Attention: To the Office of Road Safety  
Subject: Feedback draft National Road Safety Strategy for the decade 2021-2030

Submission By 30Please  
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I About 30Please and our Vision

30Please is a community campaign that advocates for 30km/h to become the default speed limit in residential areas in Australia. 30Please is a member of CWANZ.

![Children walking or cycling to school](image)

30Please shares the Office of Road Safety’s Vision of Zero deaths by 2050. However, we are concerned that the strategy in its current form is set to miss the target to reduce the rate of deaths from road crashes per 100,000 population by at least 50 per cent by 2030. The previous strategy has missed its target and the proposed strategy is not clear enough on necessary steps to achieve the target this time. Road crashes are a leading cause of death for children aged 1-14 in Australia.¹ The inaction to take necessary steps to create a forgiving road system in Australia also means that our children are less likely to walk and cycle to school than their international peers. Currently, over 70% of children and 91.5% of young adults are not meeting daily physical activity levels.

Il Pedestrian and Cyclists on Australian roads need to be safer

Pedestrians and cyclists run a high risk of being killed by cars. These groups are also the least likely to harm other road users.

Given this is a 10-year strategy, it is important to consider how transport is likely to change over the next decade. A combination of technology advances, climate change mitigation strategies and higher focus on health benefits of active transport should hopefully lead to higher adoption rates of active travel.

Over the next decade, Australia should have significantly shifted the mode of travel for many shorter journeys from private car use to walking and cycling. With e-bikes and cargo e-bikes being widely available, older people and families with small children and logistic companies for the last mile delivery might have shifted to this transport mode.

Even though Australia has an extremely low share of trips made by active transport compared with other OECD countries, pedestrians and cyclists account for 20.9% of road fatalities in NSW (2020).\(^2\) In NSW the only categories of road users where no progress in reducing the road toll has been made from 2019 to 2020 were pedestrians and cyclists.

Without significant changes to our city road systems, there is a high risk that many new active transport users will be killed on Australia’s roads. To avoid these deaths the National Road Strategy should proactively create a safe and connected walking and cycling network. This needs to be done quickly, and ideally at a low cost. Reducing the speeds of motorized traffic is an effective, low-cost strategy for achieving such a network.

III The Case for lower urban speed limits

We now see a growing acceptance of lower speed limits across the world and a notable spread of area-wide and even city-wide 20 mph/30 km/h limits. For example, 13 million people live in default 20 mph zones in the United Kingdom, which are publicised using the slogan ‘20’s Plenty for Us’; 38 per cent of the Swiss population live in 30 km/h zones; and Spain’s new general road law envisages 30 km/h limits on most city streets. As far as particular cities are concerned, Edinburgh’s 20 mph zones cover 80 per cent of the city’s streets; Paris has announced plans for lower speed zones

across the whole city; and in the United States, Boston and Seattle are developing lower speed zones and Portland had a default 20 mph speed limit on 70 per cent of its street mileage by 2018. The UN has just announced the theme for the 6th UN global road safety week: 30km/h for urban areas.³

In Australia, area-wide 30km/h limits in urban areas should be created, allowing for higher speed limits on arterial roads where infrastructure to protect cyclists and pedestrians can be provided. At speeds of below 30 km/h, cyclists and micro mobility devices can mix with motor vehicles in relative safety.

There is clear evidence that 30 km/h speeds in residential streets dramatically improve road safety. The success of these 30 km/h (20mph) speed limits in reducing road crashes is supported by recent research. A Bristol study found that a 20 mph city-wide speed limit intervention led to a city-level reduction of fatal injuries of around 63%. The authors suggested that the city-wide approach to reducing speeds encouraged a more general behaviour change in drivers, which in turn contributed to reducing injuries across the city.⁴

Many neighbourhoods in regional Australia lack footpaths and there are no funding plans in place to provide these in the near future. This safety concern needs to be addressed urgently. According to Austroads, the most effective measure to date to increase pedestrian safety is the adoption of lower urban speed limits.

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³ https://www.unroadsafetyweek.org/en/home#letter
Given that drivers spend the majority of their time on arterial roads, the effect on travel time and perceived inconvenience will be minimal. The introduction of lower speed limits needs strong leadership, as some drivers overestimate the effect of 30km/h limits on travel time, and others might not be in favour of being instructed to share the road with other road users.\(^5\)

A well designed social marketing campaign highlighting the advantages of lower speeds – improved safety and also increased liveability – should be rolled out. Local advocacy groups can help to embrace the change to healthier neighbourhoods.

While the majority of Australians already supports lowering speed limits\(^6\) in neighbourhoods, the acceptance should increase after implementation. This would be consistent with experience from countries like the UK and Germany. Some smaller trials in Melbourne and New Zealand where 30km/h limits had been rolled out before 2020 have been successful and have been even more popular after people experienced the benefits.\(^7\)

In many other countries, physical traffic calming measures in 30 km/h (or 20 mph) zones are deemed to be essential to discourage drivers from exceeding the speed limit. However, in Australia we should aim to take advantage of a culture where driving above the speed limit is less common than in many other countries.

