

**Submission  
No 376**

## **MOBILE SPEED CAMERA ENFORCEMENT PROGRAMS IN NSW**

**Organisation:** Canberra Region Joint Organisation

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The Chair  
NSW Joint Standing Committee on Road Safety (Staysafe)  
NSW Parliament House  
Macquarie Street  
Sydney NSW 2000  
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### **CRJO Submission to Road Safety Committee Re: Mobile Speed Camera Enforcement**

The Canberra Region Joint Organisation (CRJO) commends the NSW Government for ongoing efforts to reduce road safety incidents across the state. In many cases, these efforts have involved collaboration with member councils to implement strategies and tools to encourage safe motorist behaviour. In order to improve the efficiency of programs under the 'Toward Zero' banner, the CRJO believes that greater community consultation and collaboration between state government and local councils is imperative.

The Canberra Region is a unique and diverse geographic region which stretches from the South-West slopes, through the Sydney-Canberra corridor across the Eurobodalla down to the Sapphire Coast and then to the Snowy Mountains. The CRJO<sup>1</sup> consists of ten (10) member councils, three (3) associate members and one (1) affiliate member. The total population of the CRJO region, including the ACT, is 750,000 (2017) with a total area of 48,000km<sup>2</sup> and a gross regional product (GRP) of \$9.82 billion.

The CRJO provides a forum for councils, state agencies and other stakeholders to work together at a regional level to identify shared priorities. This regional collaboration helps deliver important regional projects, delivering better outcomes for communities.

The following submission outlines several matters that the CRJO believe warrant consideration by the Staysafe Committee as part of the inquiry into mobile speed cameras.

#### **1. Current and new site nomination, community consultation, and model relevance for regional communities.**

The NSW State Government encourage nomination for speed camera locations from the community via the Safer Roads NSW website. Road safety staff in Council are encouraged to promote this site with the community, as one of the recommended activities in the LGRSP

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<sup>1</sup> Member Councils: Bega Valley Shire, Eurobodalla, Snowy Monaro, Snowy Valleys, Queanbeyan-Palerang, Goulburn-Mulwaree, Hilltops, Yass Valley, Wingecarribee, Upper Lachlan. Associate Members: Wagga Wagga City Council, East Gippsland, ACT Government. Affiliate Member: Canberra Airport.



guidelines. While Council's road safety staff regularly promote the website with community members, local communities report seeing a lack of realised change or response to their nominations for over 3-4 years.

As an exemplar from a CRJO member council, Queanbeyan-Palerang Regional Council (QPRC) regularly receives feedback from residents and resident associations in two suburbs (Jerrabomberra and Googong) about their concerns of speeding, crash risks and lives at risk as a result of speeding. Despite mobile speed camera nominations by residents, no new mobile sites have been identified in QPRC LGA since 2018. Further, for the suburbs of Jerrabomberra and Googong, there are no mobile camera sites with the road network of their suburb which is where resident's experience the most amount of urban speeding and they view the biggest crash risk. Instead, the mobile speed camera activity that occurs in QPRC is on a set group of roads and sites that receive repetitive mobile speed camera activity like Ross Road, Southbar Road and Lanyon Drive. For residents in these areas, the NSW Government's messages of the Speed Camera Saves Lives campaign does not resonate with them and they report to Council their perception that their speed concerns aren't being addressed with all the tools that can be deployed.

Similar issues to those seen in QPRC arise in the case of Snowy Valleys Council, where locations of mobile speed cameras can be seen on the Transport for NSW website:

<https://roadsafety.transport.nsw.gov.au/speeding/speedcameras/current-locations.html>

In the Snowy Valleys LGA, these locations include roads with low incidences of reported crashes in the years 2015-2019. In Adelong, the location of mobile speed cameras is published along the Snowy Mountains Highway, anecdotally located at Sandy Gully Road (25 crashes). In Gilmore, the published sites of speed cameras are along Batlow Road (14 crashes) and the Snowy Mountains Highway (9 crashes). In Tumut, the published sites are Gocup Road (6 crashes that also include the Minjary location) and the Snowy Mountains Highway (13 crashes). The 16 crashes recorded for the Gocup Road/Snowy Mountains Highway intersection are not included as speed cameras have not been located in proximity of the intersection possibly because of the road geometry and road usage. The locations of the mobile speed cameras are sometimes on routes that appear justified according to reported crash data. The site frequently used on Batlow Road, Windowie is located within two hundreds meters of a memorial of a fatal road crash. However, many respondents have expressed frustration and cynicism that mobile speed cameras are not used on many of the roads with high occurrences of crashes, particularly along the Tumbarumba Road around Rosewood and are located in located at sites that are perceived to be safer than other routes.

