

**Submission
No 581**

MOBILE SPEED CAMERA ENFORCEMENT PROGRAMS IN NSW

Organisation: National Roads and Motorists' Association (NRMA)

Date Received: 9 July 2021



09 July 2021

Joint Standing Committee on Road Safety
Parliament of NSW
Macquarie Street
SYDNEY NSW 2000

To the Committee

**Submission to the NSW Parliamentary Inquiry into
Mobile Speed Camera Enforcement Programs in NSW**

Please find attached a submission from the NRMA to the NSW Parliamentary Inquiry into Mobile Speed Camera Enforcement Programs in NSW.

As the largest mutual in Australia with more than 2.7 million Members, the NRMA works with government, industry and community to advocate for continued improvements to Australia's road and transport networks to ensure safety, efficiency and equitability.

Through collaboration, the NRMA strives to ensure that mobility networks and associated infrastructure and services are considered holistically to improve planning, utilisation and productivity.

Should further information on the NRMA's submission be required, please do not hesitate to contact me at [REDACTED]

Yours faithfully

[REDACTED]

Robert Giltinan
Director of Policy & Public Affairs



Submission to the Inquiry into Mobile Speed Camera Enforcement Programs in NSW

A Brief History

- The NSW Mobile Speed Camera Program (MSCP) was introduced in July 2010 with the support of the NRMA. While the NRMA advocated for warning and education signs (i.e. the speed limit) to accompany the MSCP, it was introduced to operate covertly.
- In July 2011, the Audit Office of NSW issued a report on improving road safety and speed cameras.¹ The audit assessed whether fixed, safety and mobile speed cameras were in places that reduce speeding to make roads safer. While the audit concluded that speed cameras generally changed driver behaviour and reduced crashes, injuries and fatalities, it also noted that it was too soon to determine the long term impacts these devices may have on road safety.

One of the Auditor-General's recommendations was for an overarching strategy for speed cameras – incorporating all camera types – to be developed by March 2012.

- In response to the Auditor-General's recommendations, the NSW Speed Camera Strategy was unveiled in June 2012.² The Strategy included a significant revision to the MSCP through the provision of warning signs on approach to cameras and increased detection vehicle livery, effectively making the MSCP overt.
- In October 2018, the Audit Office of NSW issued a report on mobile speed cameras.³ The audit assessed whether the MSCP was being effectively managed to maximise road safety benefits.

The audit concluded:

“The mobile speed camera program requires improvements to key aspects of its management to maximise road safety benefits. While camera locations have been selected based on crash history, the limited number of locations restricts network coverage. It also makes enforcement more predictable, reducing the ability to provide a general deterrence. Implementation of the program has been consistent with government decisions to limit its hours of operation and use multiple warning signs. These factors limit the ability of the mobile speed camera program to effectively deliver a broad general network deterrence from speeding”.

Key findings of the audit included:

- MSCP performance would be improved if more locations were used.
- The MSCP schedule is not random.
- There is no supporting justification to explain how hours of operation were determined.

¹ www.audit.nsw.gov.au/sites/default/files/pdf-downloads/2011_Jul_Report_Improving_road_safety_speed_cameras.pdf

² <https://roads-waterways.transport.nsw.gov.au/documents/about/news-events/news/ministerial/120601-speed-cameras.pdf>

³ <https://www.audit.nsw.gov.au/our-work/reports/mobile-speed-cameras>



- Signage requirements limit the effectiveness of the program.
- There is limited evidence the MSCP has created a general network deterrence.
- There is limited oversight of compliance with procedures and infringement culling.

One of the Auditor-General's recommendations was for the NSW Speed Camera Strategy to be reviewed to ensure the MSCP provides an effective general deterrence and complement other speed enforcement activities.

According to Transport for NSW's Speed Camera Programs: 2019 Annual Review, to date, the MSCP delivered 7,000 hours of enforcement per month at 1,024 locations.⁴

- In response to the Auditor-General's recommendations, the NSW Centre for Road Safety conducted a review, which culminated in the publication of a report entitled Mobile speed camera operations in other Australian jurisdictions in October 2020.⁵

The report identified differences between the mobile speed camera programs in NSW, Victoria, Queensland, Western Australia, South Australia and the ACT. The two most significant differences (according to the report) were:

- The [NSW] MSCP was more visible to drivers than those in other jurisdictions.
- The [NSW] MSCP was the least intense, in terms of hours of operation per head of population or hours of operation per registered vehicle.

