

9 March 2017

Attention: Who moves what where
National Transport Commission
Level 15/628 Bourke Street
Melbourne VIC 3000
Lodged online via: www.ntc.gov.au

Dear Ms O'Brien,

Thank you for the opportunity to provide feedback on the National Transport Commission (NTC) Discussion Paper *Who moves what where: Better informing transport planning for Australians*. We applaud this consultation process in the effort to improve transport planning.

The Amy Gillett Foundation has a direct interest in contributing to the conversation about transport planning, particularly regarding interactions with cyclists, and maximising safety outcomes.

The most important and overarching concern related to the Discussion Paper is that the safety performance of the transport sector is largely overlooked, and that there is little to no reference to cyclists in the planning context. Our focus is on the safety performance of the road network, with specific reference to cyclists as a vulnerable road user.

Planning is fundamental to creating a safe road network and it is essential that planning is conducted in context with an accurate representation of current road use. A primary context of freight and transport planning in Australia is a road network that is being used by all modes including cyclists. A road transport network built to the highest Safe System principles, must begin with all road users being included in the planning process.

In this submission, we have provided details of this main concern and responses to the recommendations from the Discussion Paper.

We look forward to the next steps in relation to transport planning. Please do not hesitate to contact me directly if you have any questions or require any additional information.

Yours sincerely



Phoebe Dunn
Chief Executive Officer

Amy Gillett Foundation

The Amy Gillett Foundation (AGF) is a national organisation with a mission to reduce the incidence of serious injury and death of bicycle riders in Australia. We draw on evidence and international best practice, and collaborate with governments, business and the community to create a safer environment for cyclists, while maintaining an efficient road network for all road users.

Discussion Paper – transport planning must consider all road users including cyclists

The lack of inclusion of cyclists and pedestrians in the planning process described in the Discussion Paper is a critical and glaring omission. The planning process should include data collection, sharing and analysis.

The Amy Gillett Foundation can contribute to filling this gap in collaboration with NTC and other key national cycling organisations including Cycling Australia, and the Cycling Promotion Fund.

The most important and overarching concern we identify about this Discussion Paper is the lack of focus on safety, especially of vulnerable road users. To create a safe and efficient transport network it is essential that all modes are meaningfully included in the planning of the network.

Walking and cycling are transport options that are fundamental components of the transport sector in Australia. Both are important for healthy, active communities and both contribute to the Australian economy, the liveability of our cities and regions and efficiency of our road network by reducing vehicle congestion. Yet the lack of consideration for the safety of cyclists as a key road user group is alarming.

There are only two cursory mentions of cyclists in the Discussion Paper. First, identified by workshop participants as a ‘potential area’ that might be useful to discuss and second, lumped together with pedestrians in a table about future analyses that in its detail refers almost solely to generating data about pedestrian movements.

Planning is vital to ensure the safety of all road users. **The only way it is possible to create a safe transport network for all road users using the Safe System approach, is to include all road user groups in the planning process.**

While the focus of the *Who moves what where* project is on freight and passenger movement, this activity occurs largely on the road transport network used by all modes.

The proposals for a Transport Satellite Account (TrSA) have merit. However, such an exercise would need to incorporate the costs of trauma associated with the transport sector to provide a true and fair picture of the contribution of transport to the national account.

It is critical that the safety of everyone on the roads, across all modes including cycling and walking, is placed at the forefront of data collection and analysis. This will help to promote a safer transport network. It is also critical that we plan for and encourage a greater shift to a multi-modal transport

network – outcomes of such a shift will have direct outcomes on planning for passenger and freight transport.

A safe transport network for everyone can only be achieved if the context for the planning is accurate. Traffic volumes must include, not just heavy vehicles and passenger vehicles, but also cyclists. Cyclists are riding on roads across Australia, there is a safety imperative to plan for freight and passenger movement that recognises and incorporates cyclists to maximise safety outcomes.

The AGF has expertise in cycling safety education, including working with Australia's biggest trucking company The Toll Group on both face-to-face education of Toll fleet drivers and development of an on-line learning management system on how to share the road safely with cyclists. We are also the only cycling organisation who is a member of the National Road Safety Partnership Program, and have conducted an education webinar for members on sharing the roads with cyclists.

Response to NTC recommendations

With regard to the specific recommendations made in the report, the AGF is supportive of the actions suggested.

Recommendations 1, 2 and 4 – data: sharing and open data

We agree that data sources need to be shared across government and private industry. Again, we stress the need to include all road users in the sharing of data. Nationally there are a few data sources that provide insights into cycling activity, however care is needed in including these data as each have their limitations. The AGF research expertise can provide critical insights into the available data to help avoid the pitfalls created by the limitations of existing data.

In specific reference to Rec 4, we recommend that NTC also consider the sharing of crash data in its remit. Understanding crash rates are important to understanding and evaluating the safety outcomes of planning decisions on the road network. However, currently there is no national consensus on the definitions of non-fatal injury outcomes. This makes tracking and comparing non-fatal crash outcomes nationally extremely difficult and to overcome these difficulties a costly and time consuming process of post-analysis is needed to convert the range of data into a comparable data set.

Recommendation 3: costing and future funding

We urge the NTC to consider any costing or funding allocation to the road network and planning to include:

- All road users, including cyclists
- Weight funding models to recognise the broader social impact of actions both positive (i.e. the liveability of streets, reduce congestion, improve efficiency) and negative (i.e. potential to cause harm)
- Positive provision to support cycling safety infrastructure

Any brief for the ABS to prepare a Transport Satellite Account (TrSA) should ensure that safety and other performance features of the transport sector are captured. This is fundamental to presenting a true and fair picture of sector performance.

Recommendations 5, 6, 7 and 8: data plan, collaboration and future reporting

We support a co-ordinated approach to data collection and dissemination that builds on the lessons from the New Zealand experience. We welcome an opportunity to be part of this process as an industry partner and discussions related to safe cycling as an integrated part of future reports related to transport planning and data.