The ongoing issues with speeding in these two LGAs reflect potential misplacement of mobile speed cameras, resulting in lower efficacy of safety interventions and ultimately act as a disservice the impacted communities. A lack of feedback and reasoning from the NSW



Government to residents as to why their speed camera nomination requests are unanswered is leading to feelings of being unheard and reducing the likelihood of compliance with future road safety measures.

**1.1. Consultation with Council regarding new site nominations.**

As demonstrated by member councils QPRC and Snowy Valleys Council, there is currently no consultation with Council regarding selection of site locations for mobile speed cameras. This is despite the fact that councils are best placed to have knowledge of local developments impacting the road network, access local traffic data, and receive feedback from local residents.

Considering the announced changes to the mobile speed camera program on 19 November 2020 by the NSW State Government, CRJO member councils would like to request consultation when new sites are to be nominated in their LGAs.

**1.2. Council consultation for deployment of mobile speed cameras to local roads.**

In addition to the lack of council consultation regarding site selection for mobile speed cameras, no council consultation occurs from State Government regarding the deployment of mobile speed cameras on local roads. The NSW Audit Officer Report into Mobile Speed Camera (20198) noted that mobile speed camera deployment is coordinated with Police Patrols to ensure their enforcement schedules are shared and not operating within 1 kilometre of each other and that mobile speed camera deployments are responding to NSW police requests. The mobile speed camera program, however, is regularly deployed to Council roads and there is no coordination with Council over the deployment or any mechanism for mobile speed camera deployments to respond to Council requests. Council can have road works on mobile speed camera sites and have no mechanism for notifying or coordinated the road works in relation to impacting mobile speed camera activity.

Similarly, Council coordinates local strategies to address speeding like deployment of speed trailer for courtesy speed checks and slow down speed messaging yet has no mechanism for coordinating this strategy with mobile speed camera activity. Councils also collect speed data from the road network, particularly responding to emerging speed trends, although there is no mechanism for this information to be factored into the mobile speed camera program.

**1.3. Research, modelling, and the evidence base of fatality and serious injury reduction.**

As is always the case, issues in regional and rural areas differ dramatically than those in the metropolitan areas. The research and modelling need to be equally focused on roads outside these metropolitan areas which have lower traffic volumes, but also suffer from inferior road networks, interfacing with rural primary activities. While the recent advertising campaign on



deaths on rural roads has been a great incentive, the concentration on funding in these areas, although increased, is not sufficient to mitigate the dangerous driving environment faced by the regional population.

As an exemplar, reports since 2014 in member council, Bega Valley, indicate there have been 23 fatalities, almost an average of 3 per year. Of these 23 fatalities, 19 were on the council road network, equalling 82.65% of fatalities. This indicates the local government road networks are seriously lacking funding for road safety improvements. Although there are several Grant funding opportunities provided by both the State and Federal Governments, these are in an openly competitive market against both regional and metropolitan councils.

## **2. Changes to enforcement hours, strategy, and funding.**

### **2.1. *Increased enforcement hours.***

The CRJO are in favour of the proposed increase in enforcement hours due to the intended outcome of deterring speeding behaviour. As has been observed in our member councils, the Police enforcement seems to be focused on high speed/high volume roads rather than high speed/low volume roads that exist in the regional areas. Although the current focus may appear to be based on income generation, there now avails an opportunity to convey otherwise to the community.

### **2.2. *Enforcement strategies.***

A more balanced approach may be that each highway patrol unit needs a defined percentage of their surveillance and compliance being reassigned to regional roads with significant “black spot” areas. The mobile speed cameras give a real opportunity for these black spot locations to be continually under surveillance, without the requirement of a fee-based return. Compliance and enforcement are just one element of the overall mix of measures to change driver behaviour in the safe system methodology. Compliance is not the only element and should not be solely relied on as the safe system framework has 4 key elements to be addressed: safer vehicles, safer speeds, safer roads and safer road users.

### **2.3. *Reduction of visibility and warning signs.***

The CRJO are not in favour of limiting visibility of vehicles and removal of warning signs for mobile speed cameras. Local community stakeholders in select member councils, including Goulburn Mulwaree Regional Council, believe that warnings signs are a deterrent for motorists to speed.



#### **2.4. *Ongoing funding of road safety and the Community Road Safety Fund.***

Since the recent relaxation of the requirements for the visibility of the mobile speed camera units, it has been evidenced these units are disproportionately located on the state road network, with minimal surveillance on the local road network. As indicated earlier, since 2014 there have been 23 fatalities in the Bega Valley Shire Council, almost an average of 3 per year. Of these 23 fatalities, 19 were on the Council road network, equalling 82.65% of fatalities. This indicates the local government road networks are seriously lacking funding for road safety improvements. Enforcement contracts need to be more proportionally focused on the local road network, to increase the chances of these roads being fatality free.

