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Emailed: roadsafetystrategy@infrastructure.gov.au

Dear Ms O'Neill

Re: draft National Road Safety Strategy for 2021-30 ('the Strategy')

Thank you for the opportunity to provide comment on the draft Strategy and for making online forums available to discuss issues. The Local Government Association of South Australia (LGASA) has taken an active role in advocacy and support for South Australia's 68 councils on road safety and in 2019, released its '[Local Government Guide to a Road Safety Strategy and Action Plan](#)¹' ('the Guide').

The LGASA has also taken an active role as a stakeholder in development of the South Australian 'Road Safety Strategy' and made a [submission to the consultation](#)² on that Strategy. The LGASA is pleased that efforts are being made to ensure alignment between the two strategies to support implementation and effectiveness at both a Federal and state government levels.

There are many ways in which local government can support the implementation of Federal and state government strategies, as road managers and fleet purchasers, employers and urban planners, and the LGASA urges the Office of Road Safety to continue to involve local government as a key stakeholder.

Upon consideration of the draft Strategy, the LGASA supports:

- The three key themes of Safe Roads, Safe Vehicles and Safe Road Use underpinned by Safe Speeds.
- The Nine Priorities of:
 - Infrastructure Planning and Investment;
 - Vehicle Safety;
 - Indigenous Australians;
 - Regional Road Safety;
 - Heavy Vehicle Safety;
 - Vulnerable Road Users;
 - Remote Road Safety;
 - Workforce Road Safety; and
 - Risky Road Use.

These Priorities align with the LGASA's Guide.

- The emphasis in the Strategy on implementation and actions which seek to raise the profile of road safety.

¹ [LGA_Guide-to-a-Local-Government-Road-Safety-Strategy-and-Action-Plan-6.9.19.pdf](#)

² https://www.lga.sa.gov.au/_data/assets/pdf_file/0032/808538/ECM_719843_v14_LGA-Submission-to-Road-Safety-Strategy-1.pdf

However, the lack of emphasis on governance in the Strategy raises concerns about how actions will be implemented, their timing and responsibility.

The role of local government

The Strategy includes long-term directions which support local government however, these need greater emphasis. In particular, councils need:

- support in building capability and capacity, through sharing skills and expertise in a structured way between levels of government;
- support in seeking appropriate funding for infrastructure projects;
- greater availability of data which helps inform road safety audits; and
- facilitating ongoing research to continue to inform policy.

For example, there is currently no mechanism for the South Australian Department of Infrastructure and Transport to share skills or expertise with local government. There are also opportunities for greater sharing of information about projects, to ensure they align with council projects.

It should also be noted that that road safety audits do not automatically equate to a safe system road assessment, which may need to be in addition to a road safety audit. This reveals an opportunity for upskilling road engineers to understand these higher standards.

The Strategy could better reflect the diversity of local government. While it is understood that some consultation was undertaken with local government stakeholders, including the Australian Local Government Association, there is a risk that only councils which are well-resourced can permit the time for a staff member to provide input, which may be reflected in the Strategy. This could result in an understanding of local government which reflects the capacity and capability of larger councils, rather than the many councils which do not have a traffic engineer or staff dedicated to this role. The difference in capacity between a large metropolitan council and a small regional council is completely different, and targeted approaches are required to ensure they receive appropriate support.

Movement and place

The LGASA supports the emphasis in the Strategy on 'Movement and Place' and the opportunities this provides for creating liveable communities and appealing cities which do not focus solely on cars. This approach aims to achieve integration of cars and other modes of transport through recognition of placemaking and the role of local streets, which provides opportunities for integration with local government projects.

The Movement and Place discussion on page 6-7 of the draft Strategy needs greater explanation for the non-expert user. It is suggested that illustrations and examples would assist here. Similarly, the reference to Movement and Place at page 18 requires articulation to understand how this might work in practice.

Infrastructure planning and investment

The Strategy's emphasis on driving and road use is understood as the reality of Australian transport, but the LGASA considers it a lost opportunity if the Strategy does not address the need to move away from roads as the only solution to a safer transport system. It is understood from the Strategy's online forums that there has been a decision made not to focus on active and public transport, but the LGASA believes

this is integral to the solution and must be addressed as part of the Movement and Place approach. The challenges of alternative transport in regional and remote areas are understood, but to not tackle this issue is to accept that it is not possible to change.

