

23rd March 2021

National Road Safety Strategy 2021-30 Draft

Thank you for considering my submission. I am on maternity leave with a toddler and a baby, so this submission will not be as long or as detailed as I would like it to be.

Recommendations:

1. Include deaths due to poor air quality from petrol and diesel use in the national road toll. **Air pollution caused 1715 deaths in 2015.**
2. Ban advertising for petrol and diesel cars.
3. Walking and cycling should be first in the modal hierarchy. These should be prioritised over all other forms of transport.
4. Public (electrified) transport should be next.
5. Private vehicles should be electrified as soon as possible.
6. Neighbourhood zones should have a 30 km/h speed limit.
7. Allocate twenty percent of transport funding to walking and cycling in line with United Nations recommendations.
8. Reconsider allowing large SUVs and utility vehicles to be sold in Australia.

Air Pollution

The draft document does not include deaths due to poor air quality from the combustion of petrol and diesel. These are greater than the current national road toll. Until the fleet is made up of 100% zero emission vehicles, we will continue to emit carbon monoxide, particulate matter, sulphurous dioxides, nitrous dioxides and more (zero emission vehicles with conventional wheels will also emit particulate matter as the wheels break down). Internal combustion engines are expensive – relying on them means less fuel security, more air pollution, and more noise pollution in our streets.

The Electric Vehicle Council and Asthma Australia report found that emissions from internal combustion engine vehicles in the Sydney-Newcastle-Wollongong area create \$3 billion in health costs a year and unborn babies, children and the elderly are worst affected. It said widespread adoption of electric vehicles, which do not produce exhaust emissions, would markedly improve air quality as well as cutting noise and greenhouse gas pollution.

Official data estimates that air pollution from vehicle emissions caused the deaths of 1,715 Australians in 2015.¹

¹ <https://www.smh.com.au/politics/federal/road-death-toll-should-include-victims-of-vehicle-emissions-report-20190628-p522a8.html>

(This figure) is likely conservative.²

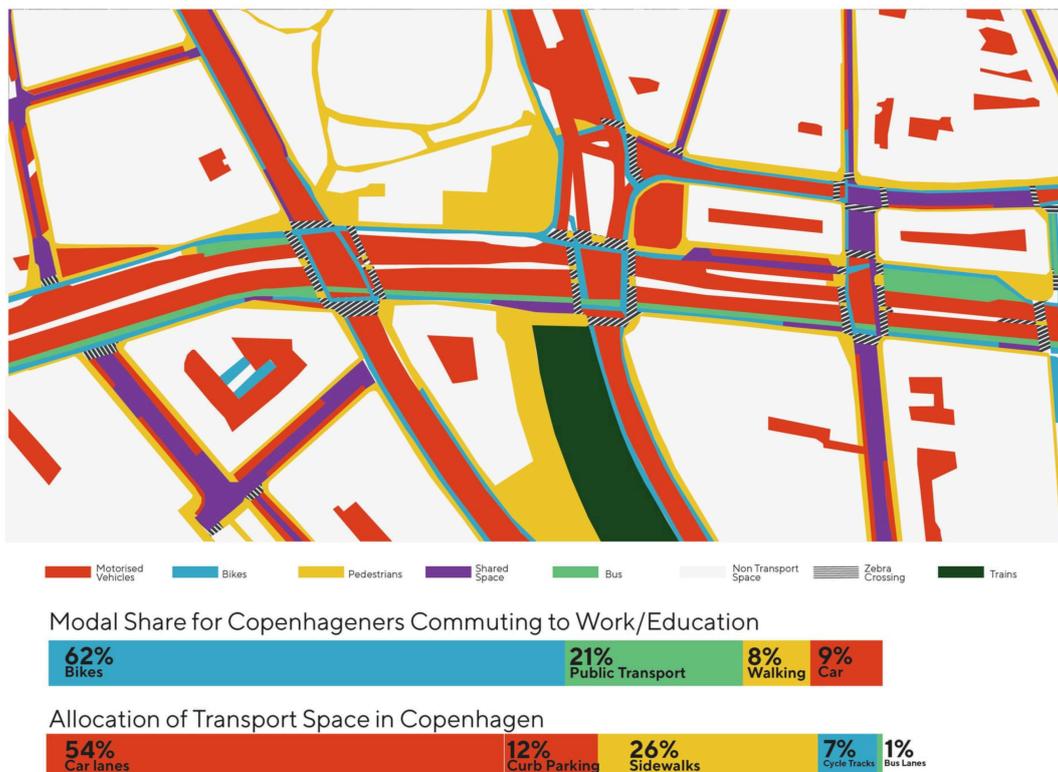
Air pollution must be addressed as a matter of urgency.³

We banned tobacco advertising because of the harm to human health. It is time to consider banning advertising for all petrol and diesel cars as well.⁴ Much more needs to be done to clean our air.

