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NATIONAL ROAD SAFETY STRATEGY 2021-2030

RESPONSE TO DRAFT

MARCH 2021

Introduction

The [National Road Safety Strategy](#) (NRSS) 2021-2030 will set out Australia's approach to improve road safety outcomes in Australia, with the long-term vision of zero deaths and serious injuries on Australian roads by 2050. The Strategy, prepared by the [Office of Road Safety](#) (ORS), comprises three **themes** (Safe Roads, Safe Vehicles, Safe Road Use) and nine corresponding **priorities** that will form the basis of the ORS' ten-year strategy.

This document addresses several issues affecting the current NRSS draft particularly within the context of vulnerable road users (VRUs) and offers recommendations for improvement. Bicycle Network offers this feedback in the spirit of cooperation and in alignment with the Australian Government's long-term goal to eliminate road fatalities.

Major points of consideration

Acknowledge the interconnectedness between priorities

The Strategy acknowledges that boosting road safety cannot be achieved without “*an understanding of how different elements interact*” (page 13). The ‘social model’ schematic framework on page 13 depicts the relationship between the Strategy's three themes and nine priorities. However, the Strategy could be significantly enhanced if it were to better acknowledge the interconnectedness between its priorities.

For example, the [Australian Road Deaths Database](#) (ARDD) reveals a number of important factors that characterise fatal road crashes:

- In 2020 just under 90 per cent of bike rider fatalities involved another vehicle, a statistic that is consistent with the average for the last 20 years (82 per cent).
- Over the last 20 years approximately 1 in 4 bicycle fatalities involved a heavy vehicle (bus, overweight or articulated trucks).
- Over the last 20 years 60 per cent of the bike rider fatalities in regional areas occurred on roads with posted speed limits between 80-100km/h.

These data insights highlight a complex interrelationship between several of the priorities covered by the NRSS draft: ‘Vulnerable Road Users’, ‘Regional Road Safety’, ‘Heavy Vehicle Safety’, and possibly ‘Risky Road Use’. While it is practical to remove this level of complexity for the basis of a strategic framework, it is also problematic to treat the priorities in isolation. It is simply not enough to tackle VRUs issues, for example, without appropriate consideration of risky road use, infrastructure planning, and other key priority domains.

Bicycle Network therefore recommends that the Strategy offers more thorough acknowledgement of relationships amongst the NRSS priorities, and how these will be accommodated across the Strategy timeline. This can be as simple as modifying the schematic framework (page 13) so that relationships amongst the nine priorities are more appropriately annotated; or may include more rigorous expansion of the guiding principles (page 10–11) and enabling actions (page 19) to better detail how the ORS will treat the dynamic and often complex nature of road safety.

Expand the strategic actions for vulnerable road users (VRU)

The ‘Vulnerable Road Users’ priority (page 18) sets out the strategy for this cohort and provides four key actions. As currently written, the listed actions place emphasis on VRU

behaviours (e.g. protective apparel, adherence to speed and drug/alcohol legislation), rather than how the road environment can be changed to support their physical vulnerability. In short, the action points in this section paint a picture that VRUs are responsible for their own safety on our roads.

Moreover, the representation of VRU types in this priority are disproportionate. Three of the four actions listed under this priority are of predominant relevance to motorbike riders, which represent only a third of the total VRU cohort. There is no consideration of how pedestrian safety fits into the Strategy, or the most appropriate safety provisions for bike riders (e.g. separated infrastructure).

The ‘Vulnerable Road Users’ priority aims to “*provide safe access for all road users*”. Therefore, Bicycle Network recommends that the action points listed under this priority be carefully re-examined with an increased focus on:

- increased protection of pedestrians and bike riders;
- behavioural issues in other road users that directly affect VRUs (e.g. compliance with minimum passing distance laws); and
- changes to the physical environment.

Ensure appropriate consideration of separated infrastructure for vulnerable road users

The ‘Infrastructure Planning and Investment’ priority (page 15) addresses the need for designing a safe system that is future-focused and takes into account the physical vulnerability of all road users. A wealth of literature suggests that separated infrastructure is an effective safety measure for bike riders and is therefore of exceptional benefit. However, the current draft does not offer appropriate recognition of separated infrastructure and its associated benefits.

A brief ‘throwaway’ example is offered within the context of the ‘Workplace Road Safety’ priority (page 17), but there is no mention of separated infrastructure under the ‘Vulnerable Road Users’ priority (page 18), where it is arguably more relevant.

