strategy 53) – AusRAP star ratings provide a simple and objective measure of the safety of roads and therefore are an effective tool to educate road users about the risks posed by the current road network and to ensure investments are targeted at the roads that most need them. Each incremental improvement in a road's star rating reduces the death or serious injury risk by 40 per cent.
- The commitment to work in **partnership with local government** and build capacity (strategy 69-70) – Given councils are responsible for most of South Australia's road network, RAA believes it is crucial for the state government to provide resources to help them improve road safety.
- Better **data collection, linkages, analysis and sharing**, including better data on walking and cycling crashes (strategy 51, 74-78) – RAA believes road safety interventions should be selected based on where the evidence indicates the risk is highest and what has been demonstrated to reduce risk (either in Australia or in comparable international settings). Where new interventions are introduced, these should be evaluated to measure their impact. Since road safety is a national public health issue, it is most effectively addressed through a similar coordinated effort, including close alignment between national and state strategies and consistent reporting of road fatality and injury data.

Further improvements identified

RAA has identified several areas in the draft strategy which we believe would be improved through the adoption of the following recommendations in order to deliver better road safety outcomes in South Australia.

Strategy framework

- Create a formal **ongoing role for key stakeholder and community engagement** as part of the implementation of the strategy – RAA has welcomed the extensive stakeholder and community consultation to develop the strategy and believes this should continue to enable stakeholders and the community to monitor progress and provide advice to help ensure the strategy's success.
- Australian governments have committed to a vision of zero road crash deaths and serious injuries by 2050, but the draft strategy does not mention **a vision for serious injuries**.
- The 10-year targets use a three-year average to define the baseline, recognising that annual fatality and serious injury figures can fluctuate considerably at a state level. To ensure the success of the strategy is not hostage to these annual fluctuations, it should be measured against the **2029-2031 three-year average** rather than the 2031 figures only.
- Set a target to be among the **top three best performing states** per capita in terms of lives lost and serious injuries by 2031 – South Australia should be striving to be a national leader on road safety and therefore to be outperforming the majority of other Australian states.
- The strategy principles include the prioritisation of safety requirements and safety outcomes when designing, building and upgrading road infrastructure, and planning maintenance (page 16). This principle should go a step further by **making road upgrade funding conditional on achieving a star rating improvement** (or minimum 3-star rating for new infrastructure) – this will ensure that road infrastructure investment delivers objective safety improvements.
- Incorporate **personal mobility devices and motorised mobility devices** into the 'walking, cycling and public transport' strategic focus area to address the safe use of devices such as electric scooters, given their increasing popularity – the draft strategy document makes no reference to personal mobility devices and only one mention of wheelchairs and mobility scooters.
- Identify those **aged 80+** as a particularly high priority within the 'older road users' strategic focus area given the rate of involvement in fatal and serious crashes increases markedly from age 80. Strategies aimed older road users should direct greater resources at the 80+ age group than the 70-79 age group.

Road user behaviour strategies

- **Strategy 1** commits to coordinated enforcement and education campaigns to improve and maintain public understanding about the use of child restraints. However, based on insights from our child restraint fitting and checking service, RAA believes there is a need to **consider child restraints more holistically** to address the 88 per cent of child restraints currently not being selected and fitted correctly. For example, the government could explore the concept of a state-wide child restraint fitting network and review legislation to improve protection for children. Potential legislative changes include: increasing the minimum age for children to travel forward facing from six months to 12 months; providing greater clarity on the use of child restraints by children aged 7-16; ensuring children with disability can access suitable restraints; and requiring child restraints to be used in taxis (just as already required in rideshare vehicles). The strategy would also benefit from referring to child road

safety more broadly, for example educating parents on driveway safety, to better align with the National Injury Prevention Strategy 2020-2030.

