

Submission on the National Road Safety Strategy

One point of focus: Speed

Road safety strategies in Australia are more focussed on speed to the exclusion of other factors than any comparable countries. This particularly true in Victoria and South-East Queensland. The incessant focus on speed has led to the neglect of other areas, particularly at a time when spending on country roads is falling behind and is increasingly politically directed. Speed limit reductions have been used as a tool to patch over fundamental issues with country roads in particular.

While Australia's speed limits are often higher than those on continental Europe, this is of somewhat limited comparative value as there is a greater tolerance to exceeding the speed limit there. Furthermore, the UK has speed limits on country roads very similar to those of Australia yet has one of the best safety records, generally ranking third behind Sweden and the Netherlands. This includes roads such as popular motorcycling routes where widespread speed limit reductions have been employed in recent years, causing great damage to the motorcycling community. In the UK almost all speed limits on rural roads, except where there is increasing development, are 60 mph. It retains a thriving motorcycling community and has a better crash record than any Australian state. The widespread reductions used here simply aren't found. Furthermore, even though studies claim a high acceptance of lower limits once implemented this ignores the fact that a choice usually isn't given. Where it is higher speed limits are universally preferred. One of the main triggers of the 'Yellow Vest' protests in France was lowered rural speed limits.

The academic and policy focus is more on speed than in practically any other country. Although penalties for very high range offences are similar, Australia is far harsher than about all European countries on low to mid-range speeding offences. This is especially true in terms of monetary penalties, with speeding fines being several times higher in Australia than, say, the Netherlands or Germany. Most European countries also do not have the draconian 'hoon laws' that a large number of Australian states have implemented. There is a significantly higher bar to impound a vehicle and they are usually only seized if they are not road-legal. The arbitrary and capricious laws in Australia, which are massively disproportionate for some offences, are inspired more by loud voices than by evidence.

Furthermore, there is far less tolerance than in European countries. Spain, another country with a better road safety record than Australia, explicitly allows cars and motorcycles to exceed the limit by 20 km/h when overtaking on rural roads. This allows the road systems to flow better and reduces driver frustration. In comparison Australia will penalise anyone exceeding the limit at all (minus the small tolerance) under the idea that 'exceeding the speed limit by 5 km/h doubles the chances of an accident'.

Advocates for lowered speed limits in Australia never seem to consider that their being tolerated in Europe is dependent on a very large amount of discretion. This is particularly true for 30 km/h speed limits in urban areas. Speed surveys, done yearly in Britain, consistently show that in 20 mph zones most vehicles are over the limit – this was 86% in

2019¹. In the Netherlands 40-50% of drivers exceed speed limits on any road² and testimony by the Swedish Transport Administration to the Victorian Parliament revealed that 59% of drivers exceed the speed limit there.

The reliance on concealed, mobile enforcement, especially through camera cars and vans, is well off the scale compared to Europe. Victoria and SE Queensland are particularly notable. On popular motorcycling routes it is not uncommon for four from a various selection of concealed mobile enforcement types to be deployed over less than 20 km. Such deployments are unheard of in Europe, even during special operations or in very high-risk areas. If Victoria and SE Qld get a 10/10, then most European countries are a 2-3/10. A contrasting example is the Netherlands, where mobile enforcement is relatively rare and is almost never concealed, being well signposted. They are the second safest country on earth. It is notable that the supposed overall speed and crash reductions popularly attributed to an effect of concealment are still observed. Mobile enforcement is almost certainly massively overused at the cost of other strategies.

To its credit the strategy here does not overemphasise speed to the same extent that the state governments and academia have, but there is still too much focus on it. That an RIS is will be prepared on reducing the default limit shows this. This is a particular hobby horse of certain academics and if the community was given a genuine choice would never be considered. Furthermore, the floated idea of reducing speed limits on perceived issue roads continues the issue of not addressing fundamental problems. Unfortunately, most studies on reduced speed limits do not consider most of the costs and rationalise away the ones they do attempt to quantify. Economic costs in particular are deliberately skewed. Only experience can show the disastrous effect of lowered speed limits on recreational motorcycling, but almost no road safety academics are motorcyclists and none are sports motorcyclists. As the research of Stephen Murphy shows high speed motorcycling can be an incredibly important part of the lives of those who do it. The loss of that cannot be fitted into simple models³. No academic expertise can fill this genuine gap in knowledge and understanding, and without it

Broken Academia

Australia is far too reliant on a small number of academic sources for policy, with there being little variety of opinions or debate. Dissenting views are often bullied out.

