

**Submission
No 67**

SPEED LIMITS AND ROAD SAFETY IN REGIONAL NSW

Organisation: Local Government NSW and Roads & Transport Directorate

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LOCAL
GOVERNMENT
NSW



NSW & ACT

IPWEA

INSTITUTE OF PUBLIC WORKS
ENGINEERING AUSTRALASIA

**SPEED LIMITS
AND ROAD SAFETY
IN REGIONAL NSW**

STAYS SAFE

**JUL
2022**

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1. Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

LGNSW welcomes the opportunity to make a joint submission with the Roads & Transport Directorate (RTD) to the NSW Joint Standing Committee on Road Safety (StaySafe) inquiry into Speed limits and road safety in regional NSW.

The RTD, established in 2004, is a joint initiative between IPWEA (NSW & ACT) and LGNSW. It serves as a focus for research activities and the provision of technical advice to assist members in discharging their road management roles. The RTD represents key stakeholders focused on planning, delivery, and management of roads and transport services.

NSW councils are responsible for around 90 percent of the road network (163,850km) with an estimated value of \$65.7 billion. Local government has a direct interest in and responsibility for the safety of drivers, passengers, riders and pedestrians using that network. Furthermore, councils and communities are concerned about the standard of local road infrastructure, road safety and amenity.

This submission highlights the important role played by local councils as road managers. It is important to understand the three-tier hierarchy of state, regional and local roads and those that are responsible for the management of the road infrastructure.

State Roads are the primary network for the movement of people and goods within and between urban centres. The NSW State Government is responsible for management of State Roads. Regional Roads are the secondary road network for travel between smaller towns and districts and perform a sub-arterial function within major urban centres. The responsibility for management of Regional Roads rests with NSW councils, though significant financial support is provided by the NSW State Government. Local Roads comprise the remaining council managed roads and are utilised by communities for local access. It is worth noting that the vast majority of the road network in NSW is the local road network.

Given the variance of the roads network infrastructure, LGNSW and the RTD would like to see strategies introduced by the State Government that provide awareness to drivers on handling poorer road conditions and design. This may include educating drivers to 'drive to the (road infrastructure) conditions.' The education is recommended to address speeding, driver behaviour, changing environmental factors and driving to the road infrastructure conditions. Other strategies such as a universal reduction in speed limits to curb risk-taking driver behaviour are not supported by LGNSW and the RTD. As discussed in section 3a, a case-by-case analysis of speed limits in partnership with local road managers would be supported. LGNSW and RTD strongly support increased investment in the road network to improve road safety. This includes increased funding for the NSW and Australian Government Black Spot programs.

2. Background

On 1 June 2022, the StaySafe Committee called for submissions to its inquiry. This submission is structured to reflect the inquiry's Terms of Reference and LGNSW and the RTD has offered recommendations where appropriate for consideration by the Committee.

The Terms of Reference for the inquiry are:

- a) The impact of speed limits and travel times on driver behaviour and safety
- b) The impact of improved vehicle technology and road infrastructure
- c) The use of variable speed limits
- d) Any other related matters

3. Response

a) The impact of speed limits and travel times on driver behaviour and safety

The 2026 Road Safety Action Plan (RSAP) released in April 2022 by Transport for NSW (TfNSW) was developed to improve road and vehicle safety, safer speed limits, better enforcement and road user behaviour and is warmly welcomed by LGNSW and the RTD. The plan adopts the Safe System approach to achieving a safe transport system and provides a long-term strategy to drive road safety in our community. The 'safe system' approach to road safety involves an integrated and holistic view of the road transport system and the interactions between road infrastructure, roadsides, travel speeds, vehicles and road users. The Safe System approach accepts that road users will make errors but this should not result in fatal or serious injuries. Its vision aims to provide road infrastructure and speed limits that will minimise this risk in the event of a crash. However, this approach must involve the State Government fully engaging with councils and assisting them to imbed appropriate local-government-specific road safety/safe systems considerations in their road, asset and integrated planning strategies. The (RSAP) needs to be adequately funded if it is to succeed.