Bicycle Network recommends that separated infrastructure be prioritised for the Strategy, within the context of either the ‘Infrastructure Planning and Investment’ or ‘Vulnerable Road Users’ priorities. Federal and state investments into active travel are increasing. To ensure a future-focused safe system, the NRSS should recognise the role of separated infrastructure in protecting a growing active travel population.

Consideration for behaviour change campaigns to support heavy vehicle safety

The ‘Heavy Vehicle Safety’ priority summary (page 16) sets out the key actions for minimizing road crashes involving a heavy vehicle. The actions listed in the current draft primarily involve the roll-out of safety technologies and legislation adjustments. Educational interventions that can drive effective behaviour changes in heavy vehicle drivers and other road users will be equally important, and there is an opportunity for the ORS to include this in the Strategy.

Bicycle Network recommends that educational interventions be considered as an additional action under the ‘Heavy Vehicle Safety’ priority. This will ensure that there will be an increased community understanding regarding the limitations that all road users face when it comes to visibility, behaviour, perspective and vulnerability around heavy vehicles.

Minor points of consideration

Recognise that fatalities for different road users are disproportionate

A schematic summary on page 5 shows that Australia was 9 per cent ahead of its set targets for curbing road fatality reductions during the 2011-2020 period.

In this forthcoming strategy, there is still an opportunity to reconsider how these targets are set out. Fatality reductions remain disproportionate amongst different road users. Data from the ARDD reveals that the annual reduction in vehicle-based deaths per capita is substantially higher than it is for bikes. In fact, over the last 20 years, there has been no net growth or decline in the number of bike rider fatalities, which suggests that our current safety measures are inefficient for protecting this group. It is thus impractical to consider metrics for the total road user population.

Bicycle Network strongly urges the ORS to consider setting individual targets for different road user types and to monitor future data accordingly. This will ensure that the delivery of positive safety outcomes for different road users occurs in equal measure.

Accessibility of the National Data Hub

In numerous sections, the Strategy refers to a National Data Hub, where progress on implementation and performance indicators will be periodically published. It is unclear whether this data hub will be an open data resource available to the public for individual inquiries. We recommend that this is made clearer for readers, so that the transparency and accountability principles defined in the document can be properly understood and acknowledged.

Clarity of the social model

The 'social model' schematic diagram (page 13) outlines the themes and priorities that comprise the NRSS. The diagram is particularly effective for laying out these components. However, it is not particularly clear what the green and blue connectors are conveying. We recommend the inclusion of a legend or additional text that explains to the reader how these connections are to be interpreted. We also reiterate here that the diagram could potentially be enhanced to show the interconnectedness between different priorities, and to better illustrate the complex nature of road safety.

Validity of the Wramborg model

We note that a probability model by Wramborg (2005; page 14) is cited in numerous parts of the draft without an appropriate bibliographic reference. Moreover, the publication in question (reference below) is a conference proceeding, rather than a peer-reviewed publication. While the data shown in 'Wramborg's model' are nonetheless compelling, there is little information regarding the level of critical appraisal the work has undergone, which may cast some doubt on its scientific rigor. It is therefore recommended that a study that has undergone appropriate peer-review is considered to inform the Strategy.

Wramborg, P. (2005) A new approach to a safe and sustainable road structure and street design for urban areas. Proceedings of the Road Safety on Four Continents Conference, Warsaw, Poland.

Who we are

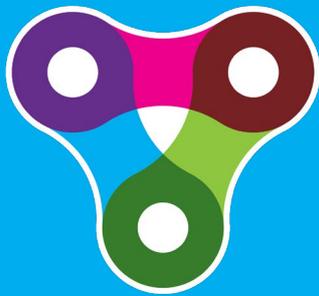
With nearly 50,000 members, [Bicycle Network](#) is one of the top five member-based bike riding organisations in the world. We are committed to improving the health and wellbeing of all Australians by making it easier for people to ride a bike.

Operating nationally, we have a measurable, successful and large-scale impact in community participation and the promotion of healthy lifestyles through bike riding.

We achieve this through:

- improving the bike riding environment by working with government at all levels to provide better infrastructure, legislation, data, policies and regulations;
- delivering successful, large-scale behaviour change programs such as Ride2School and Ride2Work;
- providing services and insurance that support bike riders through nationwide membership;
- running mass participation bike riding events such as the Great Vic Bike Ride; and
- being a key national spokesperson on issues related to cycling and physical activity.

This submission was prepared by Dr Nicholas Hunter, Public Affairs Advisor for Bicycle Network.



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