

The Secretary  
Rural Roads Speed Limits Committee  
Parliament House  
HOBART TAS 7000

Thank you for the opportunity to comment on the rural speed limits proposal.

My main concern with the proposal is that is poorly considered and that apart from being unlikely to achieve the forecast crash trauma outcomes, is actually at risk of undermining effective road safety strategies into the future.

The proposal for the most part ignores the primary safety aspect of crash likelihood, and instead focuses on the notion that if the road safety strategy is unable to significantly reduce the crash rate, it will instead be set to try and reduce the damage that results. In that respect it is an admission of the failure of efforts to date, which incidentally have put an inordinate amount of effort into road rule compliance enforcement rather than active low risk motoring.

In particular the proposal completely lacks a cost / benefit analysis between the variation in crash rates arising from the blanket speed reduction against potential increases in crash rates arising from any increase in inattentiveness that arise as a consequence.

Inattentiveness is already one of the biggest single reported contributing factors in crash incidence. Any move such as this which will reduce the attention requirements of drivers and promote more 'set and forget' approaches to driving could reasonably be expected to increase the role of inattentiveness in crash causality.

### **Road conditions as a determinant of speed limits.**

On dirt roads motorists invariably appear to drive to the conditions within the limit and vehicles sitting constantly on the current 100km limit would appear to be a rare sight. Despite the current limit being higher than that now proposed for sealed roads, the new limits proposal lists an expected reduction in crash rates arising from the 80kph dirt limits that borders on statistical insignificant. If road conditions were such an issue this would not be the case.

I would content that the main reason is that for unsealed roads most drivers set their speed to the conditions rather than the limit. This is a practical example of driving to the conditions within the limit.

Unfortunately, whilst there has been some attention to that notion in public awareness campaigns in recent years the new proposal will destroy any chance of developing such a culture in the motoring population. It locks us into a mindset where the speed limit is the expected travelling speed. Where the speed limit has little validity in the perceptions of road users they will attempt to make the limit their set speed.

The proposal admits as such by now saying that the government is attempting to set the limit at a level where the average driver could expect to use that as their set speed for reasonable periods of a time when travelling.

This is contrary to the notion of treating the limit as a maximum rather than a default. It also weakens attempts to develop low risk 'drive to the situation' behaviour, where motorists vary their speed to suit the current situation.

A better approach would be to put lower limits on short sections of road where relevant hazards such as hidden driveways and blind corners are prevalent, or to introduce more meaningful signage that helps educate as to the spot hazards they might need to low down for.

Other strategies that will be harder to initiate with this proposal are ones where a speed limit for adverse conditions (rain, night etc) is imposed for best case conditions (daylight, dry). In this respect a higher standing limit with reductions for adverse conditions would be more effective, as it would develop a culture of driving to the conditions (eg dual limits of 100kph 7.00 am to 7.00pm, 90 kph at night, or even better, all limits reduce 10kph between 7.00pm and 7.00 am or when roads are wet.

There has also been relatively little effort put into improving the driving capabilities of the motoring population. A large proportion of drivers (most middle aged and over) appear to have little comprehension of the concept of time based following distances, the ability to deal with putting a wheel on unsealed verges is shamefully absent in the urban motorists skill set and once obtained as a teen a drivers license applies for life with no requirement for follow up driver development or testing till advanced old age. Successive governments appear to have lacked the courage to tackle this last aspect, even though market based mechanisms are readily available and nowadays a more common form of policy instrument.

### **Lack of credibility to the proposal process**

When the government originally proposed reducing rural speed limits some years ago they did so with the stated justification that the then system of limits was unduly complex and confusing, and that a blanket lower limit would be simpler. We now have a proposal for 40, 50, 60, 70, 80, 90 and 100 kph urban roads and 80, 90, 100 and 110 kph rural roads.

After reportedly large scale resistance to that proposal the government set up trials in a rural municipality where the likely community resistance would be lower (short inter-township distances and often winding roads where motorists would already be more likely to travel within rather than on the limit) and announced that one of the main proponents of the lower limits (Monash University) would be engaged to evaluate the level of community acceptance. This implies an intent for the trial to be a backdoor mechanism for adoption rather than an evaluation of the proposals effectiveness in reducing road crash trauma.

I offer these comments as a former advanced driving and motorcycle learner and advanced riding instructor and curriculum developer with experience in road safety research, advising government agencies on a number of motorcycle safety issues and extensive experience in facilitating community attitude and behavioural change.

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