



## **COUNCIL ON THE AGEING VICTORIA SUBMISSION:**

### **INQUIRY INTO THE INCREASE IN VICTORIA'S ROAD TOLL AND THE ADEQUACY OF ROAD SAFETY APPROACHES**

**Prepared by  
COTA Victoria**

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**To:**

**The Secretary  
Economy and Infrastructure Committee  
Parliament House, Spring St  
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Via email to: [roadtollinquiry@parliament.vic.gov.au](mailto:roadtollinquiry@parliament.vic.gov.au)

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## 1. ABOUT COTA VICTORIA

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Council on the Ageing (COTA) Victoria is the leading not-for-profit organisation representing the interests and rights of people aged over 50 in Victoria. For 70 years in Victoria, we have led government, corporate and community thinking about the positive aspects of ageing. Today our focus is on promoting opportunities for and protecting the rights of people 50+.

We see an ageing population as a time of opportunities for personal growth, contribution and self-expression. We believe there are obvious National, State, community, family and individual benefits from this approach. We are also focused on the protection of the rights of people aged 50+.

COTA Victoria is a not-for-profit member based organisation run by, for and with Victorians aged 50+. We fund our activities and services through the support of government, members, philanthropic trusts, businesses and the public.

We have an experienced Board, highly qualified, permanent staff located in a central Melbourne office location and a broad State membership. We also have over 130 community volunteers throughout Victoria with skills in training, group facilitation, policy development and advocacy, including volunteers bi-lingual in a number of languages. We work with local government, senior citizen centres, community houses and a broad range of community and service organisations.

COTA Victoria is supported by financial assistance from the Commonwealth and Victorian Governments.

## 2. INTRODUCTION

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Council on the Ageing Victoria (COTA Vic) appreciates this opportunity to make this brief submission to the Inquiry's investigation into the increase in Victoria's road toll and the adequacy of road safety approaches.

### Terms of Reference

Over the past seven years, COTA Victoria has worked with VicRoads, Monash University Accident Research Centre (MUARC), Victorian Equal Opportunity and Human Rights Commission (VEOHRC) and Victoria Walks in responding to issues of road design, pedestrian safety and older drivers.

We note the Inquiry's eight terms of reference and have focused our response to the following areas as they affect Older Victorians:

- (1) Current Victorian Towards Zero Road Safety Strategy 2016-2020 and progress towards its aim of a 20 per cent reduction in fatalities with 200 or less lives lost annually by 2020;

- (2) Adequacy and scope of the current driver drug and alcohol-testing regime;
- (3) Adequacy of current speed enforcement measures and speed management policies.
- (5) Measures to improve the affordability of newer vehicles incorporating driver assist technologies;
- (7) Adequacy of driver training programs and related funding structures such as the L2P program;

**Key statistics on older people:**

- By 2021, the number of people aged over 65 will reach approximately 1.1 million. This projected increase is twice the growth rate of the general Victorian population.<sup>1</sup> As a result, people over 60 years of age are the *fastest growing age group of drivers on the road*.<sup>2</sup>
- People aged 65+ currently represent 14.6% of the population yet account for 39% of pedestrian fatalities.<sup>3</sup>
- With respect to speed limit zones, and consistent with the TAC findings, around 75% of all crashes involving older pedestrians occur in 50 or 60 km/h zones (urban streets).
- Collectively, intersections are the most common crash location, representing 45% of all older pedestrian crashes in Victoria. Most collisions between cars and older pedestrians occur at intersections where vehicles are turning.<sup>4</sup>
- Motorists should have given way in at least 42% of crashes involving older pedestrians at non-signalised intersections and 72% of crashes at signalised intersections
- At least 16% of all older pedestrian crashes, and 23% for those aged 85 and older involve vehicles colliding with pedestrians on footpaths, footpath driveways or at entrances to car parks.<sup>5</sup>

### 3. SUMMARY OF RECOMMENDATIONS

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1. Safety design of vehicles must include pedestrian and cyclist safety design features and technology.
2. Pedestrian design standards similar to Japan and Europe on imported vehicles should be set and enforced.
3. The Victorian Government continue work with the Commonwealth and other state governments to support the introduction of acoustic sound-emitting devices in all hybrid and electric vehicles for the protection of pedestrians with hearing and/or vision loss