The 'Best Practice Speed Information Management' by Austroads states that 'it is widely accepted that there is a strong relationship between speeds and road safety. Increases in travel speed can increase both the likelihood of a casualty crash occurring and the severity of injury.'¹ In addition, 'each year, around two-thirds of fatalities on NSW roads occur in country areas. Of these, 60 per cent occur on high-speed roads (100km/h or more). With over 80 per cent of the rural road network made up of roads with a speed limit of 100km/h, reducing risks on high-speed rural roads remains a key challenge and priority in NSW.'² Safe speed involves setting the speed limit appropriate for the road environment. This considers the road environment characteristics such as traffic volume, traffic mix, roadside hazards, carriageway width, road alignment, road condition and presence of cyclists and pedestrians. Harm minimisation is a core component of the safe speed concept. LGNSW and the RTD recognise that speed is the leading cause of fatal crashes on regional roads. Reducing speed on its own is not the single solution, as other factors

¹ [Best Practice Speed Information Management 2022](#), p. 1

² [2026 Road Safety Action Plan](#), p. 11

such as road condition and design, road infrastructure, are contributing factors in fatal crashes and should not be overlooked.

With respect to speed limits below 60km/h in urban or built-up areas, it is important that local councils have a direct say, in determining speed limits. In response to a motion from Blue Mountains City Council, LGNSW's 2020 Annual Conference resolved that the NSW Government be requested to review the criteria for speed zones of less than 50km/h, especially on roads where there are no footpaths or walkable verges, to include a category for local roads that are shared by pedestrians and other vulnerable road users, due to the design and topography of these roads.

LGNSW and the RTD recognise that a reduction of speed on local roads can create a "polarising response from community,"³ as seen by Sydney's Inner West Council in June 2022. A motion was presented to council to investigate implementing 30km/h speed limits on streets near schools or with high pedestrian and cyclist activity. The motion was met with a "fierce reaction from concerned citizens." The intent is to counter driver behaviour and excessive speeding, however these changes would require extensive public consultation and the support of TfNSW. This situation would not be unfamiliar to rural communities throughout NSW.

Currently, road users have no means to recognise the speed limit based on the road environment. Speed signs which are often sparse or poorly spaced are the only guidance available. This is confusing and results in a disproportional number of road users exceeding the speed limit. Rather than a universal reduction in speed limits, LGNSW and the RTD support speed limits being determined on a case-by-case basis, against an agreed framework, in accordance with local road conditions and road user needs. This process should include consultation with local councils, who are often best placed to provide local knowledge and input to the review process. In addition, whilst much of the conversation on speed limits focusses on the advantages to road safety of decreasing speed limits, it is important to recognise the socio-economic impacts on local communities that would result from a speed limit reduction. These include increases in travel time and the corresponding impact on driver fatigue and community amenity. LGNSW and the RTD recognise that the current risk appetite acknowledges the risks of using the roads network and the balance of the socio-economic impacts on local communities.

LGNSW and the RTD also caution that universal reductions in speed zones in regional areas could result in the unintended outcome of decreased funding for regional roads. From a road management funding perspective, a road with a reduced speed limit would presumably meet the safety requirements of the new speed, and thus require less investment to improve the condition or safety of the road. Rather than a singular focus on speed reductions, LGNSW and the RTD strongly recommend an increase in the funding available to local councils to improve the condition of local roads, such that the overall safety of the road environment is improved, and the amenity of regional road users is not adversely affected.

While speed is a significant factor, other behavioural factors causing fatalities are identified in the 2026 (RSAP), which include 'tired drivers and riders, drink driving, illicit drugs and seatbelt non-usage' (RSAP, p. 12). LGNSW and the RTD wish to emphasise that road condition is also a significant factor in contributing to fatalities, especially where funding and capacity has impacted the management of the road. Effective strategies for speeding, distraction, fatigue and

³ [Sydney Inner West Council wants to lower the speed limit on all local Roads to 40km/h](#)

other human factors are different and specific to each contributing factor. Programs to influence human behaviour include education, enforcement, human centric design and the implementation of best practice speed limits. As crucial partners in translating 'safe system' principles into practice, local government needs to be adequately funded to deliver life-saving programs.