Other differences included:

- The number of sites where mobile speed cameras are deployed.
 - The focus between improving compliance with speed limits at a particular site or road section, and promoting compliance across the entire road network.
- In November 2020, changes to the MSCP were announced, including increased enforcement hours, a reduction in high visibility livery on vehicles, and the removal of warning signs.⁶

The NSW Centre for Road Safety's website states:

"These changes bring NSW into line with how other Australian jurisdictions run their programs and better practice, as outlined in the 'Mobile speed camera operations in other Australian jurisdictions' research report, and were recommended by the NSW Auditor General. Independent modelling from Monash University Accident Research Centre identified that these enhancements to the mobile speed camera program may save between 34 and 43 lives and prevent around 600 serious injuries in NSW each year. We want people to know they can be caught anywhere, anytime on the NSW road network, to reduce speed-related trauma on roads".

⁴ <https://roadsafety.transport.nsw.gov.au/downloads/2019-speed-camera-review.pdf>

⁵ <https://roadsafety.transport.nsw.gov.au/downloads/msc-better-practice-review-research-report.pdf>

⁶ <https://roadsafety.transport.nsw.gov.au/speeding/speedcameras/mobile-speed-cameras.html>



Australian Jurisdictional Approaches to Mobile Speed Camera Visibility

Prior to changes to the [NSW] MSCP in November 2020, the practice in NSW was to place warning signs 250m and 50m before the location of a mobile speed camera, as well as 50m after the camera; the detection vehicle was also extensively marked, making the MSCP highly visible or overt.

At the other end of the visibility spectrum are the comparable programs in Victoria, South Australia and Western Australia, which are completely covert with no warning signs or markings on detection vehicles.

In between these two extremes are:

- Queensland, where mobile speed cameras have historically operated overtly (although initially with only one warning sign, and with less visible markings on detection vehicles than NSW). Since July 2015, the operations have become more covert, with the removal of the warning sign, although most detection vehicles remain identifiable.
- ACT, where there is a sign on top of the detection vehicle but otherwise no warning signs or vehicle markings.

The NSW Centre for Road Safety's October 2020 report entitled Mobile speed camera operations in other Australian jurisdictions considers operations both in terms of hours of deployment and the model of deployment.

Regarding mobile speed cameras, the report submits that, when targeting transient offences (such as speeding) and aiming for network-wide compliance, highly visible operations are not optimal.

Because it is not possible to have speed cameras monitoring the entire road network on a 24/7 basis (detering speeding at all times and places), *“the intention is to generate in each driver the expectation that if he or she is speeding – anywhere, anytime – detection is likely. There should be no time or place (or as few as possible) where a driver can feel confident that speeding would not be penalised.”*⁷

As submitted by the report, an expectation of detection 'anytime, anywhere' can be increased by:

- Extending mobile speed camera operations to a greater number of sites.
- Increasing enforcement intensity (i.e. more hours of mobile speed camera operations).
- Making mobile speed camera operations more covert in nature.

The report summary states that *“Victoria had a reduction of 27% in fatal crashes from a package that included a 50% increase in covert mobile speed camera hours.”* But whether this is due to the increase in hours or the covert nature of the increased hours is unknown, as Victoria has never had visible or overt mobile speed camera operations.

The report further states in summary that *“NSW has fewer mobile camera operating hours than other jurisdictions, related to population and the number of registered vehicles. Queensland benefited substantially from a 50% increase in mobile camera operating hours. For Victoria, the ACT and Western Australia, statistical modelling indicates that these other jurisdictions would achieve substantial benefits from an increase in hours. All these jurisdictions start from a higher intensity than NSW's and therefore could expect lesser marginal returns”.*

⁷ <https://roadsafety.transport.nsw.gov.au/downloads/msc-better-practice-review-research-report.pdf>



MUARC Research Note

Independent analysis to estimate the potential benefits of expanding the [NSW] MSCP was carried out by the Monash University Accident Research Centre (MUARC). MUARC's Research Note was released publicly in June 2021.⁸

The Research Note considers the expansion of the MSCP both in terms of increasing hours of deployment, and changing the model of deployment by decreasing the visibility/overtness of operations.

MUARC's modelling methodology is based on the following expectations:

- Crash effects are expanded from 250m [the area of influence associated with NSW's policy on warning signs for mobile speed cameras prior to the most recent changes in November 2020] to the entire road length chosen for enforcement [prior to 2017, the average length of an enforced road segment in NSW was around 13.1km].
- Any expansion of the program would involve the enforcement of additional road segments, with the increase in the number of road segments enforced proportionate to the increase in the number of hours enforced. This means that the enforcement density in terms of hours enforced per road segment remains constant.
- Any increase in geographical area influenced by the mobile speed cameras through either changing the signage policy or including additional enforced road lengths in the program would achieve the same crash reduction benefits on the newly enforced areas as given in Table 1.
- The proportionate coverage of fatalities or serious injuries of the total NSW fatal or serious injury population from road crashes per area covered by enforcement will remain the same for any additional road lengths chosen to enforce in any expansion of the program (the current program covers around 6% of the NSW fatality population and 2.9% of the serious injury population).

