Office of Road Safety
GPO Box 594
Canberra ACT 2601

Response to: Consultation draft National Road Safety Strategy 2021 - 2030

This submission has been developed by Queensland Walks and Victoria Walks with an interest to improve the safety for all people who walk in Australia, and especially for people and stakeholders who our organisations represent in Queensland and Victoria.

We would like to support and acknowledge submissions by fellow walking advocates Walks Sydney, as well as speed reduction advocate 30 Please to complement our submission.

Introduction

Queensland Walks and Victoria Walks acknowledge the work of the Office of Road Safety on the draft National Road Safety Strategy (NRSS) in an effort to reduce fatality and injuries on all Australian roads and footpaths. We support the aim of 'zero deaths by 2050' with a Vision Zero approach to all road and footpath users who walk and wheel[1].

We are frustrated and alarmed with the high incidence of fatalities, injuries and near-misses (not represented in the data) of people walking in Australia, especially during 2020 when vehicle volumes were lower. The downward trend in road deaths over the decade has been more pronounced for people in vehicles than for people walking (BITRE, 2019).

Of people killed on the roads, 13-14% have been pedestrians for the past 20 years. In 2019, nearly half (46%) of the people killed while walking were 60 years or older. The number and proportion of older pedestrians killed has been steadily increasing over the last 10 years (Figure 1). People 70 years or older represented 36% of all pedestrian fatalities in 2019. In comparison, they represented only 11% of the Australian population in 2017 according to the ABS. There were 37 pedestrians aged 80 or over killed, including eight in their 90s. With the ageing of the population and the importation of vehicles with poor safety standards protecting people on foot, this is likely to get worse.

[1] When referring to: 'walking', 'walking and wheeling', or 'pedestrian', we use the Queensland Walking Strategy definition: 'A pedestrian is someone who is walking or running, or using a: wheeled recreational device - such as rollerblades, skateboards, roller skates and foot scooters. personal mobility device - such as a rideable. motorised mobility device - such as wheelchairs, motorised mobility scooters and electric wheelchairs." www.tmr.qld.gov.au/Travel-and-transport/Pedestrians-and-walking/Queensland-Walking-Strategy

Prioritising the safety of people who walk and wheel: words and images

The NRSS appears to be primarily focused on vehicle use and uses infographics and imagery that minimises the safety of Vulnerable Road Users (VRUs). VRUs are discussed in more detail on p.18 of the NRSS however we recommend that the VRUs are prioritised at the front and centre of this strategy.

Actions for VRUs in the NRSS are manifestly inadequate as there are no actions specifically addressing pedestrian road trauma. Given that one in seven to one in eight of all road fatalities are people walking, and an increasing proportion of those killed or injured while walking are older Australians, the NRSS must have walking specific actions if it is to result in a "significantly reduced burden on our economy and society from road crashes".

Recommendation

1. The hierarchy of road use is applied, with acknowledgement of the most vulnerable to trauma and injury at the start of the strategy and prioritised throughout. VRUs should be the leading priority of the nine priorities discussed.
2. The definition of 'road' and 'transport' should include or reference the full extent of transport infrastructure options, and should include footpaths, kerbs and crossings, signage (and more) as part of the road environment.
3. Vulnerable Road Users (VRUs), people who walk or wheel, are clearly defined and included at the front and centre of the document rather than an outcome of safe road use.
4. More detail on accessibility, inclusion and equity is included in the NRSS document. Our must vulnerable in road environments are women and children, older people, people with a physical and cognitive disability or impairment who rely more on walkable spaces, and good public transport connections.
5. Public Transport is discussed as part of NRSS, given its potential to replace comparatively dangerous private vehicle trips with much safer trips.
6. Changes to the use of photos, images and infographics that will reflect all road users. This includes (but not limited to):
    - P. ii, 4 images: We recommend using images that reflect the full road environment including footpaths, and reflect all road users at the commencement of the document. These images are important to set the tone.
    - P.6 image We would encourage the use of imagery to incorporate a footpath in 'safe roads' (p.6) so that it demonstrates all road users. Footpaths also appear in regional areas and this should be incorporated in imagery.
    - P.6 Vulnerable Road Users infographic should appear at the top, and prior to Vehicle Safety.
    - P. 10 Removal of the sentence: 'Driving and road use is a significant part of the Australian way of life and business.' We would encourage that all road users are acknowledged as not everyone drives, and many who don't drive are impacted by near-misses and road trauma.
    - p.10 use of the word 'drive down road trauma' – replace with 'minimise road trauma for all road users'.

Movement and Place

We are supportive of the Safe System approach and the adoption of a Movement and Place framework, both of which can guide better and safer planning appropriate to the local environment. We are concerned however that a Safe Systems Approach of 'Movement and Place' methodology is not being readily adopted nor reflected in examples of newly designed road projects that are impacting the safety of people who walk and wheel and especially our most vulnerable.