Local government, as the closest level of government to the community, is best placed to develop tailored programs to meet the specific needs of local communities, reflecting their unique local demographics such as age, cultural and linguistic diversity, socio-economic and other relevant factors. Local government does not currently have the funding necessary to develop such locally targeted programs. The funding of such programs needs to be recognised and made available as a critical component to address unsafe road use.

A reduction of speed limits (on roads 100km/h or more) in regional areas may potentially reduce accidents, however driver behaviour is unlikely to change given drivers are traveling considerable distances and aiming to reduce travel times. Furthermore, a reduction in speed limits may lead to an overall increase in risk taking behaviour due to the desire from some road users to mitigate perceived travel time impacts.

Recommendations

- 1. It is recommended that the 2026 Road Safety Action Plan be granted greater visibility amongst key stakeholders, including councils and road users. LGNSW encourages the NSW State Government to allocate funding to local councils to develop Road Safety Strategic Plans that complement the 2026 Road Safety Action Plan.*
- 2. It is recommended that the NSW Government review the NSW Speed Zoning Guidelines 2011, in collaboration with local government and other stakeholders to ensure that speed zones are conducive to the inherent road infrastructure, especially zones under 50kms where there are no footpaths or walkable verges.*
- 3. It is recommended that a consistent framework for determining speed zones be developed (across the default speed limits: 50 km/h in urban (built-up) areas through to 100 km/h in rural (non-built-up areas), including provision for local conditions to ensure road users understand the applicable speed limit based on the road environment; remove any ambiguity of speed zones caused by a lack of signage.*
- 4. It is recommended the framework outlined in recommendation three be implemented on a case-by-case basis and include consultation with local councils in the implementation process.*
- 5. It is recommended that greater collaboration be established among NSW Government agencies to ensure accurate and timely information relating to speed limits and travelled speeds are used for informing decision making to benefit users of the road network.*

b) The impact of improved vehicle technology and road infrastructure

The emerging and transforming technologies associated with connected and automated vehicles (CAVs) have implications for councils as road managers. While it is expected that these

changes will have road safety benefits, local government must be included when the Australian and State Governments and industry consider the policy, infrastructure and legislative changes that will be required, especially the implications for the local road network.

The degree of automation of a vehicle is commonly measured against guidelines developed by the Society of Automotive Engineers (SAE), who assess vehicles against a 0 – 5 scale of maturity based on the systems in operation in a vehicle.⁴ The 2026 RSAP states that ‘while emerging vehicle technologies and safety features can support behaviour change objectives and help prevent crashes, it takes time for these to become common, especially as the average age of a vehicle in NSW is 10 years.’ (RSAP, p. 12). In addition, Austroads projections indicate that it will be at least 10 years before the majority of vehicles are equipped with level 2 technologies (partial automation), and a further 30 years before all vehicles in the NSW fleet are equipped with level 5 technologies (full automation) (Austroads, 2020, Future Vehicles 2030, Austroads Ltd., Sydney Australia, p. 44).⁵ In the interim, ‘education and enforcement [including a strong penalty framework] of unsafe road user behaviour will remain important for the foreseeable future.’⁶ LGNSW and the RTD support the recommendation outlined in the RSAP that a trial targeted education program be developed to address risk taking by the small group of high-risk, repeat offenders who are outside the scope of current behavioural road safety initiatives (RSAP, p. 26).

The road infrastructure throughout regional NSW does not have many of the advanced safety features seen on highways and motorways in metropolitan areas. Unsealed roads (gravel, sand and dirt) and shoulders on highways must be navigated with caution and control to avoid crashing. Improved vehicle technology is likely to mitigate the loss of traction and control on unsealed roads and promote the safety of drivers and passengers. However, in order to fully maximise the benefit from improved vehicle technology, the quality and consistency of the regional road network needs to be improved. The technologies currently being implemented in CAVs are dependent on certain elements of road infrastructure being present in the road corridor (for example, centre and edge line marking).