4. The infrastructure solutions proposed by Victoria Walks (Mantilla & Burt: 2016) to reduce collisions and fatalities between pedestrians, cyclists and motorists be introduced as part of a 'safe system for vulnerable road users'.
5. Investment in infrastructure to enhance walkable communities and safer pedestrian routes surrounding transport hubs and activity centres.
6. Implementation of recommendations made by Victoria's Walks submission to Inquiry into Aspects of Road Safety in Australia (2015) regarding the safety needs of pedestrians and active transport users.
7. Invest in the expansion and affordability of driver awareness programs such as Wiser Driver across Victoria particularly in outer urban and regional locations.
8. Community education and awareness raising is needed to identify at-risk drivers without adversely affecting safe older drivers. Where older people are losing capacity to drive safely, respectful treatment and appropriate testing is required.
9. There should be clearer information for anyone in receipt of medication on driving. This needs to be prominently displayed on medication and in communication between doctors and pharmacists.
10. Invest in a range of safe and accessible transport options to address transport disadvantage and support older people to self-regulate driving according to capacity - rather than need in poorly serviced communities.

## 4. ROAD SAFETY STRATEGY & SPEED MANAGEMENT – TOR (1) & (3)

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### 4.1 SAFER VEHICLES FOR PEDESTRIANS AND CYCLISTS

In responding to the increase in fatalities on Victoria's roads, the Inquiry also needs to consider Victoria's role in ensuring 'safer vehicles'.

Vehicle design directly impacts on the level of injury experienced by pedestrians – particularly older pedestrians. The design of safer vehicles has primarily focused on the protection of motor vehicle occupants. Pedestrian and cyclist safety should be intrinsic in the safety design of vehicles. Reducing the injury risk to pedestrians and cyclists is not only a public health issue but is also a *just and equity issue*. There is a need to recalibrate vehicle safety to become focused on people that are cycling and walking – not just people that are car occupants.<sup>6</sup>

*Safety within a vehicle should never be achieved at the expense of vulnerable road users.<sup>7</sup>*

COTA Victoria strongly recommends pedestrian vehicle safety standards as Japan and Europe have introduced. These include low cost, effective specifications such as restrictions on bull bars and window – tinting.<sup>8</sup> As Australia's car manufacturing industry reduces, the importance of design standards on imported vehicles also needs to be set and enforced.

### **Recommendation 1**

Safety design of vehicles must include pedestrian and cyclist safety design features and technology.

### **Recommendation 2**

Pedestrian design standards similar to Japan and Europe on imported vehicles should be set and enforced.

## **4.2 SAFETY STRATEGIES FOR SILENT VEHICLES**

In recent years, there has been a significant increase in the number of Australians looking to purchase an electric or hybrid vehicle as their next car. The use of hybrid and electrical vehicles is increasing largely due to concerns relating to climate change and fuel scarcity.<sup>9</sup> It is estimated they will make up 90% of the entire vehicle fleet by 2050.<sup>10</sup>

Hybrid and electric vehicles pose a significant threat to pedestrians with reduced hearing and/or vision. Research released by Vision Australia and Monash University's Accident Research Centre in 2018 revealed that 35 per cent of people who are blind or have low vision surveyed had either a collision or near-collision with an electric or hybrid vehicle.<sup>11</sup> A study undertaken by the US National Highway Traffic Administration revealed that hybrid and Electric cars were 37% more likely to hit a pedestrian than traditional motor vehicles. This is because when operating at low speeds, hybrid and electric vehicles do not emit any engine noise and emit very little tyre or wind noise. This can make them far more difficult for pedestrians to detect.<sup>12</sup>

Vision and hearing loss are predominantly age-related conditions and are therefore common amongst older people.<sup>13</sup> Around 9.4% of Australians aged 55 and over have a vision impairment. One in three people over the age of 50 and one in two people over the age of 65 experience hearing loss.<sup>14</sup>

In 2019, the United States and Europe adopted UN regulation 138, which mandated the inclusion of an acoustic sound-emitting device in all hybrid and electric vehicles registered in each region.<sup>15</sup> We note the Victorian Government met with other state and federal transport ministers in August 2019, where it was proposed that all hybrid and electric vehicles be fitted with an Acoustic Alerting System to enhance pedestrian safety. We understand that the Federal Government is currently developing a regulatory impact statement on introducing an Acoustic Alerting System, which will be available early this

year.<sup>16</sup> However, it is unclear whether existing vehicles will be required to be retrofitted with a sound emitting device.