This leads to poorly executed studies being cited time after time for policy objectives. The most pertinent of these is the studies by CN Kloeden that are used to justify the claim that exceeding the speed limit by 5 km/h doubles the risk of crashing. This poorly constructed study with a wide uncertainty is very widely cited and has never had a replication attempt outside of the circle

In comparison, potentially inconvenient studies are never followed up. A University of Western Australia study showed that drivers in the most vulnerable group (young males)

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915731/vehicle-speed-compliance-statistics-2019.pdf

² http://www.20splentyforuk.org.uk/UsefulReports/SWOVReports/FS_Speed_choice.pdf

³ https://ulir.ul.ie/bitstream/handle/10344/5206/Murphy_2016_life.pdf?sequence=6 <https://journals.sagepub.com/doi/abs/10.1177/1470593118809792> <https://www.tandfonline.com/doi/abs/10.1080/0267257X.2011.627366>

saw their driving performance deteriorate dramatically when a low tolerance was used for speed limits in a simulator test. Taken into the real world it would show that 'speedo gazing' actually has a marked effect, which if incorporated into models would show a negative affect from the ultra-strict speed tolerances used in the country. In comparison, the UK uses 10% and achieves better results.

This academic consensus for ultra-strict speed enforcement is uniquely Australian and is both a cause and a consequence of too great a reliance on a small number of academic groups, MUARC in particular, who consistently produce reports telling state government advocates of harsh speeding enforcement what they want to hear.

The problem of myside bias is ever prevalent. This is the tendency to interpret evidence to fit one's prior beliefs. As explained by psychologist Keith Stanovich, one of the main explorers of it, academics are particularly vulnerable to it. This is because they are more informed and have fewer other biases in the field, so they believe they are being neutral when they are not. In fact, myside bias is very rare in being invariant, not affected by any measures of cognitive intelligence. Everyone has it.

Many academics are clear activists, pushing a certain view on road safety. Therefore, it should be no surprise that the research they produce reflects their beliefs. Thus it is important to get a wide variety of opinion including non-expert opinion and give it genuine weight. This is never done.

There are some really absurd conclusion that can be produced due to the obsession with speed amongst the Australian academia, for example a 30% reduction in FSI crashes in Perth being attributed to a 0.1 km/h decrease in average speed, well within the range of error. Some research allows conclusions to be drawn that small decreases in speed could eliminate most deaths, something that is never seen anywhere. This misattribution tendency means that academics tend to downplay the influence of infrastructure, changes in vehicle safety and the effect of mobile phones allowing accident victims to be treated more promptly. Any lack of long-term safety improvement is treated not as a sign of speed enforcement being less effective than thought, but as a sign that there's not enough. The conclusions from the supposed effectiveness of enforcement, which consistently lie around a 30% reduction of FSI crashes, simply don't seem to spill into the real world outside of studies made by people predisposed to believing that it works. Truly independent assessments might get to the bottom of these discrepancies.

Broken Priorities

There is also the problem of how spending is prioritised. Country road spending has increasingly fallen behind even as vastly inflated amounts are spent on overwrought city projects. Of this pittance, too much is directed into the use of cable barriers. A report to the Victorian Auditor General showed that the claimed effectiveness is massively overstated. Great work might have been done had money been spent widening two-way country roads instead. It is notable that Australia is rushing into these as Europe is rushing out. The only exception is Sweden, and it's no surprise that this is the only European country ever discussed when they come up. Norway and the Netherlands have both removed all the cable barriers from their country roads at the behest of local motorcyclists' groups and

other countries are planning to follow. In any case their high maintenance costs do not justify the economically, even with their initial cheap price.

Of particular concern is the implementation of the new MASH standard for cable barriers. These are taller, have more evenly spaced wires and closer posts. They are likely to be even more dangerous for motorcyclists than the previous standard, but have never been tested for them.

Furthermore, the Vision Zero principles are not even applied consistently. While it is propounded that safety is foremost, when it comes to removing trees in the road corridor – proper clear zone maintenance being more effective than lower speed limits – all of a sudden, environmental concerns are paramount. Vision Zero seems to only apply to speed limit setting and not to other aspects of road maintenance. Of course, this shows that it is not really believed as a central principle.

Broken Governance

The governance systems behind speed limits in Australia are very broken. They are set entirely by academics and road authorities with some input from the police and local governments and no community consultation at all. They will take suggestions from people who want speed limits reduced (some reductions have come from a single complaint) but will never listen to community consensus in wanting one raised. These groups are of course already biased towards lower limits. The speed zoning guidelines have become increasingly biased towards lowering speed limits, effectively trying to lower the default rural limit by stealth. No technical assessment documents or minutes are available. The whole system lacks transparency and accountability.