Recommendations

6. *It is recommended that the State Government provide funding to upgrade regional road infrastructure (e.g. centre and edge line marking) such that it can accommodate emerging vehicle technologies to improve road safety.*

c) The use of variable speed limits

LGNSW and the RTD support the use of variable electronic speed limit signs, however, the use of these signs in regional areas are largely limited to tunnels and motorway sections on the State and federal road networks, where infrastructure is available to vary the speed limit based on the road conditions. It is not economically feasible to introduce this technology across the entire NSW road network.

⁴ [The Society of Automotive Engineers \(SAE\), 2021, Taxonomy and Definitions for Terms Related to Driving Automation Systems for On-Road Motor Vehicles](#)

⁵ [Austroads, 2020, Future Vehicles 2030, Austroads Ltd., Sydney Australia](#)

⁶ [2026 Road Safety Action Plan](#), p. 25

Variable seasonal speed zones are in use throughout rural and regional NSW and are commonly controlled using static signage. The variable speed limits in these zones mitigate poor road conditions due to rain, snow, fog or ice. LGNSW and the RTD support the implementation of a more extensive network of static variable speed signs in high-risk areas, as a means of reducing fatalities on regional roads. This is particularly important for regions in the aftermath of floods, storms and other natural disasters where roads have been damaged and obstructed. The implementation of new variable speed zones should be carried out in accordance with the safe systems approach outlined above. Enforcing variable speed zones in rural and regional areas may address the disturbing statistic that around 81 per cent of all fatal crashes on country roads involve local residents.

A greater emphasis should be given to the education of drivers to ‘drive to the (road infrastructure) conditions.’ This is particularly important on rural and regional roads where there are limited variable speed limits, poorer road conditions and design, higher speed limits, increased roadside hazards and few public transport or other options contribute to a greater risk and severity of a crash on regional roads.

Recommendations

- 7. It is recommended that the State Government broadens its approach to Road Safety to educate drivers on driving to the (road infrastructure) conditions.*

d) Any other related matters

The RTD has been collecting asset performance data for NSW local government since 2006. The latest report on this data shows that the current funding arrangements in NSW are inadequate to deliver safe, efficient and resilient infrastructure to the community and are not sufficiently large enough to enact either specific or isolated road safety treatments and improvements, or wider network-based approaches. The RTD estimate the current funding gap in NSW councils to be \$350 million annually.

The NSW 2022-23 Budget handed down on 21 June 2022, committed ongoing funding for a range of road programs, however it falls considerably short of addressing concerns of local councils, with funding levels largely unchanged. \$201.2 million was allocated for a range of regional transport programs including the Fixing Country Bridges program, continued planning and delivery of the 16 Cities program, and supporting regional councils through the Fixing Local Roads program.

Councils are disappointed that a meagre \$1.93 million over two years has been allocated to support the upgrades of priority regional roads as part of the Regional Road Transfer and Road Classification Review.

Integrating Road Safety Strategic Plans

The RTD has developed *A Guide to Developing Council Road Safety Strategic Plans - Roads & Transport Directorate*.⁷ The purpose of the guide is to assist and encourage local councils to develop road safety strategic plans and integrate them into the Local Government Integrated Planning and Reporting Framework (IPRF) if and where appropriate.

⁷ [A Guide to Developing Council Road Safety Strategic Plans - Roads & Transport Directorate \(roadsdirectorate.org.au\)](https://roadsdirectorate.org.au)

The Guide is based on 'best practice' methodology developed through systematic investigation, consultation and feedback on the experiences of a number of NSW councils. These councils represented a range of large and small, rural and urban local government areas that had developed and implemented road safety strategic plans. As a registered training organisation (RTO) the RTD is well placed to deliver education on this guide to NSW councils, though would require State Government funding to reduce the costs to councils to undertake such training.