### Recommendation 3

The Victorian Government continue work with the Commonwealth and other state governments to support the introduction of acoustic sound-emitting devices in all hybrid and electric vehicles for the protection of pedestrians with hearing and/or vision loss.

## 4.3 ROAD SAFETY PRIORITIES

COTA Victoria is seriously concerned with the safety of older Victorians that use 'active travel'. We know more than 400 pedestrians have lost their lives on Victorian roads in the last ten years, with one-third of pedestrians who lost their lives aged 70 years or over. The recent high fatality figures for both walkers and bike riders requires action on a number of fronts. Our ageing population should be a major consideration in determining road safety priorities and investment decisions. COTA Victoria believes it is time to take a public health approach to planning for future trends.

Walking for transport and recreation is the most accessible and important physical activity for most Victorians, regardless of socio-economic status and age. A more walkable environment fosters social connection, local involvement and access to services.

*For people aged 75 years and over, walking for fitness and transport comprises 77% of the total time spent on physical activity (ABS 2013), and as senior Australians (60 years and over) age, an increasing proportion of their total physical activity comes from walking for transport.*<sup>17</sup>

Investing in walkable communities and a range of transport options would support the self-regulation that older people take in determining their capacity to drive. Whilst the benefits of active travel are well known, these benefits are compromised with high injury rates and the perception of walking or cycling being too dangerous.<sup>18</sup> For women in particular, safety has become a barrier.<sup>19</sup>

Where pedestrians and cyclists interact with motorists, a 'Safe System for vulnerable road users' requires vehicle speeds be reduced to 30 km/h. In higher speed traffic, a 'Safe System' requires vehicles, cyclists and pedestrians to be separated.<sup>20</sup>

COTA Victoria therefore supports the following **infrastructure solutions** proposed by Victoria Walks<sup>21</sup>:

1. Separation of pedestrians and cyclists from traffic
2. Reduction in vehicle speeds
3. Reduction in the complexity of crossing the road
4. Reduction in crossing distance



5. Increased time to cross roads
6. Increase visibility of pedestrians
7. Reinforce the requirement for vehicles to give way
8. Quality surfaces and detailed design

#### **Recommendation 4**

The infrastructure solutions proposed by Victoria Walks ([Mantilla & Burt: 2016](#)) to reduce collisions and fatalities between pedestrians, cyclists and motorists be introduced as part of a 'safe system for vulnerable road users'.

#### **Recommendation 5**

Investment in infrastructure to enhance walkable communities and safer pedestrian routes surrounding transport hubs and activity centres.<sup>22</sup>

### **4.4 LOCATION OF FATALITIES**

Pedestrian deaths occur mostly in urban areas on high trafficked local and arterial roads.<sup>23</sup> The speed limit of 50 – 80 km/h in urban areas requires lowering if we are to reduce the speed limit in line with international best practice.<sup>24</sup>

### **4.5 ROAD RULES**

There are confusing give way road rules between cars and pedestrians which may be contributing to the high rate of collisions between pedestrians and vehicles turning.<sup>25</sup> According to Victoria Walks (2015) when a driver is turning into a road that a pedestrian is crossing, the driver is required to give way. However, if a pedestrian is crossing a street in front of an intersection, drivers are not required to give way – even if they are required to stop for oncoming traffic.

COTA Victoria supports the following strategies and regulations proposed by Victoria Walks<sup>26</sup>:

- Reducing speed limits and including 30km/h speed limits for particular areas
- Better enforcement of driver behaviour impacting on pedestrians
- Changes to road rules to provide greater priority to pedestrians at intersections and in car parks
- Education campaigns to improve understanding of road rules affecting pedestrians
- The need for a regulatory regime that protects pedestrians' actual and perceived safety on the footpath, in the face of emerging technology such as e-scooters
- Significant and ongoing pedestrian specific road safety funding
- Significant and ongoing cycling road safety funding.

## 4.6 PEDESTRIAN SAFETY AND PERSONAL MOBILITY DEVICES

We note that the National Transport Commission is currently considering options for the safe use of personal mobility devices and has a preferred option (currently) of access to most pedestrian infrastructure, bicycle paths and local roads. As e-scooters can travel over 10km – we strongly urge the development of separate road infrastructure for both bicycle and personal mobility devices.

### Recommendation 6

Implementation of recommendations made by Victoria's Walks [submission to Inquiry into Aspects of Road Safety in Australia \(2015\)](#) regarding the safety needs of pedestrians and active transport users.