As a matter of fact, the whole system is without democratic foundation and has been predominantly imposed by stealth, mainly by non-legislated rules changes. The entire 'Vision Zero' paradigm was never taken to an election other than in vague promises. Higher speed limits are regularly advocated for and are electorally popular. It is the job of politician to implement the will of the people. The fact that a group of very conservative academics who have values well out of step with the community should not be a barrier to this. If people want higher speed limits they should be allowed to have them regardless of what a group of experts – most of whom will have never driven the road in question – think. There is no place in a liberal society for an elite.

If people want to trade off safety for greater life satisfaction they should be allowed to regardless of what a small number of academics thinks. This is especially true of things such as recreational motorcycling. Suicides are the greatest cause of death of young Australians, at a rate more than three times that of motor vehicle accidents. Yet not only is a scant fraction of the resources dedicated, but society actively works against mental health by denying young Australians secure jobs with wage growth commensurate with historic levels and

Broken Training

There is one aspect that is conspicuously absent from the draft strategy, and that is training. Academia particularly in Australia has convinced policy makers that it is of no value. The

results speak for themselves, Australia is widely known to have some of the most incompetent drivers in the developed world.

It doesn't seem to occur to our academics or policy makers that part of the reason Europe and Japan have such good road safety records is that they have comprehensive and clearly defined training regimes. There are no parents teaching their kid to pass a test. Furthermore, the skills taught are more relevant.

Unfortunately, driver training in Australia is now decades behind that of Europe and it will be impossible to make up the difference for the current generation of drivers. This is entirely due to academic and institutional obstructionism.

Broken Licencing

Rather than training drivers like in Europe, Australia prefers to use onerous and lengthy restrictions and conditions. This is especially true of motorcycle licencing. Victoria and South Australia pose particularly long periods of power restrictions that are expressly not supported by evidence, even in literature misleadingly cited as supporting them. This distorts the small Australian market to the point that full powered versions of popular models are not even available. In comparison Europe has a much more age-stratified system with shorter periods overall, a direct access option and greater training. It gets much better results.

Positioning of the Individual

It is ironic that the strategy places the individual at the centre of the strategy when the individual has been expressly and systematically excluded in favour of special interest groups, especially academic think-tanks like MUARC and activist groups. As soon as anyone floats that opposes the Vision Zero ideology they are cut out of the picture completely. It is time for all views to be heard, not just ideologically acceptable ones.

This particularly applies to motorcyclists. Many road safety academics have expressed strong negative views of motorcycling. Yet when motorcyclists oppose their policy prescriptions, their 'expert' views carry the day. It is as if these academics know what motorcyclists need better than motorcyclists. This is patently absurd. No one should be bossed around by people who do not understand what they do no matter how many different statistical tables they have looked at. It violates simple human dignity. Furthermore, academics, road safety authorities and so on will always make the pretence of sympathising, but treat motorcyclists as a collective statistical group. Allowing them to ignore the very real individual cries to relax speed limits and allow them to enjoy themselves. The real individuals are substituted for a reified collective in order to justify the suppression of those individuals. This must stop.

The Way Forward

It is time for a complete overhaul of road safety in Australia, one making it much more community centred and placing user groups in control of their own destiny.

There is a need for open data and communications. All research used to drive road safety policy should be completely free and accessible, extending to the immediate reference within. Any research which falls outside this should be completely excluded.

Community engagement should be at the heart. The obscure groups with their concealed discussions should be eliminated. Instead, panels should be formed of user groups, drawn from known and named representatives. All discussions should have open minutes except where privacy or commercial prejudice is an issue. Most importantly, the greatest weight should be given to the opinions of those most affected by policy changes, not to an academic elite. Only by putting people in charge of their own destinies can a truly desirable outcome be obtained.

There should be a shift in priorities, with less spent on enforcement and more on education and training. Less should be spent on cable barriers and more on widening and clear zone maintenance.

Academics should have to demonstrate practical experience and understanding. No opinion on, say, motorcycling should be accepted unless they can demonstrate they are an active motorcyclist, for example.

Lastly it is time to remove ideological underpinnings. Autonomous vehicle experts do not believe that even full autonomy will eliminate deaths on roads. Near autonomy hasn't done it for rail. The Vision Zero idea that 'mobility is a function of safety' is pure nonsense that doesn't stand up to critical scrutiny. It is like saying that the enjoyment of batting in cricket is derived from the effects of the protective gear making a hit from the ball hurt less, and not from scoring runs. They exist together but are independent. It is time to seriously consider the costs of such a strategy, including the intangible costs. If people don't want a policy it shouldn't be implemented even if not doing so would break Vision Zero. If people want higher speed limits they should have them. It is time to put people first.