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WalkSydney is pleased to make a submission on the Consultation Draft [National Road Safety Strategy 2021-30](#).

WalkSydney is a community group working to make it easier, safer, and more pleasant to walk in Sydney. With a growing population we need to ensure people can easily walk to public transport, local shops and services, and shared transport options. The National Road Safety Strategy 2021-2030 provides an opportunity to achieve those outcomes and support a Vision Zero for vulnerable road users, especially pedestrians.

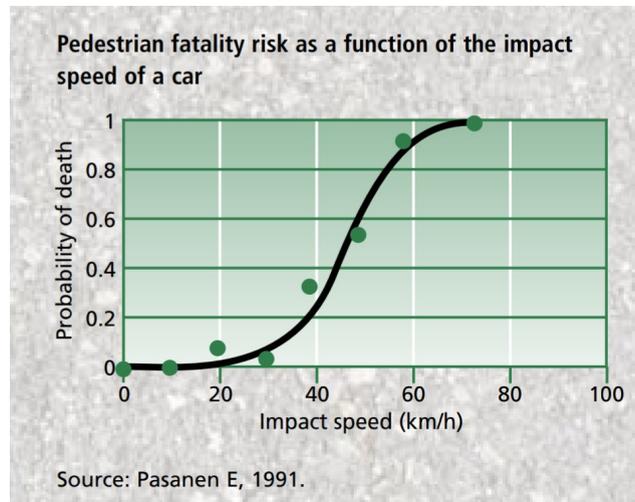
Summary

WalkSydney submits the following comments:

1. **Deploy 30 km/h safe street neighbourhood zones:** The strategy needs to be more explicit about how a 30 km/h speed limit in residential, school and certain commercial zones will significantly save lives and reduce serious injuries of all road users, consistent with the aim of the strategy, and devise strategy to make this speed limit reality.
2. **Prioritise vulnerable road users.** As almost all road users are classified as pedestrians at some point in their journey, the strategy should acknowledge the importance and significance of specific actions to improve the safety and situation of vulnerable road users in 2021-2030.
3. **Change the law / road rules to improve the safety of vulnerable road users.** The strategy does not address how safety for vulnerable road users should be better enforced / codified into the Road Rules. This is a significant omission.
4. **Stop victim blaming:** A road fatality and serious injury is most commonly the result of a collision with a vehicle. Blaming the victim such as a pedestrian for an injury caused by a vehicle driver excuses the driver from being responsible for the operation of the vehicle. Road rules should codify that the responsibility for road use rises with capacity to cause harm.
5. **Integrate with infrastructure funding strategies:** Provision should be made in the infrastructure and road spend for specific routes for pedestrians that are separated and protected from potential vehicle conflict.
6. **Plan for new technologies.** A 10 year strategy must look towards upcoming technology, to anticipate, allow, and account for the differences in road safety of our future road configuration.

1. Deploy 30 km/h safe street neighbourhood zones

As stated in the [Vulnerable road users fact sheet](#), it is estimated there is a 10% probability of being killed if struck at 30 km/h, but this rises to over 90% at 50 km/h.



[Road Safety - Speed Fact Sheet](#)
([World Health Organisation - Road Traffic Injuries](#))

