Speed Management Strategy Consultation

RACT feedback

November 2024

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The Royal Automobile Club of Tasmania

More than 215,000 Tasmanians are Royal Automobile Club of Tasmania (RACT) members. We are the largest and strongest member organisation in Tasmania and an award-winning Tasmanian owned insurance company.

Established in 1923, RACT is an apolitical and independent transport infrastructure, road safety and mobility advocate. We are committed to supporting and furthering the interests of Tasmanians and we do this through a comprehensive program of consultation, education, awareness and public advocacy.

RACT is represented by senior staff in a number of stakeholder reference organisations in Tasmania including the Road Safety Advisory Council.

Nationally, RACT is a constituent member of the Australian Automobile Association (AAA), which represents some eight million Australians, and is represented on the board of the Insurance Council of Australia (ICA).

RACT is a regular contributor to the committees and forums of the AAA and the ICA.

Internationally, RACT has joined with other Australian motoring organisations as a member of the Fédération Internationale de l'Automobile (FIA) to work on road safety and related issues at a global level.

RACT's advocacy and public policy activity is defined by a series of policy documents developed and endorsed by the RACT Board. This includes our Safe Speed Policy which was updated in July 2023 and is a basis for this submission.

The Safe Speed Policy, and our other policies, have been informed by history, experience, research, statistical analysis, consultation, industry knowledge and most importantly, through regular engagement with our member community.

Introduction

RACT is deeply committed to reducing road deaths and serious injuries so that every Tasmania arrives safely. Tasmania consistently has the second highest rate of fatalities and serious injuries per capita of any state in Australia, we can and must do better Any loss of life or severe injury on our roads is unacceptable, and urgent action is required to address this critical issue.

Safer Journey is a key purpose area for RACT. Within this focus area, our goal is to continuously improve the safety of Tasmania's roads, including the implementation of appropriate speed policies to support safer outcomes.

We strongly support the Government's initiative to develop a Speed Management Strategy and extend our gratitude to the Department of State Growth for the opportunity to contribute to its development.

A substantial body of evidence from Tasmania, Australia, and around the world demonstrates that effective speed management delivers significant road safety benefits. These include fewer crashes, reduced injury severity, lower emissions, decreased noise pollution, wildlife protection, increased active transport, and the creation of more liveable cities.

For decades, we have advocated for improved speed management. We acknowledge the initiatives of the Tasmanian Government that have achieved tangible progress, such as the introduction of school speed zones in 2003 to protect children, the reduction of the urban default speed limit from 60 km/h to 50 km/h in 2002, and the establishment of an 80 km/h default speed limit for unsealed roads in 2012.

However, speed limits are not standalone solutions. They are intrinsically linked to other Safe System elements, including the quality of road infrastructure, vehicle safety features, and driver behaviour.

We firmly believe that upgrading road infrastructure to accommodate the volume and type of traffic it carries is critical for achieving effective speed management. Certain corridors must maintain higher travel speeds to ensure the efficient movement of people and goods. The Midland Highway is a prime example, where Safe System infrastructure supports high travel speeds on a key strategic route. This approach should be further expanded. Similarly, urban areas require infrastructure designed to support the lower travel speeds essential for safety and livability. Examples include Local Area Traffic Management, raised pedestrian crossings, and local roundabouts.

One major shortfall in Tasmania's ability to manage speeds effectively is the absence of a strategic transport planning framework that clearly classifies roads and streets according to their Movement and Place categories. Without such a framework, speed management efforts remain inconsistent and ad hoc.

RACT strongly advocates for evidence-based decision-making to guide the prioritisation of actions required to improve road safety. Conducting a comprehensive safety survey of Tasmania's roads is essential. A survey, such as AusRAP (or another nationally accepted infrastructure risk rating methodology), will provide valuable insights into current safety ratings, support community engagement, identify critical infrastructure improvement opportunities, and highlight key safety issues. Moreover, it will enable ongoing measurement of the impact of investments and other initiatives, ensuring sustained progress towards safer roads.

The lack of a cohesive approach has been a recurring theme in both the 2011 and 2022 Legislative Council Select Committee inquiries, which recommended that the government adopt a consistent and clear strategy for managing speed limits on state and local roads.

Another critical area requiring significant investment for improved speed management in Tasmania is the development of a consistent and structured process for community engagement including change management, communications, and co-design with Tasmanians.

Many successful public health campaigns have gained greater traction than speed management—not due to stronger evidence of risk but because of effective engagement. Examples include anti-smoking initiatives, HIV/AIDS awareness and prevention, skin cancer campaigns, and, within road safety, campaigns against drink driving and promoting seat belt use where social attitudes and change has resulted.