MUARC's Research Note concludes that expanding the MSCP could reduce annual fatalities by up to 54 and serious injuries by up to 1,127 while providing an associated cost saving of \$984,342,026.49.

These potential reductions and savings are reliant on many factors, including the validity of the assumptions, the chosen deployment model [7,000, 10,500, 13,000 or 21,000 hours of enforcement per month; overt signage, largely overt signage or covert signage], and how the program expansion is progressed and implemented.

MUARC's Research Note states:

"Whether these potential savings are ultimately realised through expansion of the program depends on a number of factors including the validity of the modelling assumptions and the way in which the program expansion is implemented. Implementation factors critical to realising benefits under the expansion include appropriate selection of new road lengths to enforce and the selection of actual sites within these to place the cameras. Adoption of the Victorian model will also likely involve the selection of additional sites for camera operations on the currently enforced road lengths. Appropriate scheduling of operations across existing and expansion sites using randomised scheduling within time and location is likely to be required to fully realise program benefits".

⁸ <https://roadsafety.transport.nsw.gov.au/downloads/msc-expanded-benefits.pdf>



NRMA Policy

The NRMA has long supported using mobile speed cameras, warning and education signs.

Mobile speed cameras act as an important tool to combat speeding and form part of an overall approach or strategy to making roadways safer. The NRMA is supportive in principle of expanding the NSW Mobile Speed Camera Program.

Warning and education signs are important tools that encourage better driver behaviour on roadways and educate drivers. The NRMA policy on warning and education signs is consistent across all forms of detection cameras.

Making sure that drivers slow down – particularly in areas where there is a demonstrated history of crashes – is critical in helping to reduce fatalities and serious injuries on roadways.

Warning and education signs come in many forms, and there are appropriate installations for each type of detection camera, depending on the desired outcome.

NSW Mobile Speed Camera Program

Regarding the NSW Mobile Speed Camera Program in its current form, the NRMA would like to see:

- The program expanded and integrated into the forthcoming NSW Road Safety Action Plan;
- Sites for operation selected on criteria that first and foremost aim to reduce fatalities and injuries;
- Warning signs introduced to create a general speed deterrence effect across the road network while reminding drivers to slow down at particular locations or areas of increased risk; and
- Education signs or road markings (i.e. the speed limit) introduced at approved detection sites.

In regard to warning and education signs, the NRMA believes that appropriate installations will:

- Help internalise better driver behaviour on roadways;
- Educate drivers in relation to speed limits at approved detection sites;
- Create a general speed deterrence effect across the network, maintaining the integrity of the MUARC Research Note and the Centre for Road Safety's October 2020 report; and
- Improve public confidence in the NSW Mobile Speed Camera Program.

High Visibility Policing

The NRMA believes that the best way to tackle speeding and other forms of bad driver behaviour is through a range of measures, including a more visible police presence on roadways. More police on roadways means that inappropriate driver behaviour can be detected and stopped.

A survey of 1,141 NRMA Members in 2020 found that 82 per cent believed an on-the-spot penalty notice or warning from a Police Officer was the most effective way to change bad driver behaviour.

The survey also found that 68 per cent believed there should be more marked highway patrols on the state's roads. Seeing marked highway patrols on the road has a significant impact on drivers' behaviour:

- 59 per cent are more conscious of driving within the speed limit.
- 53 per cent are generally more careful about their driving behaviours.
- 46 per cent are more alert to obeying the road rules.



NRMA Key Messaging

- The forthcoming NSW Road Safety Action Plan provides an opportunity to consider road safety and associated programs and initiatives holistically.
- The NRMA's highest priority is road safety and expanding the Mobile Speed Camera Program in NSW is supported in principle.
- Warning and education signs act as important tools to help to internalise better driver behaviour on roadways and educate drivers.
- Warning and education signs come in many forms, and their appropriate installation to support the objectives of the Mobile Speed Camera Program in NSW would be welcomed.
- The NRMA welcomes the additional 250 Police Officers in the 2021–22 NSW Budget. It is critical that we now see more of them dedicated to patrolling NSW roads, tackling bad driver behaviour and reducing the road toll.
- The NRMA is committed to continuing to work with government, industry and community to support continued road safety and societal improvements.