## 5. OLDER DRIVERS – TOR (7)

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Victoria's Road Safety Strategy notes: *Drivers over 60 are the fastest growing age group of drivers on the road and this partly explains recent growth in their serious injuries.* As COTA Victoria has noted in many submissions, there is a tendency to consider people between the ages of 60 – 85 as one age group and to generalise people over the age of 60. This relates to the coverage and adequacy of driver training programs and the assumptions regarding capacity attributed to a large, diverse cohort.

### 5.1 OLDER DRIVER EDUCATION

Driver awareness programs by VicRoads and RACV provide a one hour session for older drivers to refresh knowledge on road rules, effects of medication, fitness to drive and road safety tips. The RACV session also provides information on assessing one's own driving ability. Wiser Driver is a comprehensive program developed by the Hawthorn Community Education Centre (now Hawthorn Community House) and an academic from Swinburne University. Run over four successive weeks in two hour long sessions, the course reviews road rules, road safety and vehicle safety. The course also encourages participation and reflection on driving safely in older age and planning for retiring from driving. As it is \$950 course, it is not accessible to many older people.

### Recommendation 7

Invest in the expansion and affordability of driver awareness programs such as Wiser Driver across Victoria particularly in outer urban and regional locations.

## 5.2 MEDIA PORTRAYAL AND AGE STEREOTYPES

The media often portray older drivers as dangerous and a 'problem' to other road users. Mandatory age based assessments are commonly provided as 'solutions' to the 'problem' of older drivers, despite evidence on the need for more sophisticated testing of capabilities that can be applied to all drivers when assessing capacity to drive.<sup>27</sup> Statistics regarding deaths and serious injuries are used to generalise older drivers as 'dangerous', when in fact older drivers are more vulnerable to being injured or killed in a car crash due to frailty. The following headlines are examples of the media linking age and risk<sup>28</sup>:

*'Too many old drivers have a licence to kill'* (Daily Telegraph 4/12/11)

*'Older drivers a road menace'* (Herald Sun 19/8/14)

*'Elderly drivers as dangerous as hoons'* (Canberra Times 4/5/15)

*'Elderly drivers on the nose'* (Herald Sun 9/12/17)

*'Put brakes on old drivers'* (Courier Mail 3/12/17)

COTA Victoria's concern over the focus on older drivers stems from reports by people over 65 years who have experienced unnecessary testing and reviews of their licence due to minor accidents or vexatious reporting. Strategies that perpetuate age stereotypes may result in medical practitioners and licence renewal centres assuming driving capacity is linked to age – not specific physical deterioration or limitations as a result of ageing.<sup>29</sup> The basis for medical testing and licence reviews should always focus on capacity.

### Recommendation 8

Community education and awareness raising is needed to identify at-risk drivers without adversely affecting safe older drivers. Where older people are losing capacity to drive safely, respectful treatment and appropriate testing is required.

## 6. DRUG AND ALCOHOL TESTING (TOR 2)

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### Recommendation 9

#### Driving and pharmacy medications

There should be clearer information for anyone in receipt of medication on driving. This needs to be prominently displayed on medication and in communication between doctors and pharmacists.

## 7. OTHER STRATEGIES TO REDUCE VICTORIA'S ROAD TOLL

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### 7.1 INVESTING IN COMMUNITY TRANSPORT

The number one issue raised by older people in COTA's Listening Post rural consultations conducted in 2018 was the need for flexible, affordable transport options.<sup>30</sup> This includes a coherent policy framework around the role, function and operation of community transport in Victoria.

Many older Victorians cannot access necessary services or maintain social connections as a result of gaps in the provision of supported, community based transport. Limited transport options to access services and supports (particularly in rural and outer urban areas) means people without car access experience additional disadvantage. The lack of accessible buses and distances to bus stops also impacts directly on the health and social needs of frail older persons and commuters with a disability.<sup>31</sup>

#### Recommendation 10

Invest in a range of safe and accessible community transport options to address transport disadvantage and support older people to self-regulate driving according to capacity, rather than need in poorly serviced communities.