Exploring new opportunities and innovative approaches to effectively engage with Tasmania's communities will be crucial. Meaningful consultation, focused on collaborative solution-finding, is essential for developing outcomes that support both individual and collective actions.

These areas provide valuable lessons on how to engage with the community and shift public mindsets. While the science and evidence supporting speed management are clear, they alone are not sufficient—we must bring the community along on the journey.

Responses to the Consultation Questions

The following sections respond directly to the questions outlined in the Speed Management Strategy Consultation Paper (September 2024).

Consultation Question 1: What are your thoughts or comments on the aim of the Strategy?

The Government's Speed Management Strategy Consultation Paper states:

> *"The aim of the Speed Management Strategy is to help reduce the number of people seriously injured or killed by supporting safe and appropriate vehicle travel speeds on Tasmanian roads.*
>
> *These are speeds that are matched to the safety capacity of our roads and our human tolerances for crash forces. The Safe System approach places the safety of road users at the centre of speed management and is the first priority. At the same time, the Strategy will also recognise that the efficient movement of people and goods is an important priority – this is the goal of safe mobility.*
>
> *The Strategy will also aim to achieve the wider benefits from effective speed management. This includes reduced traffic congestion, increased fuel efficiency, improved health and wellbeing, and reduced pollution and CO2 emissions.*
>
> *At the same time, it is recognised that speed management is only one part of Tasmania's road safety effort. To significantly reduce serious casualties, it requires the whole range of measures that are being delivered under Tasmania's Towards Zero Action Plan 2020-2024."*

RACT's response:

- The Strategy's aim aligns with global best practices, recognising that speed management extends beyond road safety to influence broader societal outcomes.
- We fully support the principle of aligning speed limits with the risk level of roads. As outlined in our Safe Speed Policy: "Safe speeds involve reconsidering speed limits to reflect road quality and its surroundings."
- While the current draft of the Strategy reflects this principle, we believe it requires a stronger emphasis on upgrading infrastructure along key strategic corridors. This would not only enhance safety but also build community confidence in the broader speed management process.
- Investment in benchmarking the current state of infrastructure, supporting infrastructure upgrades, integrating technology, fostering community engagement through two-way communication, and delivering targeted campaigns is essential. This is particularly critical where vehicle speeds are unlikely to align with safety standards without additional interventions.
- We agree that speed management is only one component of the Safe System approach required to achieve significant road safety benefits. However, speed management serves as the regulator of safety within the system. It compensates for gaps in other system elements, ensuring that overall road safety outcomes are achieved. This critical role should be further highlighted within this action area.

Consultation question 2: Are these principles right or are there other best-practice principles that we should consider in our approach to this Strategy?

The Government's Speed Management Strategy Consultation Paper states:

> *Strategy principles*
>
> - *People are at the centre of speed management and our priority is to keep Tasmanians and visitors safe on the road network*
> - *Speed limits are set in a way that is clear, easily understood and takes a whole network approach to safe mobility using a Movement and Place framework*
> - *Speed management is a holistic approach to improving the safety of the Tasmanian road network*
> - *Vehicle speeds are managed to prioritise the health and wellbeing of the community, enabling safe, accessible active transport options, improved public health, and environmental and economic co-benefits*
> - *Speed management is a shared responsibility between road managers and road authorities, road users and the whole community*

RACT's response:

The principles outlined in the Strategy align closely with RACT's policy positions and reflect both national and international best practices.

Areas for enhancement:

- We agree that people should be at the centre of speed management. However, the current principle focuses solely on the outcome (keeping people safe). We recommend acknowledging the active role of people in shaping safe speeds, which aligns with our previous comments on the importance of a structured plan for change management, communication, and community engagement.
- The concept of 'shared responsibility' in road transport can present challenges, particularly for road managers who may use it as a justification to avoid addressing systemic risks. This can unfairly shift blame onto road users for errors in inherently unsafe environments. While we do not believe this is the Strategy's intent, it would be strengthened by clearly defining the accountability of road managers in addressing these systemic risks.

Consultation Question 3: What is your view about road and roadside infrastructure that supports safe vehicle speeds?

The Government's Speed Management Strategy Consultation Paper states:

> *The Strategy will ensure that infrastructure design, delivery and maintenance have a strengthened speed management focus. This includes understanding the use of the road, improving identification and management of road safety risks and supporting safe vehicle speeds. It also means identifying opportunities to upgrade infrastructure to support higher speeds where these are needed for the safe and efficient movement of goods.*
>
> *This action area will also include reference to programs and initiatives that support speed management approaches, such as the Vulnerable Road User Program and the Safer Rural Roads Programs.*
>
> *A focus will be on improving promotion of infrastructure projects that support safe speeds and reduce crash risks.*
>
> *Roadside infrastructure includes design measures and modifications located next to the road surface, such as guard rails, barriers and signage.*

RACT's response:

- This section aligns closely with RACT's long-standing policy positions, and we are encouraged by the focus on identifying risks and the commitment to upgrading infrastructure to support higher speeds on key strategic transport corridors.
- While the emphasis on improving rural roads is appropriate and well-placed, we also believe that targeted infrastructure enhancements in urban areas are equally important. Such improvements would support lower vehicle speeds in areas with high pedestrian and cyclist activity, significantly contributing to overall road safety.