Consistent with the Guide, the LGASA supports a multi-pronged approach that addresses a range of social issues, such as the health and environment benefits of public and active travel, supporting non-car users such as older people and other vulnerable users. Support is required for alternative means of transport so that people who do not drive are not seen as second-class citizens, isolated from social contact and from being contributing members of society. Local government also has a role in supporting alternative travel modes, such as community buses, particularly in more remote areas.

While Australia has designed its system to be reliant on cars, has the Office of Road Safety considered how road safety could be addressed by placing further emphasis and action in the Strategy on the system we should have, as well as the system we have?

Regional roads

The LGASA supports this focus, consistent with the Guide. However, the Actions at page 15 are not very clear without responsibilities attributed to them. For instance, the development of network safety plans. Who would do this and how would it be funded? The reference to a 'Regulation Impact Statement' also needs explanation.

The Strategy's recognition of the differences with major cities, regional and remote roads due to their unique issues is supported. However, this needs to be followed up with unique solutions.

Remote areas

Consistent with the Guide, the Strategy acknowledges the challenges of remote roads and the communities in these areas. A range of solutions is required to address these complex needs, including alternative transport options.

Vehicle safety

Consistent with the Guide, local government has an important role to play in supporting improved vehicle safety as fleet purchasers and major employers.

The LGASA encourages the Office of Road Safety to support linkages with the Federal Government's electric vehicle strategy in development. The Government's [Future Fuels Strategy Discussion Paper](#) focuses on a 'fleets first' approach as the best way to upgrade the wider road fleet to electric vehicles. Road safety is an important outcome of this approach, encouraging the purchase of newer cars with better safety features and supporting delivery of a reduction in the age of vehicle fleets.

Heavy vehicle safety

While heavy vehicle safety is supported as a priority, this section on page 9 is rather vague. The action to 'Strengthen national heavy vehicle operational regulation' is unclear as there is currently a review of the heavy vehicle national legislation underway. The reference to 'protect all road users from conflicts with construction vehicles' is then rather specific compared to the others, and it is unclear how this might be achieved.

Workplace road safety

Consistent with the Guide, local government has an important role to play in supporting fleet purchase and safe driving policies for workers, consistent with WHS policies, as well as the Guide.

Indigenous Australians

The LGASA supports policies which target the unique challenges of indigenous Australians.

Vulnerable road users

The importance of the Movement and Place approach in supporting vulnerable road users is consistent with the Guide. Approaches such as placemaking support social access and interaction and avoid isolation of people who might otherwise not be independent. For example, when older drivers are no longer able to drive, it could be a more positive experience through transitioning to other transport modes. However, the range of vulnerable road users may not all be able to be covered by the same approaches.

Risky road use

The reference to risky road use and the need to change culture refers to the 'social model' which is supported (after explanation from the online forums as to what this is). Greater explanation is required here, with a focus on culture change as well as education.

Document structure

The following comments relate to possible improvements about the way the draft Strategy is structured and points of clarity.

The long-term directions at page 3 of the Strategy need more explanation, for example 'measure transformation of the transport system' and 'adoption of the social model to influence prioritising and safety'. The social model is understood following explanation in the online forum, but this is not apparent from the Strategy itself.

The infographics on page 5 need explanation, such as how/why hospitalised injuries are increasing but deaths are reducing.

From a document structure perspective, it is not clear how the 'Principles' are embedded in the Nine Priorities and this requires greater integration and explanation. The Nine Priorities should also use the same wording throughout, for example, 'regional roads' compared to 'regional road safety' and referred to in the same order at both pages 2 and 15.

The three key enabling actions of transformation of the system, data and cultural change need to be embedded in the document, as do the priorities at the end of the Strategy.

Implementation

In closing, the LGASA would like to reiterate a key point that we appreciate has also been made by our colleagues in other state and territory associations. Simply put, increasing expectations of councils in the National Strategy without meaningful engagement and support at a local level is unfair and unrealistic.

Has the Office of Road Safety considered how the National Strategy could recognise the very real funding constraints and operating environments of councils?

I welcome the commitment from the Office of Road Safety to support councils to build road safety capacity and capability, through facilitating peer to peer support and training for local government and building road safety knowledge and capacity. This will require a two-way dialogue with councils to ensure that they feel supported and engaged in the process, particularly as the 2021-2025 Action Plan is designed.

Beyond the valuable input and support you are receiving from ALGA; it is state and territory local government associations that are in a unique position to ensure that the experience and needs of our member councils across Australia are reflected in the implementation of the National Strategy.

Thank you for the opportunity to make this submission. The LGASA would be pleased to provide greater detail or be involved in ongoing discussion if that is useful to you.

Yours sincerely

Lea Bacon
Director Policy