Walking and Cycling

Walking and cycling are much better for people and society than driving – a recent study from Europe calculated “each kilometre driven by car incurs an **external cost** of €0.11, while cycling and walking represent **benefits** of €0.18 and €0.37 per kilometre”⁵ (emphasis added). Electric bicycles have just entered the market and, with the right support, could remove a lot of demand for private vehicles, as has happened in other parts of the world. Cycling is also much more spatially efficient, as shown in the image below, which compares modal share and allocation of transport space in Copenhagen⁶.

These recent Transport for NSW policies should be adopted by all other State transport agencies: “Every transport project funded by Transport for NSW must include provision for walking and cycling” and “Provision for walking and cycling must be delivered from the outset of every transport project”.



² <https://www.smh.com.au/national/the-other-deadlier-road-toll-car-pollution-20190128-p50u2h.html>

³ <https://reneweconomy.com.au/the-other-road-toll-we-can-no-longer-ignore-38486/>

⁴ <https://www.badverts.org>

⁵ <https://www.sciencedirect.com/science/article/abs/pii/S0921800918308097>

⁶ <https://www.theguardian.com/cities/gallery/2018/jun/11/copenhagenize-case-urban-cycling-graphs>

Intra-regional and last- and first- mile freight can be delivered cheaply and efficiently using electric cargo bicycles. In Central London, there is a cycling logistics company called Pedal Me that uses these to carry people, fridges, and move entire apartments! They have produced an analysis detailing just how much more time efficient (let alone energy efficient) their logistical movements are when compared with a conventional company – the bicycles were able to move 3.5 km/h faster than vans on average. More details can be found on their website⁷. The image below shows the contents of a house being moved on an electric cargo bicycle with trailer⁸.



30 km/h limits for local neighbourhoods would be a welcome intervention. A pedestrian struck at 30 km/h has only a 10% probability of dying, whereas a person struck by a car at 50 km/h has a 90% probability of dying, as noted in the draft report. Why isn't there a more concrete target to lower speeds rather than "frameworks to support best practice speed management and tailored safe system road treatments"?

This could be made even more effective by also implementing local school streets and low traffic neighbourhoods. The school streets initiative from the UK closes the roads around schools off to motor traffic during school drop-offs and pick-ups, encouraging students and parents to walk and cycle to school⁹. Apart from the direct health benefits of increased walking and cycling, reducing motor traffic lead to better local air quality¹⁰.

⁷ <https://pedalme.co.uk/why-cargo-bikes/>

⁸ <https://www.instagram.com/p/CDmX6BYlzQm/>

⁹ <https://playingout.net/school-streets-the-movement-for-childrens-freedom-grows/> (Image from this site)

¹⁰ <http://schoolstreets.org.uk>



Low traffic neighbourhoods within London have also been very popular and have lowered the proportion of trips taken by private vehicle. By filtering non-local traffic, the local streets are safe to use for cycling and walking^{11,12}. The use of GPS apps has vastly increased the number of non-local trips in these areas¹³.



Hospital trusts in London are sponsoring low traffic neighbourhoods because of the fantastic long-term health benefits of these schemes¹⁴.

11

https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/60003fabf3791928a02b707f/1610629036655/LTN+Briefing_FINAL.pdf

¹² <https://twitter.com/MakeLeeGreen/status/1281272258435178497/photo/1> (Image from this site)