Consultation question 4: What is your view about speed limits that reduce risk and align with the safety level of the road network?

The Government's Speed Management Strategy Consultation Paper states:

> *It is important that we identify opportunities to implement safer speed limits, particularly in areas to protect vulnerable road users, including children and cyclists. To support this, we aim to use a best practice Movement and Place framework.*
>
> *Another key area of focus is identifying mismatches between speed limits and the safety capacity of road and roadside infrastructure. This will ensure that speed limits are consistently assessed as being safe and appropriate for the nature, condition and use of roads. For the primary freight and passenger roads, including Tasmania's major highways, in the medium-term, speed limit reductions would only be considered when the mismatch between speed and infrastructure safety represents a substantial risk.*
>
> *Other priorities include strengthening collaboration with local government to support councils in identifying road safety risk and implementing speed management responses.*

RACT's response:

- We support this action area, provided there is a consistent application of speed limits across both state and local roads.
- RACT advocates for evidence-based decision-making to guide the prioritisation of actions. This requires conducting a road infrastructure risk rating survey, such as AusRAP. A comprehensive survey of the existing safety on our roads will facilitate community engagement, identify critical infrastructure improvement opportunities and key safety issues, and enable ongoing measurement of improvements resulting from investments or other actions.
- We welcome the commitment to a strategic planning framework like Movement and Place, as it is crucial for striking the right balance between speed limits and infrastructure, ensuring consistency across the network.
- The reference to 'substantial risk' as a trigger for speed limit reductions on primary freight and passenger routes requires further clarification. We believe such determinations should be based on a collective risk approach, supported by evidence-based road risk assessment methodologies and expert evaluations such as Road Safety Audits or Safe System Assessments.
- We strongly advocate for engaging local governments in this process. Being closely connected to their communities, they play a vital role in driving effective change management and fostering support for speed management initiatives.

Consultation question 5: What is your view about Enforcement of speed limits to encourage safe road user behaviour?

The Government's Speed Management Strategy Consultation Paper states:

> *Speed limit enforcement is critical to improving road safety. In Tasmania, automated enforcement, using mobile cameras, complements the ongoing manual speed limit enforcement efforts undertaken by Tasmania Police.*
>
> *A focus in this area includes ensuring that Tasmania's automated enforcement efforts are guided by best practice speed management, including the priority to reduce network crash risk. This means targeting higher risk locations, with the goal of reducing fatal and serious injury crashes.*
>
> *Actions will also focus on communicating the importance of speed limit enforcement, and the role played by automated enforcement programs in preventing serious casualty crashes.*

RACT's response:

- We support this action area, as it aligns with our policy position: "[RACT] urges the renewal and extension of the state's road safety camera network of fixed and mobile cameras, along with any technology that helps reduce deaths and serious injuries through deterrence, education, and enforcement."
- Enforcement plays a critical role in both specific and general deterrence. It is a well-proven regulator of travel speeds on the network but requires ongoing investment. We believe it is vital to continue and optimise the Traffic Enforcement Camera program in Tasmania while supplementing it with a physical police presence. The imminent review of the Traffic Enforcement Camera program should provide clear guidance on the optimal mix of enforcement activities.
- Enforcement also has the potential to shape community attitudes towards speed, fostering a form of social enforcement about acceptable and safe behaviour. This has been successfully demonstrated in drink-driving initiatives.
- This initiative should be complemented by ensuring consistency and robust community engagement, as previously highlighted.

Consultation question 6: What is your view about measures to positively influence community attitudes regarding vehicle speed?

The Government's Speed Management Strategy Consultation Paper states:

> *We need to better understand community attitudes and behaviour around vehicle speed to guide communication and community discussion on speed management. This will include more frequent engagement and collecting views and attitudes towards speed-related issues.*
>
> *To help the community better understand the role of speed in road safety, there is a place for evidence-informed communication and community education tools.*
>
> *The Strategy will build on existing community education campaigns around speed, dangers of speeding, and the importance of better managing speed on Tasmanian roads.*

RACT's response:

- This action area is a key priority for RACT, and we generally support the proposed actions. However, we recommend expanding the focus beyond driver and rider behaviour to include a broader effort to deepen the community's understanding of speed management, the benefits it can bring, and to unpack perceived and real 'costs' to individuals.
- Speed is a complex issue, and our community is diverse in its understanding, beliefs, and attitudes. Investing in understanding and engaging with the various groups within our community is essential, working collaboratively with them to develop potential solutions.