The IPRF recognises that most communities share similar aspirations: a safe, healthy and pleasant place to live, a sustainable environment, and opportunities for social interaction, opportunities for education and employment, and reliable infrastructure. It also recognises that council plans and policies should not exist in isolation - that they are inter-connected.

This framework allows NSW councils to draw their various plans together, understand how they interact and get the maximum leverage from their efforts by planning holistically and sustainably for their community today and into the future.

To optimise road safety outcomes, council Road Safety Strategic Plans should link council and community activities in the achievement of road safety objectives within the broader framework of the council's Community Strategic Plan. This also brings the Council Road Safety Strategic Plan in line with the planning and reporting cycle required by the NSW Office of Local Government. The incorporation of Road Safety Strategic Plans into the IPRF elevates the importance of road safety as a broader community issue, requiring a whole-of-community response, and triggers important reporting mechanisms, achieving transparency and an informed community.

LGNSW and the RTD recognise the value of integrating road safety in current practices as a means to achieve the goals set out in the RSAP. However, while there are clear benefits of a more strategic approach, integrating road safety in IPRF's would involve additional costs and regulatory burdens for local government. To avoid cost shifting, additional funding and resources should be made available where a local council chooses to incorporate it into their IPRF's.

Recommendations

8. *It is recommended that the NSW Government provide increased funding and resources to improve the condition of local roads, such that the overall safety of the road environment is increased, and the amenity of regional road users in regional NSW is not adversely affected.*
9. *It is recommended that the NSW State Government provide increased funding for state roads and the NSW Black Spot program.*
10. *It is recommended that the NSW Government provide funding to NSW councils to assist in the training and implementation of Road Safety Strategic Plans.*

4. Recommendations

1. It is recommended that the 2026 Road Safety Action Plan be granted greater visibility amongst key stakeholders, including councils and road users. LGNSW encourages the NSW State Government to allocate funding to local councils to develop Road Safety Strategic Plans that complement the 2026 Road Safety Action Plan.
2. It is recommended that the NSW Government review the NSW Speed Zoning Guidelines 2011, in collaboration with local government and other stakeholders to ensure that speed

zones are conducive to the inherent road infrastructure, especially zones under 50kms where there are no footpaths or walkable verges.

3. It is recommended that a consistent framework for determining speed zones be developed (across the default speed limits: 50 km/h in urban (built-up) areas through to 100 km/h in rural (non-built-up areas), including provision for local conditions to ensure road users understand the applicable speed limit based on the road environment; remove any ambiguity of speed zones caused by a lack of signage.
4. It is recommended the framework outlined in recommendation three be implemented on a case-by-case basis and include consultation with local councils in the implementation process.
5. It is recommended that greater collaboration be established among NSW Government agencies to ensure accurate and timely information relating to speed limits and travelled speeds are used for informing decision making to benefit users of the road network.
6. It is recommended that the State Government provide funding to upgrade regional road infrastructure (e.g. centre and edge line marking) such that it can accommodate emerging vehicle technologies to improve road safety.
7. It is recommended that the State Government broadens its approach to Road Safety to educate drivers on driving to the (road infrastructure) conditions.
8. It is recommended that the NSW Government provide increased funding and resources to improve the condition of local roads, such that the overall safety of the road environment is increased, and the amenity of road users in regional NSW is not adversely affected.
9. It is recommended that the NSW State Government provide increased funding for state roads and the NSW Black Spot program.
10. It is recommended that the NSW Government provide funding to NSW councils to assist in the training and implementation of Road Safety Strategic Plans.

5. Conclusion

LGNSW and the RTD wishes to thank the NSW Joint Standing Committee on Road Safety (StaySafe) for the opportunity to provide a submission to this inquiry into 'Speed limits and road safety in regional NSW.' These are critical issues facing all residents of regional NSW and LGNSW and the RTD wish to emphasise again the importance of engaging local councils in speed, road safety and road infrastructure policy developments.

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