



Brisbane Central Business District Bicycle User Group

CBD BUG

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The Director
Heavy Vehicle Safety Strategy Project Team
National Heavy Vehicle Regulator
PO Box 492
FORTITUDE VALLEY QLD 4006

Via email to: safety@nhvr.gov.au

Dear Sir or Madam

Submission on *Draft Heavy Vehicle Safety Strategy 2021-2025*

This submission provides the views of the Brisbane Central Business District Bicycle User Group (CBD BUG) on the *Draft Heavy Vehicle Safety Strategy 2021-2025* (the strategy).

As background to this submission, the Brisbane CBD Bicycle User Group (CBD BUG) is a grass roots volunteer organisation of more than 800 members, representing the interests of the very large number of people riding bicycles to, from and within the Brisbane city centre.

We actively seek policy decisions at all levels of government supporting people who want to cycle, and in particular relating to improved infrastructure, end-of-trip facilities, integration of cycling needs with other transport modes and a regulatory environment friendly towards people riding bikes. While the CBD BUG focuses on issues affecting people riding bikes for transport, we also strongly support initiatives enabling people to more often walk and use public transport. CBD BUG members meet monthly to exchange information and ideas, discuss issues of relevance and determine the direction of policies to benefit CBD cyclists.

Brisbane CBD BUG offers the following comments on the draft strategy.

For context on our comments, trucks are overrepresented in Australian road fatality statistics as they comprise about 2% of vehicle registrations but are involved in almost 20% of road fatalities. Because of their large size and mass trucks are especially threatening to vulnerable roads users – pedestrians, cyclists and moto riders. Truck drivers kill cyclists disproportionately. In Brisbane from 2001 to 2018 truck drivers killed almost as many cyclists as did car drivers (9 compared with 11). To this day Brisbane's roads continue to carry many trucks that with their grossly inadequate driver vision and other out-dated features were banned years ago in more progressive jurisdictions overseas due to the danger they pose to other road users,

With regard to the strategy:

- We are disappointed with the strategy's emphasis on "shared responsibility" of "other road users' behaviour around heavy vehicles". Too often this is used to shift blame for crashes and harm onto those most vulnerable.
- The strategy needs to appreciate the extent of the vulnerable road user population more fully – essentially everyone is a pedestrian, and around one third of the population has cycled in the previous year, around one fifth in the last month, while about one in seven have cycled in the previous week. (1) Heavy vehicles represent the previously mentioned very small proportion of the vehicles on the road (2). Targeting the road safety message to the relatively small number of heavy vehicle drivers will produce a much greater "bang for the buck" than attempting to educate the vast bulk of the population, many of whom cycle only occasionally. Overwhelmingly, responsibility for safety of heavy vehicles should rest with those who have the most power to cause harm – their drivers. With great power, should come great responsibility.
- We appreciate that NHVR's strong support of the uptake of new technologies. However, the strategy does not provide a roadmap. For example, simple solutions like side underrun protection are still not mandated on heavy vehicles in the Australian urban environment.
- We note that Transport for London has recently introduced a Direct Vision Standard for heavy vehicles using London's roads recognising the disproportionate impact that heavy vehicles have in crashes involving cyclists and pedestrians. Casual discussions with representatives of Boral indicate they are receptive to changes that level the playing field for operators who want to introduce new vehicles that are inherently safer around pedestrians and cyclists. Other operators should be encouraged in this direction. We call for changes to the heavy vehicle regulations to enable a scheme like Direct Vision Standard to operate in urban areas of Australia. We also note the strategy does not reference the Construction Logistics and Community Safety – Australia (CLOCS-A). This is despite the CLOCS-A Guidance Document being partially funded by the NHVR. We see the omission of CLOCS-A as a major oversight and would expect its inclusion in the final version of the strategy as a means to this logistics industry good practice approach being rolled out nationally.

We look forward to a revised strategy that has more emphasis on protecting vulnerable road users.

Yours faithfully



Paul French
Co-convener
Brisbane CBD BUG
27 April 2021

Cc: Space for Cycling Brisbane
Bicycle Queensland
Queensland Walks