- **Strategy 5** commits to better inform and educate the community about safe interaction with heavy vehicles. There should be a corresponding strategy to **better inform and educate the community about safe interaction with vulnerable road users** such as pedestrians and cyclists. Consideration should be given to encouraging all learners to gain experience in driving safely around vulnerable road users, for example by including more questions on this topic as part of the learner's test and ensuring competency tasks cover vehicle positioning in relation to cyclists and cycle lanes and giving way to pedestrians when turning.
- **Strategy 13** commits to address the behaviour of drivers who repeatedly and persistently engage in dangerous driving behaviour through measures such as education, enforcement, preventative health work and counselling. The strategy should also involve **piloting new education rehabilitation programs** that seek to instil better knowledge, skills and attitudes in repeat traffic offenders. There is evidence from program evaluations from other jurisdictions that these courses can be highly effective when they are specific to an offence, when they separate repeat offenders from first time offenders and when they incorporate a cognitive behaviour or psychological assessment element.
- **Strategy 14** to strengthen driver and rider training is limited to novice drivers and riders, but we know that many South Australian road rules are not well understood by existing licence holders. There is an opportunity to **pilot methods of refreshing motorist road rules knowledge**. Drivers need to renew their licence at least every 10 years and this licence renewal point is a natural opportunity to provide universal additional road safety education to motorists. The state government could encourage motorists to review the road rules and complete a road rules quiz as part of the licence renewal process, or go a step further by developing a short, mandatory training module focused on key road rule changes over the past decade and road rules that are frequently misunderstood. The training module could end with a set of questions to test participants' comprehension, with participants allowed to retake the test until they pass. Data on incorrect answers could form the basis of a targeted education campaign.
- **Strategy 16** commits to continuing to deliver road safety education through schools and other organisations, including bike education. Based on our experience as a provider of school road safety education through our free Street Smart programs, RAA sees the need to **expand road safety education further** – road safety curriculum content should be provided on a regular basis over a child's school career to reinforce existing concepts and introduce new skills as children develop.
- An additional strategy should be created relating to **education of international and interstate migrants** to South Australia on road rules, child restraints, licensing, registration and insurance – Through the free education sessions RAA provides to migrant groups, we are aware of a high level of confusion surrounding these topics among those that are new to South Australia.

Vehicles strategies

- **Strategy 26** commits to promoting the benefit and use of advanced vehicle safety technologies through public awareness and education. This strategy should specifically identify **intelligent speed adaptation (ISA)** as a technology that can assist motorists to drive at safe speeds. It is important that consideration is given to how ISA can be best utilised, for example: ensuring South Australia has an accurate and real-time digital roadmap; incentivising voluntary use of ISA; and mandating use of ISA where justified, such as for drivers who commit multiple speeding offences.

- In line with incorporating personal mobility devices into the strategic focus areas, an additional strategy should be created relating to facilitating **the safe and legal use of personal mobility devices** in South Australia (as per recent amendments made to the Australian Road Rules).
- In line with incorporating motorised mobility devices into the strategic focus areas, an additional strategy should be created relating to **improving the safety of motorised mobility devices**. Potential initiatives include exploring a no-cost registration process to protect users against devices without appropriate safety standards.

Roads strategies

- **Strategy 46** commits to developing an evidence-based model to guide maintenance investment and maximise the safety of existing road assets. However, there is a need to also **ensure maintenance funding is sufficient to address the current backlog**. Last year, Infrastructure SA predicted that the \$780 million renewal backlog across the South Australian network would increase to \$1.2 billion by 2024 unless there is an injection of funding to dramatically increase the rate of network remediation. The safety of two-wheeled road users such as motorcyclists and cyclists is particularly compromised by poor road surface conditions and localised pavement failures.
- **Strategy 53** commits to improve the star rating of high-speed, high-volume roads but does not set a target against which to measure this improvement. This strategy should be supplemented with a commitment to **achieve a three-star rating or better** on these roads. This would align with the National Road Safety Action Plan 2018-2020, which aimed to achieve three stars or better for 80 per cent of travel on state roads. iRAP has calculated that, in high-income countries, investment to ensure at least 75 per cent of travel is on 3-star or better roads has a benefit-cost ratio of four.
- The overall strategy identifies risk rating of high-volume, high-speed roads as a key performance indicator (page 63). However, the strategy does not explicitly say that the star rating of high-volume, high-speed roads will be published. Star ratings of the major state highways and roads that form part of the national highway network should be published to identify where the most effective road safety investments can be made, taking into account their function in the network and use. **Published star ratings** post-investment can also be used to demonstrate the positive impact that investment in respective projects across the network can provide in improving both safety and amenity.