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#### End notes

<sup>1</sup> Victorian Department of Health & Human Services (2015) 'Mental health and wellbeing of older people', 10-year mental health plan technical paper

<sup>2</sup> Towards zero 2016- 2020: Victoria's Road Safety Strategy & Action Plan. Accessed 16/01/2020:  
[https://www.towardszero.vic.gov.au/\\_data/assets/pdf\\_file/0010/183556/STU\\_0206\\_RS\\_STRATEGY\\_2016\\_web.pdf](https://www.towardszero.vic.gov.au/_data/assets/pdf_file/0010/183556/STU_0206_RS_STRATEGY_2016_web.pdf)

<sup>3</sup> Mantilla, J. and Burt, D. (2016). Victoria Walks, Melbourne. Version 1.1. August 2016. Case study on Victoria Walks work: Safer Road Design for Older Pedestrians, June 2017 – Accessed:  
[http://www.victoriawalks.org.au/Assets/Files/Final\\_SRDP V1.1\\_low\\_res.pdf](http://www.victoriawalks.org.au/Assets/Files/Final_SRDP V1.1_low_res.pdf)

<sup>4</sup> Mantilla, J. and Burt, D. (2016) P 11

<sup>5</sup> Ibid

<sup>6</sup> INQUIRY INTO ASPECTS OF ROAD SAFETY IN AUSTRALIA Submission by Victoria Walks, March 2015, P8 Accessed 16/01/2020  
<http://www.victoriawalks.org.au/Assets/Files/FINAL%20Victoria%20Walks%20parliamentary%20inquiry%20submission.pdf>

<sup>7</sup> Victoria Walks (2015) P8

<sup>8</sup> Victoria Walks (2015) P9

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- <sup>9</sup> Roy Morgan (2019) 'Rising numbers of Australians looking at Electric and Hybrid vehicles for their next set of wheels', accessed 28 January 2020 <<http://www.roymorgan.com/findings/8089-electric-and-hybrid-vehicle-intenders-june-2019-201908280629>>.
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- <sup>12</sup> KOBAYASHI, K. for USTO (2017) 'Electric cars are 37% more likely to hit a pedestrian', accessed 28 January 2020 <<https://venturebeat.com/2017/04/27/electric-cars-are-37-more-likely-to-hit-a-pedestrian-heres-what-automakers-can-do-about-it/>>.
- <sup>13</sup> Vision Australia (2015) Public policy: 'Ageing and vision loss', P1.
- <sup>14</sup> Connect Hearing (2017) 'Hearing Loss Facts & Figures, Australia + Beyond', accessed 28 January 2020 <<https://www.connecthearing.com.au/blog/facts-figures-hearing-loss-australia/>>.
- <sup>15</sup> The Driven (2019) 'make a noise: Australia to follow Europe and US with safety sounds for electric vehicles' accessed 28 January 2020 <<https://thedriven.io/2019/08/19/avas-electric-vehicles-australia/>>.
- <sup>16</sup> Dowling, HJ. For the Guardian (2019) 'Electric and hybrid cars to no longer get the silent treatment', accessed 28 January 2019 <<https://www.caradvice.com.au/788347/electric-and-hybrid-cars-to-no-longer-get-the-silent-treatment/>>.
- <sup>17</sup> Victoria Walks (2015)
- <sup>18</sup> Victoria Walks (2015) P3
- <sup>19</sup> Bolitho, Ja, Designing a safe system for vulnerable road users in Inner Melbourne: Proceedings of the 2014 Australasian Road Safety Research, Policing & Education Conference 12 – 14 November, Grand Hyatt Melbourne
- <sup>20</sup> Ibid
- <sup>21</sup> For details on solutions please see Mantilla, J. and Burt, D. (2016) P 12  
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- <sup>22</sup> COTA Victoria (2019) Bidding for Older Victorians P5: To be publicly released February 2020 and accessed through <https://www.cotavic.org.au/>
- <sup>23</sup> Victoria Walks (2015) P10
- <sup>24</sup> WHO 2008; WHO 2013; ITF/OECD 2012: cited in Victoria Walks, (2015) P11
- <sup>25</sup> Mantilla, J. and Burt, D. (2016) P9
- <sup>26</sup> Victoria Walks (2015)
- <sup>27</sup> Harkin, J, Charlton, J, and Lindgren, M, [Older Drivers in the News: Killer Headlines v Raising Awareness](#), Journal of the Australasian College of Road Safety – Volume 29, Nov 2018 Accessed on 24/01/2020
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- <sup>29</sup> Victorian Equal Opportunity and Human Rights Commission, VEOHRC (2012), Rights on the road: the experiences of older Victorian drivers
- <sup>30</sup> COTA Victoria (2018) The Voice of Older Rural Victorians: Listening Posts Report. (Unpublished)
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