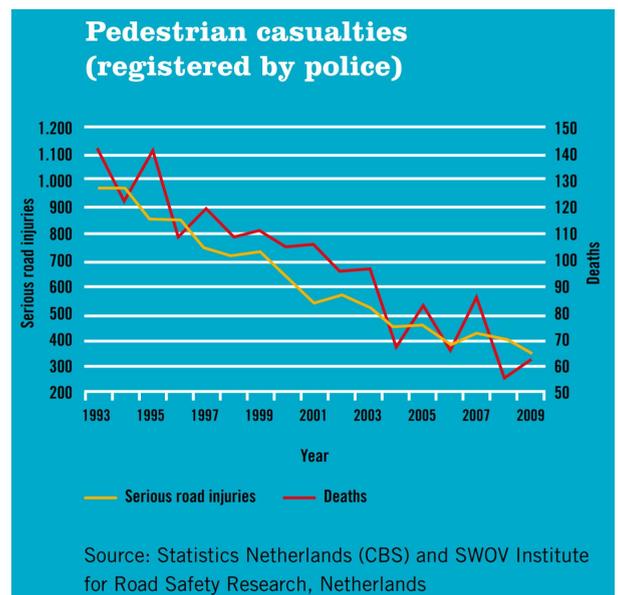
Despite this significant increased risk of death between 30-50 km/h, this strategy lacks specific actions around implementation of 30 km/h best practice - a speed limit still not used regularly or consistently across Australia. While the strategy identifies that speed management is critical for increasing the safety of all road users, it does not recommend what speed management policy could mean, where and how it could apply and therefore does not demonstrate how the needs of road users outside a vehicle will be addressed.

WalkSydney calls for stronger focus and explicit actions to support and implement lower speed zones to support vulnerable road users.

The World Health Organisation provides The Netherlands as a Case Study, successfully demonstrating the results of strong road safety strategies including:

- Road design - Construction of 30 km/h zones with raised, visible, uniform crossings
- Vehicle measures - Pedestrian-friendly car fronts
- Information and education on behavioural measures - drinking and driving, speeding.

Image: [Road safety - Basic Facts](#)
([World Health Organisation - Road Traffic Injuries](#))



According to Austroads, the most effective strategy to increase pedestrian safety to date is the adoption of lower urban speed limits. The Road Safety strategy could support the lowering of speed limits in shared areas, neighbourhoods or where there are high numbers of vulnerable users, such as school zones, as a strong



cost effective way to provide a safer environment for vulnerable road users. School zones in NSW are 40 km/h which is 50% higher risk of death than 30 km/h should there be a collision. Lower speed limits requires less expenditure on infrastructure (and more globally modern cost-effective methods of doing so could be utilised in Australia). In the recent [What Australia Wants: Living locally in walkable neighbourhoods study](#), the Heart Foundation found that the majority of Australians support lower speed limits in neighbourhoods.

2. Prioritise vulnerable road users

The fact sheet identifies that of the 1,195 people killed in road crashes in 2019, 34% were vulnerable road users. 160 (13%) were pedestrians.

These fatality statistics are significantly larger than the participation rates - see for example the [2016 census](#) shows vulnerable road users made up only 16% of trips to work (3.9% were pedestrian only), and vastly larger than the km traveled.

Data from the 2016 Census is now available on the ABS website, www.abs.gov.au/census

METHOD OF TRAVEL TO WORK

Method of travel to work	2016	2016 (%)	2011	2011 (%)
Car, as driver	6,574,571	68.7%	6,059,971	68.2%
Car, as passenger	489,922	5.1%	537,637	6.1%
Motorbike/scooter	64,580	0.7%	64,342	0.7%
Truck	85,892	0.9%	104,746	1.2%
Taxi	19,725	0.2%	22,076	0.2%
Train	488,012	5.1%	388,012	4.4%
Bus	323,201	3.4%	301,187	3.4%
Tram	58,736	0.6%	46,500	0.5%
Ferry	11,858	0.1%	10,889	0.1%
Bicycle	107,756	1.1%	103,913	1.2%
Other	73,512	0.8%	66,616	0.7%
Multiple methods	404,220	4.2%	356,634	4.0%
Walked only	370,427	3.9%	377,043	4.2%
Worked at home	503,582	5.3%	443,941	5.0%

* Excludes "Not stated" and "Did not go to work"

While fatalities of road users within a vehicle could be reduced due to safer and larger vehicles and better roads (motor ways, divided roads and freeways), there is little strategy targeting road users not in a vehicle (except for minimal proposals to provide separated bike lanes for gig economy workers and to strengthen graduated licensing arrangements for motor cyclists). Further, the larger vehicles (light trucks, utes) now becoming standard make the risk of injury and death for pedestrians higher, due both to greater mass at impact, and reduced visibility immediately in front of the vehicle.