The statement (p.10) *'This approach informs road design and is critical to the decisions we make, including those on speed management to ensure that we can drive down road trauma in urban, regional and remote communities.'* is often not the case in many road projects released where 'movement' (traffic flow, congestion, road hierarchy) is prioritised rather than 'place'.

Evidence Based policy

We strongly suggest material from' Understanding Pedestrian Crashes in Victoria (Victoria Walks, July 2020) will be helpful in forming more detail in designing road environments safer for people who walk and wheel. Whereas the data in this report is Victorian specific it provides important insights relevant to all states and territories.

Recommendation

1. Include evidence that reflects pedestrian-specific or VRU needs.

Infrastructure Planning and Investment

This area of focus has a vital role to play in ensuring the safety of people who walk and wheel. We would like to see integration of safety with infrastructure planning and investment to ensure that future infrastructure is built (and refurbished) with pedestrian safety and amenity as a priority.

Recommendation

We recommend that infrastructure planning and investments should prioritise pedestrian safety at a minimum and require features such as:

- Connected, continuous and well-maintained footpaths.
- The removal or remediation of slip lanes (using raised pedestrian crossings, traffic signals, etc.)
- Avoiding the use of roundabouts in locations with a posted speed of 50km/h or higher
- Review of pedestrian wait times at signalised intersections which cause 'non-compliant' behaviour.
- Investment in pedestrian crossings on all legs of signalised intersections, or option for 'scramble' style intersection.
- Reduce risk in sun exposure with options for all weather (eg ensuring footpaths have good street tree coverage).
- Shared paths are minimised.

Speed reduction

Research has clearly established that vehicle speed is a key factor in road trauma. Higher speeds result in more crashes as well as increasing crash severity. Pedestrians are not protected the same way vehicle occupants are and are more likely to be injured as a result of a crash. In a crash between a vehicle and a person walking, the risk of death for the person increases as vehicle speed increases. Speed reduction is critical to ensure that crashes involving people walking are survivable and preventable. Lower speeds will also provide benefits in ensuring that people are encouraged and feel comfortable and safe to walk beside streets and roads. Speed reduction can also reduce noise and other emissions, resulting in cleaner and more pleasant streets.

Recommendation

1. Lowering speed limits to 30kmh in areas of high pedestrian activity, on neighbourhood streets, in school zones and surrounding streets, and activity centres.
2. Reduce the default urban speed limit for local roads from 50 to 40 km/h.
3. Review speed limits on urban roads with a current speed limit of 60km/h or more, with a view to providing safer speeds.
4. Review the speed reduction processes in each state and territory.

Priority planning

Many state and local governments have policies that place walking at the pinnacle of planning and safety documents. However, this is rarely reflected in actual funding, planning and delivery.

Recommendation

1. This strategy should require local and state governments to ensure that the safety of people walking and wheeling is considered a priority. Coupled with this requirement, the importance of infrastructure funding to facilitate walking and make walking safer should be emphasised.

Safer vehicles

The Federal government has a crucial role to play in regulations approving vehicle imports. We urge the Federal government to ensure that all vehicles imported meet current European vehicle safety standards. Specifically, there is an urgent need for the safety of non-occupant road users or vulnerable road users that is, motorbike riders, cyclists and pedestrians to be a priority.

A safe vehicle is not safe if it protects the occupants but **kills motorbike riders, cyclists and pedestrians. The Australian New Car Assessment Program (**ANCAP) provides important information for consumers about the safety of a motor vehicle. In recent years there have been several motor vehicles that have failed the vulnerable road user test for cyclists, yet are available for sale, including some that were given an overall score of 5 stars, despite failing the cyclist test including:

Motor Vehicle	ANCAP rating	AEB (Cyclist) result
Mazda BT-50	5 stars	3.87 out of 9
Isuzu D-Max	5 stars	3.87 out of 9
Kia Seltos	5 stars	0.0 out of 9 The system detects pedestrians but not cyclists.

Recommendation

1. The NRSS clearly states the need for concerted action to ban the importation and sale of motor vehicles that fail the ANCAP safety tests for vulnerable road users.
2. The Office of Road Safety takes a leadership role to prevent these motor vehicles from entering the Australian motor vehicle fleet.

Heavy vehicle safety

We support the mandatory introduction of heavy vehicle safety technologies that increase the visibility of people walking and cycling, as well as better training and education of drivers to be aware of vulnerable road users. We refer to the deaths of both Rebekka Meyer (2014) and Carolyn Lister (2020) in Queensland, both of whom died as a result of not being seen by a heavy vehicle. The Coroner's Report in the death of Ms Meyer recommended that:

> 7.a. *Conventional shaped heavy vehicles should be prohibited unless they are fitted with appropriate technologies to warn the driver of any obstacles or other road users within the forward blind spot of the truck.*

We support a star rating system so that construction sites or local governments can mandate that only vehicles of a certain safety level are permitted to access specific streets and sites. This is especially useful in areas of high pedestrian usage.