The state government needs to continue its increased efforts to make funds available to regional Councils. However, government needs to bring the communities along the journey with them on the Road Safety Programs through better public campaigns, with a community desired balance between advertising campaigns and physical road safety improvements. Regional councils possess the largest proportion of rural road network with posted speed limits of 100km/h and roadside environments often with compromised clear zones with obstacles or lack of guarding that can contribute to incidents. The road death statistics on regional roads demonstrate a disproportionality between the motoring public population versus regional road deaths.

### **3. Revenue produced by mobile speed cameras.**

#### **3.1. *Community perception.***

The CRJO supports any implementation of road safety initiatives. However, the timing of the recent changes is difficult given the perceived lack of support from regional communities for mobile speed cameras, such as in the Bega Valley Shire Council, QPRC, and Snowy Valleys Council. Members in these communities express the view that mobile speed cameras as an income stream for the state government to spend in other areas outside road safety. A campaign by the state government is needed to indicate to the motoring public the percentage of revenue raised from mobile speed cameras that is expended on road safety programs and network improvements.

#### **3.2. *Utilisation of revenue in local communities.***

Beyond these concerns, member councils, Bega Valley Shire Council and Goulburn Mulwaree Regional Council, believe that the revenue raised from mobile speed cameras would be best utilized within local communities on motorist education programs, focusing on the dangers and consequences of speeding. This belief aligns with the submission by the Institute of Public Works Engineering Australia and such initiatives would directly contribute to the Toward Zero goal.



#### **4. Disproportionate impacts on disadvantaged community members.**

Unfortunately, due to the limited population outside the metropolitan areas, lower income streams, directly associated with mobile speed camera fines is disproportionate. Due to the current constraints from rate pegging, local government is generally reliant on grant funding opportunities for road safety upgrades. Although, these grants are made available state-wide, there is a very competitive market to secure the available funding. Quite often the most affected Councils are unable to access these funding streams due to lack of associated professional staff or competing priorities given the application window time frame.

##### **4.1. *The impact to people living in regional and rural areas.***

Regional and rural populations are heavily reliant on the motor vehicle as their only source of travel due to the lack of public transport being available. The remoteness of these locations also has the adverse effect of the reliance on increased freight transport for the delivery of goods. There is a desire to open up more areas for freight transport, however without an increase in freight network funding. This places the low order rural roads in jeopardy of earlier failure and competition of motor vehicle versus heavy vehicle on this narrower pavements and generally inferior sight lines.

##### **4.2. *Those of low socio-economic backgrounds and Indigenous people.***

As indicated, regional and rural populations are heavily reliant on the motor vehicle as their only source of travel due to the lack of public transport being available. Increased subsidies need to be considered along similar lines of the refund on registration for high toll use in the Sydney metropolitan areas. This could be based on similar refunds on vehicle registration, however with the emphasis on kilometres travelled, which could be checked through pink slip inspections or through fuel cards/credit cards with speedometer readings input.

There are also concerns from community members in the Snowy Valleys LGA with regard to the expense of fines relative to household income. The \$125 fine for under 10 km/hr and \$285 for between 10 to 20 km/hr are significant financial burdens to a household where the income is limited. For example, the median household weekly income in Batlow is \$910, the weekly rent is \$150 and mortgage repayments are likely to be between \$1000 to \$1399, leaving between \$620 to \$760 for the rest of living expenses. Fines of under 10 km/hr were frequently mentioned with one excuse being the fitting of new tires to a car (new tires have a larger diameter and the increase of actual speed compared to indicated speed can be as much as 4%) and have caused hardship in low socioeconomic families. This financial burden is not as much as a deterrent in urban areas where the median family income is significantly higher and therefore the fine is a lower portion of household income.



**4.3. *The impact on provisional license holders.***

Regional and rural P plate drivers are potentially the highest impacted drivers through a combination of lowest level of driving experience versus number of demerit points available. A significant proportion of P plate drivers in the regional and rural areas are reliant on their license to get to and from education establishments along with employment opportunities and social interaction. A more just system may need to be considered in these areas, especially where public transport is less available, for example a regional/rural work-related license other than what is currently available through the courts system.

The CRJO thanks you for the opportunity to comment on these changes to road safety measures that greatly impact our communities. The CRJO look forward to continuing to work with the Joint Standing Committee on Road Safety to deliver safer roads to the entire Canberra Region. Should you require further information in relation to this submission please contact the [REDACTED]

Yours sincerely,



**Cr Rowena Abbey**  
Chair | Canberra Region Joint Organisation

9 July 2021