# Submission to Victoria Regulatory Analysis to reduce the open road default speed limit

## Introduction

SEATS (South East Australia Transport Strategy) provides highly co-ordinated and influential advocacy for the development of transport infrastructure in the South East Australian region that supports sustainable economic development and the prosperity of its constituents.

SEATS formed in the mid 1990s, is an alliance of Local Government and other Government agencies together with industry that is concerned about the state of the freight transport network across south eastern Australia, including Victoria, ACT and New South Wales. The organisation meets quarterly, has a paid secretariat and evaluates projects across all forms of transport that its membership has prioritised as worthy of Government and operator support.

Some projects have commenced either in a planning or construction phase. Some projects extend into New South Wales as well as the ACT. It is pointed out that much of the freight concerned is not destined for metropolitan markets but from manufacturing node to manufacturing node or to port facilities for export.

## Preamble

Freight productivity is determined by a number of variables and the inter-relationship of these factors is critical in decision making by industry to move freight around this nation.

Investment by industry in different heavy vehicle (HV) configurations, the load classification of various roads, the introduction of additional urban and industrial developments, the time of day, temporary or long term maintenance programs all play a part in the freight productivity equation as do speed limits.

## Context

The SEATS region consists of several regional production areas. The Illawarra-Shoalhaven is industrialised with steel manufacture, production of chemicals and nutraceuticals, food products, building products, the NSW southern tablelands has strong agricultural production, quarry supplies and timber processing. Out of Victoria's Gippsland comes a range of agricultural produce, predominantly horticulture, requiring key freight and transport connections into both Sydney and Melbourne.

The region has significant quantities of inbound and outbound freight, with freight travelling through Port Melbourne, Port Eden and Port Kembla dominating national export movement out of the region. The movement of freight to and from the region relies on existing road and rail networks. Key freight corridors that enable the movement of freight into and out of Gippsland include the Princes

Highway and Monaro Highway corridors and the Bass Highway/South Gippsland Highway corridor as well as the Gippsland rail line.

The continuous improvement of the Princes Highway corridor in recent years is of vital interest to SEATS as it contributes to the integrated approach that governments are taking across the transport network to better link ports with key freight precincts as well as key domestic distribution centres. The goal is to help create sustainable communities by providing a reliable and safe road network to access high value employment and social amenity.

## The Proposal

SEATS recognises that a safer transport environment delivers benefit to all sectors of the community.

However the ideals of “Vision Zero” to be attained cannot deliver an outcome that freight delivery times and costs are affected that reduce regional production and employment.

SEATS recognises that this analysis is seeking feedback on a proposed reduction of the speed limit on roads outside of built-up areas where there are no sign-posted speed limits to help improve safety.

As pointed out in the background information, the risk of being killed on a regional or remote road is 11 times higher compared to a road in a major city. The Australian Governments are looking to amend the Australian Road Rules to address this issue.

Some roads outside of built-up areas, especially in regional and remote areas, may not be safe to travel on at 100km/h. Many of Australia's regional and remote roads are not sealed, and may be dirt or gravel tracks. Other roads may have sealed surfaces, but may be in poor condition, or lacking the road features that would enable safe travel at high speeds.

Travelling at up to 100km/h on roads such as these may not be safe and will increase the risk of crashes, death and serious injuries. Reducing travel speed on these roads can help prevent the tragedy of road crashes, injuries and deaths, by setting a speed limit that is safe for drivers and people using the road.

This impact analysis considers the options, costs and benefits for lowering the current default speed limit in the Australian Road Rules, and introducing a new default speed limit specifically for unsealed roads.

This call for submissions is to seek feedback from industry, interested stakeholders and members of the public on:

- The options for lowering the current default speed limit outside of built-up areas.
- Introducing a default speed limit for unsealed roads outside of built-up areas.

- The potential road safety benefits of reducing default speed limits outside of built-up areas.

SEATS is wishing to make input into the review and feels that its position across south eastern Australia places it with this helicopter view of the freight logistic chains.

## SEATS Contribution

SEATS applauds the fact that Australian Governments are seeking to move towards the “Vision Zero” system

When we talk about a ‘system’ that does not kill or seriously injure, it is not just about the road network. Road transport is a complex system in which people, vehicles and road infrastructure interact. A Safe System approach ensures they interact in a way that creates a high level of safety, by anticipating and accommodating human errors.

Safe System means looking as broadly as possible at all the elements that influence crashes:

- ROADS AND ROADSIDES
- VEHICLES AND VEHICLE MIX
- ROAD USERS
- SPEED
- FUNCTION OF THE ROAD
- PLANNING

It means looking at how these elements interact and can work together to protect all road users. In taking a system approach it also commits to the proactive improvement of roads and vehicles so the entire system is made safe, rather than just locations or situations where crashes last occurred.

In all crashes, speed is a key element that determines the forces that injure people. Speed management is key to improving the interaction of all three parts of the road transport system. Speed, whether it is driving at a speed inappropriate for the prevailing conditions or driving at a speed over the limit, contributes to the risk of crashes and their severity. Even if the speed of the vehicle was within the posted speed limit and not considered the cause of a crash, the kinetic energy transfer impacts the severity of the injury.

Freight, being carried by the different forms of transport, causes the use of the vehicle and the driver performance to be optimum to the conditions that creates a logistics chain that is both productive and efficient.

Regulations on the driver's performance hours exist in all jurisdictions and have been honed over the years to be a balance between delivery schedules and the human performance of the driver. Industry, planning for the ideal world, make decision for deliveries to meet existing conditions and driver allowances and abilities.

It is here that SEATS wishes to impress that any reduction in speed limits that affect freight delivery times needs to be considered against the equation of driving the distance with the same number of driver hours to undertake the task. In past and current situations a temporary speed reduction/road closure at certain times of the day were posing limitations on HVs being able to travel from East Gippsland into Melbourne and return with a single driver when two or more roadwork closure works were happening.

Another situation in NSW exists where certain roadworks are causing the freight operator to have two-up drivers or recruitment of a casual driver for part of the journey, where previously a single driver could do the job in a B-double.

It is appreciated that these examples are not related to speed zones and limitations but the same principles apply. Reduce the speed limit by 20kph for a collective 100km of a freight task should increase the driving time by between 15 and 40 min depending on the original speed. But when you multiply this by 2 for the return trip, it can be seen where a driver can be running out of hours at the end of a shift/task allocation.

## Concluding Comments for submissions:

SEATS supports moving towards "Future Zero"

Freight productivity logistics is a balance between HV configuration, driver hours and distance. Changes in speed limits can significantly affect the capability available to industry to move freight. Assurances need to be advocated to industries that other freight network improvements will allow the same outcome to be delivered.

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