The images in the strategy support the notion that the strategy is targeted towards vehicle use ie safe roads, safe vehicles, and safe road use (by wearing a seat belt) but is minimal about actions which would



tangibly improve the experience of the vulnerable road users, that is, road users who are likely victims of others' vehicle use.

Almost all road users are classified as pedestrians at some point in their journey, and therefore **the strategy should acknowledge the importance of planning around pedestrian safety.**

3. Change the law / road rules to improve the safety of vulnerable road users

The strategy does not address how safety for vulnerable road users will be enforced or codified. This is a significant omission. Each States' road rules are based on National model rules developed by the National Transport Commission.

A strong example of codifying safe road use has been the UK's proposed changes to The Highway Code to improve safety for vulnerable road users. The main alterations to the code proposed were:

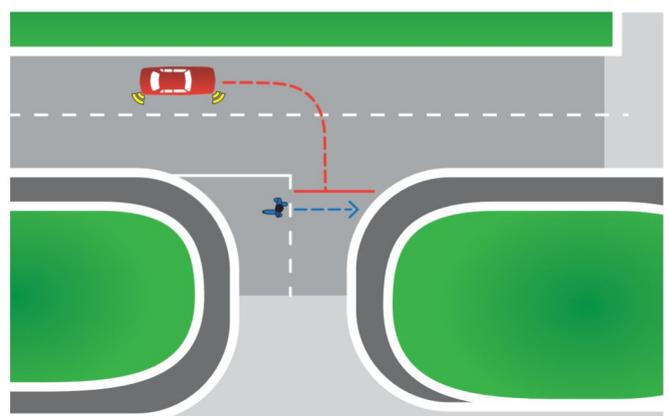
- introducing a **hierarchy of road users** which ensures that those road users who can do the greatest harm have the greatest responsibility to reduce the danger or threat they may pose to others
- clarifying existing rules on pedestrian priority on pavements, to advise that drivers and riders should **give way to pedestrians** crossing or waiting to cross the road at every intersection,
- providing guidance on cyclist priority at junctions to advise **drivers to give priority to cyclists** at junctions when travelling straight ahead
- establishing **guidance on safe passing distances and speeds when overtaking** cyclists and horse riders

More information about The Highway Code and walking can be viewed at [Living Street's Highway Code campaign page](#).

Clarifying where pedestrians have right of way would significantly help improve behaviour around one of the [Top 10 Misunderstood Road Rules](#) in NSW.

A hierarchy of road users would be particularly helpful where a decision needs to be made – for instance, can a pedestrian continue to cross a road where a vehicle is turning into or out of the road? Currently the 'give way' rules are dealt with in a complex way and the decision making process is unclear to road users. (See also Part 7 Giving Way in the [Australian Road Rules](#))

2 Giving way to pedestrians when turning





We refer to [WalkSydney's submission to the NTC on Review of NSW Road Rules 2014](#).

As part of this strategy, we urge that the Office of Road Safety coordinate with the National Transport Commission to review the Australian Road Rules alongside any Road Safety initiatives.

4. Stop victim blaming

A road fatality and serious injury is most commonly the result of a collision with a vehicle. Blaming the victim such as a pedestrian for an injury caused by a vehicle driver excuses the driver from being responsible for the operation of the vehicle. Often the victims are unable to defend themselves. Road rules should codify that the responsibility for road use rises with capacity to cause harm.

Victim blaming is at its worst for pedestrians, often supported flawed crash data and victim-directed advice. ([Policies and Interventions to Provide Safety for Pedestrians and Overcome the Systematic Biases Underlying the Failures. 2020](#)). This study outlines the tendency to victim blame is exacerbated for pedestrians by:

1. Difficulty determining fault in pedestrian crashes when the pedestrian is likely dead or injured and the driver is unlikely to admit fault.
2. Once the pedestrian is seen as mostly at fault, there is a tendency to jump to fix the pedestrians as a solution which drives advocacy for what pedestrians should do as the primary solution. Policies often focus on what pedestrians can do, but do not address how to advocate for systemic change, safe pedestrian amenities, or lower speed limits.