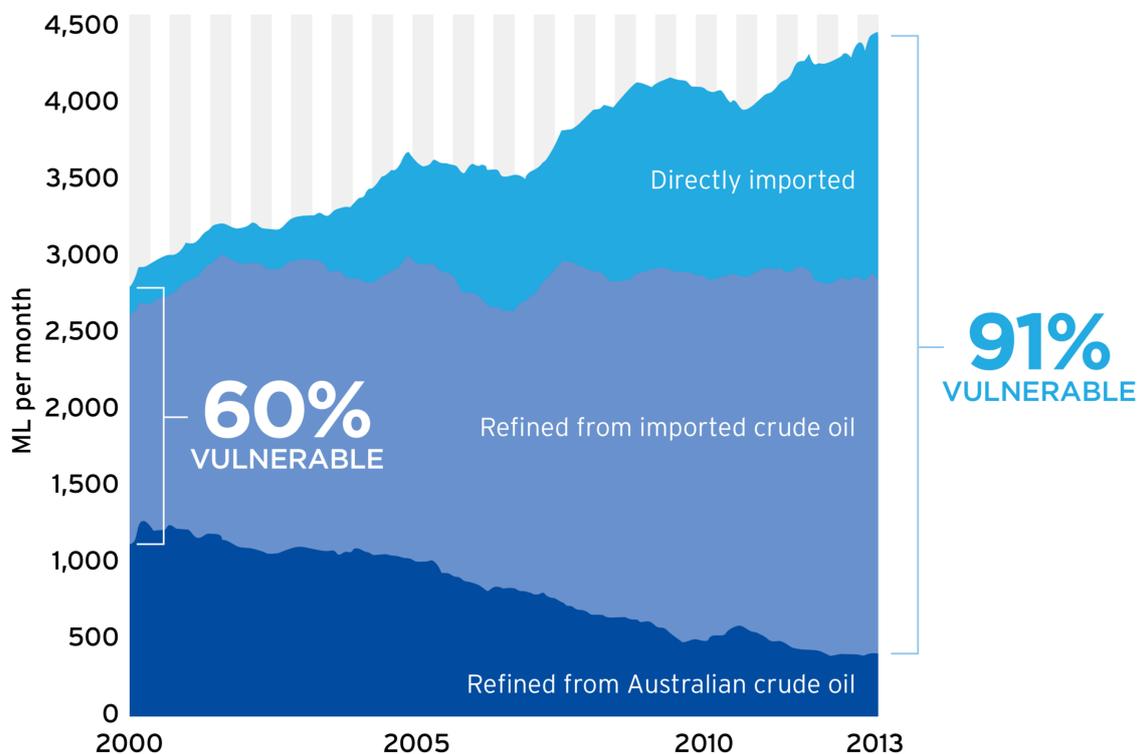
¹³ <https://www.sustrans.org.uk/for-professionals/infrastructure/an-introductory-guide-to-low-traffic-neighbourhood-design/an-introductory-guide-to-low-traffic-neighbourhood-design-contents/>

¹⁴ <https://www.theguardian.com/environment/2020/nov/17/london-hospital-trust-to-pay-250k-to-install-ltn-for-public-health-benefits>

Separated cycle lanes make the road safer for all users. According to a study of 12 large metropolises that was published by researchers at the University of Colorado Denver and University of New Mexico in 2019, “protected bike lanes led to a drastic decline in fatalities for all users of the road”. A co-author told reporters: “If you’re going out of your way to make your city safe for a broader range of cyclists ... we’re finding that it ends up being a safer city for everyone.”^{15,16} However, it was “found that painted bike lanes provided no improvement on road safety. And their review earlier this year of shared roadways — where bike symbols are painted in the middle of a lane — revealed that it was actually safer to have no bike markings at all.”¹⁷

Removing car parking in favour of well-designed cycle lanes through town centres actually leads to increased footfall and patronage at local shops¹⁸, essentially because it is much easier to dismount from and park a bicycle than it is to park a car. The New York City Department of Transportation report available in the link at the footnote¹⁹ goes into more detail.

Increasing the proportion of trips that are made through active and electrified public transport also increases the resilience of the transport system, as domestically generated electricity can be used instead of imported liquid fuel products. Australia currently imports 90% of our total liquid fuel requirements. This figure is expected to reach 100% within the next decade.



Australia has been relying more and more on imported liquid fuel²⁰

¹⁵ <https://www.sciencedirect.com/science/article/abs/pii/S2214140518301488?via%3Dihub>

¹⁶ <https://usa.streetsblog.org/2019/05/29/protect-yourself-separated-bike-lanes-means-safer-streets-study-says/>

¹⁷ <https://www.sciencedirect.com/science/article/pii/S2046043018300583?via%3Dihub>

¹⁸ <http://www.cycling-embassy.dk/2013/08/26/are-cyclists-good-customers/>

¹⁹ <http://www.nyc.gov/html/dot/downloads/pdf/dot-economic-benefits-of-sustainable-streets.pdf>

²⁰ https://www.aie.org.au/data/pdfs/oil_gas_articles/NRMA_Fuel_Security_Report_Pt2.pdf

UN recommendations for funding

The United Nations recommends that 20 percent of transport budgets be allocated to walking and cycling.²¹ In Australia the figure spent on cycling is consistently less than 1.5%.²²

Consider the size and need for some types of vehicles

Sport utility vehicles, and many utility vehicles, have very large front blind spots. Vehicles that are this size are not needed in the urban and suburban areas.

The driver in the video below can only see the tenth child!²³



Please do not hesitate to contact me to further discuss any of the points raised above.

Yours sincerely,

Anna Harvey

²¹ <https://europa.eu/capacity4dev/unep/documents/global-outlook-walking-and-cycling-policies-realities-around-world>

²² <https://theconversation.com/cycling-and-walking-are-short-changed-when-it-comes-to-transport-funding-in-australia-92574>

²³ <https://kmp.com/news/local/dangerous-blind-spots-in-trucks-and-suvs-cause-hundreds-of-child-deaths>