New technologies

Any strategy for the future needs to consider new technologies that have the capacity to improve or detract from safety. Many recent and emerging technologies have the capacity to make walking safer or less safe, depending on the application and how the technology is planned and implemented. E-mobility devices on footpaths, shared paths and roadways are an example, and should be discussed in the NRSS.

Recommendation

Include a discussion and encourage research on the following items of new technology in the NRSS:

- Pedestrian detection technologies and smart devices: affixed to, vehicles, traffic lights and in emerging technology.
- Acoustic Vehicle Alerting System (AVAS) in new technology such as electric vehicles or silent vehicles or devices to ensure that vision impaired people are aware of nearby vehicles.
- Pedestrian data collection via counters, to provide data about the number of people using spaces.
- Artificial Intelligence (AI) and machine learning systems to detect potential issues such as where vehicles aren't giving way, near misses, gaps in infrastructure or maintenance issues in infrastructure.
- Reference the role and impact on the pedestrian network of the popularity of new technology such as e-mobility devices, particularly where road rules allow devices on footpaths.

Road safety education

We recommend that state and federal governments undertake more comprehensive driver centred road safety education campaigns and education with the aim of:

- normalising walking and wheeling and encourage more people to be active
- emphasising the need for people who are driving to consider people who walk or ride, and give way where road rules require.

Enforcement

We recommend that state governments increase their commitment to enforcement of road rules, especially those road rules that affect people who walk and wheel, such as giving way to pedestrians, intersection and speed violations.

We thank you for the opportunity to comment on this vital strategy and for taking the time to read our joint submission. If you have any queries regarding this submission please contact Anna Campbell on info@queenslandwalks.org.au or 0419 728 670.

Yours in health and walking,

Anna Campbell
Executive Officer, Queensland Walks

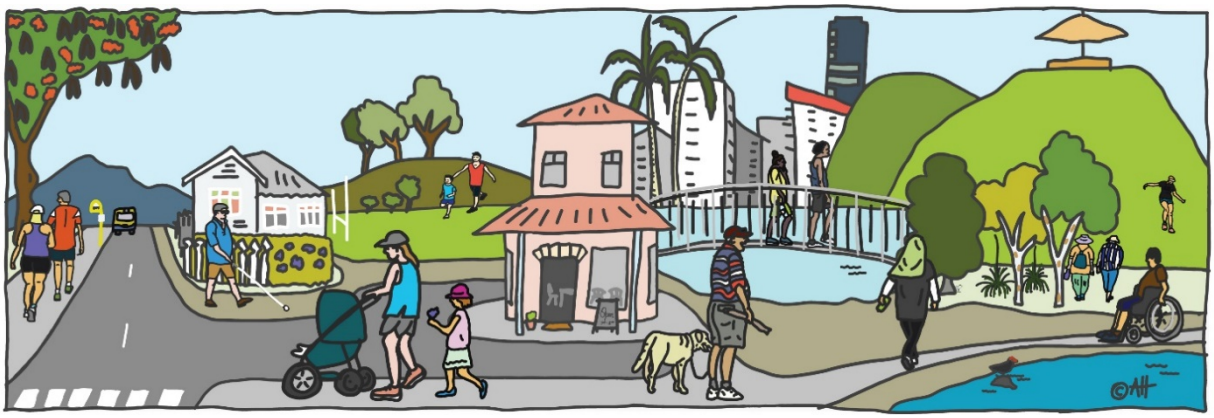
Ben Rossiter
Executive Officer, Victoria Walks

About Queensland Walks

Queensland Walks is a community based organisation which advocates for more walkable places which will mean more Queenslanders walk. Our aim is to improve the conditions and profile of walking in Queensland, to support and encourage government, organisations and agencies to improve policy and funding priorities to enhance walking.

About Victoria Walks

Victoria Walks is an evidence-based health promotion charity, leading the move for walkable communities in Australia since 2009.



Appendix.

Figure 1. Fatalities on Australian roads for the past 20 years show older pedestrians are increasingly at risk (data from BITRE)

	All fatalities	Pedestrian fatalities					
Period	Annual average	Annual average – all peds	Proportion of all road deaths	Annual average – peds 60+	Proportion of peds killed who were 60+	Annual average – peds 70+	Proportion of peds killed who were 70+
2019	1188	159	13%	73	46%	58	36%
2014-2018	1201	166	14%	70	42%	50	30%
2009-2013	1322	176	13%	66	37%	49	28%
2004-2008	1570	213	14%	75	35%	56	26%
1999-2003	1731	271	16%	96	36%	70	26%