Enforcement, high penalty fees and the use of telematics for new drivers\(^8\) and fleet drivers can help with high compliance with the 30km/h limits.

Some physical measures could be used to slow down traffic, but these should be targeted at locations where speed and road danger is highest, similar to the roll out of the 20mph default speed limit in Wales.\(^9\)

Intelligent Speed Assistance (ISA), Automated Emergency Braking (AEB) with vulnerable road user detection, enlarged head impact protection zones, direct vision requirements and Blind Spot Detection Systems for heavy goods vehicles should be made mandatory for new cars. Given the EU had announced this new legislation already\(^10\), most car makers should be ready to provide these features at minimal extra costs.

By 2030 the share of new cars being EVs might exceed the number of petrol powered cars.\(^11\) These cars will help to reduce air and noise pollution. Given pedestrians cannot hear these quiet cars approaching, the need for pedestrians to be given priority to cross the road is even more obvious. ‘Stop, Look, Listen, Think’ to cross the road safely will be less effective in the future. It is important to put more responsibility on the road user with capacity to cause harm.

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\(^6\) The Heart Foundation has found in a survey conducted in 2020 that the majority of Australians supports lower speed limits in neighbourhoods. Only 13% of people surveyed were unsupportive. https://healthyactivebydesign.com.au/resources/publications/what-australia-wants-report
\(^7\) https://www.20splenty.org/20mph_choice
\(^9\) https://gov.wales/20mph-task-force-group-report
On all 30km/h streets drivers should be encouraged to give pedestrians priority when they want to cross a road. A Canadian habit of pedestrians giving a hand signal when wanting to cross a road and making eye contact with the driver should be established in Australia. Given the short braking distances and the wider field of vision when driving 30km/h, drivers will be more able to anticipate and react to people wanting to cross the road.

On arterial roads, pedestrian priority crossings and traffic lights need to be in place for people to cross the road.

A clearer hierarchy of roads needs to be established that makes it more predictable where to expect people walking and cycling. The legacy road rules and speed limits in Australia make it hard to understand where drivers should go slowly and share the street and where drivers should go fast to not hold up the traffic.12

Congestion in big cities can ease as less people will use cars for short distances. The last mile delivery will become safer and more efficient. In cities like Sydney, delivery companies currently spend a 1/3 of their time looking for parking and often another significant part of their time stuck in congestion. Creating a safe and connected cycling network will mean many last mile deliveries can be made by e-cargo bike, reducing the number of delivery vans used in urban areas.

Overall, the reduction of speed limits will not just benefit vulnerable road users but will significantly reduce crashes overall. According to the WHO a 5% cut in average speed can result in 30% reduction in the number of fatal crashes.

12 https://medium.com/@lena_80140/why-drivers-will-thank-you-for-30km-h-limits-888a7f7896ed
The strategy of reducing speeds will achieve the goal 50by30 – the focus on vulnerable road users is the right approach as people inside cars are getting safer through innovation. However, safer roads and reduced speeds are needed to protect people outside cars.

IV Conclusion:

Without a strategic approach to make people outside cars safer, the strategy will miss its target – potentially seeing an increase of the number of people being killed on Australia streets.

A transport strategy aiming for an uptake of walking and cycling similar to what we see in other developed countries without aligning with global best practice in road safety for vulnerable road users and speed limits can be a deadly strategy. The overarching goal of the strategy should state: “Any road users must be free from road harm as well as free to walk/cycle/wheel/ride/drive.”

A) Action Points to include in your strategy:

1. Implement the UN mandate for 30km/h limits in urban areas
2. Prioritise the safety of vulnerable road users and put more responsibility on motorised road users to watch out for them
3. Mandate a safe and connected walking and cycling network: roads with speed limits more than 30km/h need pedestrian priority crossings, footpaths and cycle lanes
4. Make new life saving technologies mandatory: for example Intelligent Speed Assist will help with compliance for lower speed limits

B) Change the images used in your strategy:

The Australian Government supports safe road environments for all road users—pedestrians (which include most wheeled mobility and recreation devices such as skateboards, roller skates and roller blades) and cyclists. The images in your strategy suggests that you are mainly focused on people inside cars:

Safe Roads should also show a pedestrian priority/person crossing on the road. Safe Road Use could show a car driving at a safe distance next to a bike. Australia has some of the highest seat belt wearing rates in the world (99% in NSW)\textsuperscript{14} but has one of the worst attitudes among OECD countries when it comes to showing respect to vulnerable road users like cyclists. Speed Management should be at least equal in size.

Safe road use could be subtitled: “Road users know and comply with road rules and take responsibility for the safety of themselves and others, especially the vulnerable.”

We thank you for the opportunity to provide you with our feedback to the proposed strategy.

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