- We reiterate the need for a structured plan that involves grassroots-level engagement and solution-finding, change management, effective communication, and broader community involvement.
- Insights from our member surveys indicate that most community members will appreciate and support the rationale behind improved speed management if they are meaningfully included in the process. Achieving this requires significant investment in building a strong foundation to help the community understand the need for change, educating them on the science and evidence underpinning appropriate speed management, and fostering trust through transparent communication.

Consultation question 7: What is your view about Vehicle technology that supports safe travel speeds?

The Government's Speed Management Strategy Consultation Paper states:

> *It is important that we continue to monitor the research and ongoing developments in vehicle technology that can support drivers to make safer speed choices. This includes both passive and active vehicle safety technologies.*
>
> *Opportunities for action in this area include promoting speed-related safety features in vehicles, as well as other technology options to support road users.*

RACT's response:

- We support these actions, which align with our Safe Vehicle Policy. Our related policy positions, such as advocating for all stakeholders to work towards reducing the average fleet age in Tasmania, will further support improved speed compliance.
- We continue to advocate for increased education and awareness campaigns for those purchasing new and used vehicles, highlighting safety ratings, safety features, and their benefits. This includes targeted campaigns for parents of young drivers, who are often highly motivated to help secure safer vehicles. These campaigns should also emphasise features that assist with speed management.
- As Tasmania transitions over time to a safer vehicle fleet, we advocate for a stronger focus on retrofitting Advanced Driver Assistance Systems (ADAS) into existing vehicles, particularly through targeted initiatives for fleet operators, with government leading by example.
- Additionally, we recognise opportunities to lobby the Federal Government for action on relevant national initiatives as they arise.

Consultation question 8: Are these the right outcomes, or should other outcomes be considered?

The Government's Speed Management Strategy Consultation Paper states:

> *Outcomes*
>
> *The aim of the Strategy is to help reduce the number of people who are seriously injured or killed, supporting safe vehicle travel speeds on Tasmanian roads – this is the ultimate outcome of best practice speed management. To achieve this, the following outcomes are proposed:*
>
> - *Increased guidance for speed management action on the whole Tasmanian network*
> - *Increased identification of safety and speed related risks on the road network*
> - *Increased alignment between safety tolerances of network infrastructure and posted speed limits*
> - *Increased strategic enforcement of speed limits to reduce network safety risk*
> - *Increased community support for safer speeds*

- *Increased awareness of the role of vehicle technology in safe speeds*
- *Increased broader benefits from the implementation of safe speeds*

RACT's response:

- We support the proposed outcomes.
- However, rather than focusing solely on "increased community support," we suggest broadening this to "increased community engagement, understanding and support." This change highlights the importance of building community knowledge to drive social change around speed management, ultimately fostering lasting support.
- Achieving these outcomes will also require addressing individual desire and motivation to change behaviours.

Consultation question 9: What else should we be including in this Strategy to improve road safety through speed management?

RACT's response:

- We recommend including variable speed limits in the Strategy. These speed limits, displayed via electronic signs, adjust during times of specific activities. They provide a valuable way to address risks that arise only at certain times, such as near activity centres, schools, motorways, and even intersections. Variable speed limits have already proven successful in schools and on motorways in Tasmania (Tasman Highway from Liverpool Street, Hobart to the Cambridge Interchange, including the Tasman Bridge) and could be further explored for use in other locations. This approach can also help build community confidence by demonstrating that speed limits are tailored to actual risk levels.
- We are particularly interested in seeing the Tasmanian Government investigate Side Road Activated Speeds, similar to successful implementations in Victoria, South Australia, and New Zealand. These systems lower speed limits on main roads only when a vehicle is detected approaching from a side road.
- While these initiatives are being developed and implemented, we believe there is an increasing need to support the community in "driving to the conditions" as best they can. This may involve collaborating with the community to develop messages and campaigns that reinforce this principle.

Consultation question 10: Do you have any other views about the approach we are taking in this Strategy?

RACT's response:

- We would like to see clearer details regarding the next steps for the development and implementation of the Strategy.
- We strongly encourage a focus on individual community engagement and co-design opportunities in the development and implementation of required actions and communication efforts.
- Additionally, it would be beneficial to include a process for establishing benchmarks for the elements identified within the Strategy. This would support ongoing monitoring, road surveys, periodic target reviews, and continuous improvement.
- We also encourage a commitment of resources and timelines, while acknowledging the challenges associated with implementing long-term government strategies.