There needs to be increased focus on systemic change, safe amenities, and lower speed limits, over individual actions.

5. Integrate with infrastructure funding strategies

Alongside the road safety strategy, there must be provision for support and funding around planning and implementation of infrastructure and road-spend for specific routes and significant places for pedestrians, to ensure separation and protection from potential vehicle conflict.

Specific examples of road treatments which assist pedestrians are included in our [WalkSydney - Our Asks](#), relevant initiatives highlighted below:

Intersection crossings

- Increased use of wombats (raised pedestrian crossings, especially at intersections).
- Decreased use of beg buttons (pedestrian actuation) with pedestrian phases as the default condition.
- Increased use of all pedestrian phases, allowing pedestrians diagonal movements at intersections.
- Increased use of pedestrian detection technology at signals.



Infrastructure

- Provision of active transport connections to destinations, existing local infrastructure, and known walking/riding routes on all major projects.
- Reclassify roads to implement Movement and Place Framework.
- Fund public domain works around schools to overturn the widespread practice of drive-to-school.
- Fund network of protected bicycle lanes (not shared paths).
- Fund specific safety works such as widened and sharpened corners at local intersections to minimise the distance where pedestrians are vulnerable at crossing points and reduce the danger to pedestrians from turning vehicular traffic by forcing lowered speeds at sharpened and narrowed carriageway corners.

Instruct

- Train local government traffic engineers and road safety officers on road designs to provide walkability.
- Train TfNSW (RMS) traffic signals team about access by walking and bicycling
- Train NSW Police on the NSW Road Rules as they apply to pedestrian access
- Enforce (in a continuous and highly visible way) the road rules (such as left-turn rule, etc).

Implement Best Practices

Regularly review and revise

- Technical Directions
- Traffic Signal Design Guides
- Australian Standards and Austroads guides, including warrants.
- Speed zones to ensure lower speeds can be implemented easily in the right locations. A 30 km/h speed limit should be the default in urban areas, and higher only in select locations.
- Road Rules so that every intersection is by default a crosswalk, (i.e. the road crosses the footpath, rather than the footpath crossing the road), so it is clear to drivers that pedestrians have the right-of-way at unsignalised crossings.

6. Plan for new technologies.

A 10 year strategy must look towards upcoming transport technology, to anticipate, allow, and account for the differences in road safety of our future road configuration.

This includes community uptake of newer forms of transport (electric vehicles, micromobility), as well as on-vehicle safety technology.

For example, the [2021 European Mobility Atlas](#) provided a host of fact-based recommendations from sector experts supporting 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 mandatory for new cars. Australia should take the opportunity to align their new car regulations with these standards that protect the most vulnerable road users.

Establishing partnerships with industry players to encourage the use of telematics (driving feedback from an app and real-time LED light ray) especially for young drivers and fleet drivers could lead to higher



compliance with speed limits in general and be beneficial when rolling out lower speed limits. ([Young Drivers Telematics Trial \(YDTT\) 2018](#))

As part of this strategy, we urge that the Office of Road Safety coordinate with the National Transport Commission to plan towards future transport technologies.

Conclusion

WalkSydney supports the draft National Road Safety Strategy, however we raise important points that the strategy needs to be more effective and demonstrate how it will reduce road fatalities of vulnerable road users, especially pedestrians.

The strategy would improve safety if it included:

1. Deploy 30 km/h safe street neighbourhood zones
2. Prioritise vulnerable road users
3. Change the law / road rules to improve safety of vulnerable road users
4. Stop victim blaming
5. Integrate with infrastructure funding strategies
6. Plan for new technologies.

Thank you for taking the time to read our feedback.

Yours sincerely,
WalkSydney