Legal issues *in* motor and traffic accidents

The legislature has limited the recovery of common law damages based on the place and nature of accidents, and on the cost benefit ratio of raising safety standards to prevent accidents. This paper discusses options available to plaintiffs in motor vehicle accident claims, and how the evidential burden can be satisfied by expert evidence showing that acts or omission of the defendant(s) were unreasonable. It also takes into account the effect of the recent abolition of nonfeasance immunity of road authorities (see page 16).

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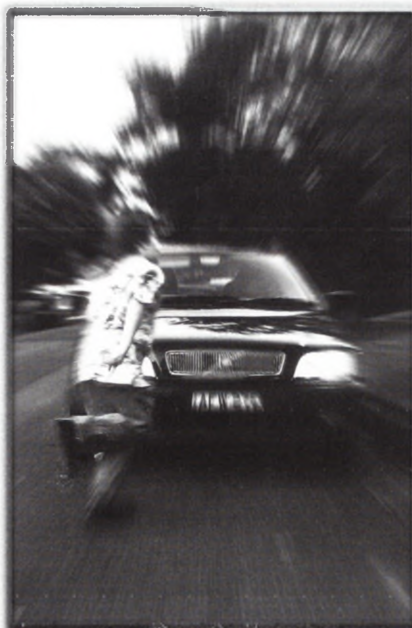

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The *Transport Accident Act* 1986 (Vic) provides widespread no fault recovery of limited benefits to persons who are injured in a transport accident. In exchange for these benefits the legislature has restricted the recovery of common law damages in many instances. Practitioners in Victoria are constrained to represent clients within the limits set by the TAA. A "transport accident" means an incident directly caused by the driving of a motor car or motor vehicle, a railway train or a tram.[1] This definition has been narrowed somewhat restricting the scope of the Act. Previously a transport accident was an incident caused by, or arising out of, the use of a motor car, a railway train or a tram. Common law rights remain unaltered when the incident falls outside the coverage of the Act. Incidents involving motor cars slipping from a hoist at a service station or where the car is stationary with the ignition key not yet being turned on, generally do not fall within the scope of the Act. Practitioners should also note matters specifically exempted from the Act including motor sport accidents and unregistered or uninsured motor vehicles where the accident occurs on private land.[2] Furthermore the Act does not include incidents which occur on bike paths, or slips and falls on footpaths.

"Practitioners should also note matters specifically exempted from the Act"

Section 93 of the Act regulates recourse to common law legal rights. A person who is injured as a result of a transport accident may recover damages in respect of any injuries arising only if the Transport Accident Commission has determined that the degree of impairment of the person is 30% or more and the injury is a serious injury.

> "To qualify [as a serious injury], there must be an impairment or loss of a body function which as the result of the infliction of the injury complained of is both serious and long-term. We think 'long-term' is not an expression likely to give rise to difficulty. To be 'serious' the consequence of the injury must be serious to the particular applicant. Those consequences will relate to pecuniary disadvantage and/or pain and suffering. In forming a judgment as to whether, when regard is had to such consequence, an injury is held to be serious, the question is to be asked: 'Can the injury, when judged by comparison with other cases in the range of possible impairments or losses, fairly be described at least as 'very considerable' and certainly more than 'significant' or 'marked'?"[3]

"Problems may arise in identifying the proper defendant or defendants."

Even when the Commission or a court certifies that the injury is serious, damages are capped at $686,840 plus CPI indexation for pecuniary damage and $305,250 plus CPI for pain and suffering (subject to a floor).[4] Note also that in the event of death the damages are limited to $500,000 plus CPI.[5] Even these caps are difficult to achieve as the result of the adoption of a discount rate of 6% as compared to the 3% discount rate specified by common law.[6]

Choosing the defendant

The standard epidemiology of transport accidents suggests that there are three primary causes of any accident: driver behaviour, the road environment, and the condition of the vehicle. In the great majority of cases, the defendant chosen is the driver of the other vehicle in a two vehicle accident, or an entity which is vicariously liable for the driver's behaviour. The opportunity, especially in one-vehicle incidents, to look to the road environment or to the vehicle or to both may be overlooked.

In considering possible defendants who are responsible for the road environment, the *Transport Act* 1983 (Vic) creates a Roads Corporation.[7] Its functions include the maintaining, upgrading, varying and extending the State's declared road network[8] and in conjunction with municipalities, to assist in the maintenance, upgrading and construction of other roads.[9] Schedule 5 of the *Transport Act*, enabled by s 55, allocates responsibilities between municipalities and the Roads Corporation. The *Local Government Act* 1989 (Vic) contains enabling powers for municipal councils in respect of roads.[10] In addition, the *Forests Act* 1958 (Vic) confers powers upon the Secretary[11] to construct and maintain roads and tracks for the transport of timber forest produce.[12] Furthermore in this era of privatisation, potential defendants include private contractors who undertake the design, construction or maintenance of the road on which the incident occurred, energy providers whose poles may create a roadside hazard which may be a contributing factor in an accident, and transport providers whose bus shelters or other objects may be collided with in a transport accident.

Problems may arise in identifying the proper defendant or defendants. As a result of recent amalgamations, a council may now have responsibilities which it inherited from the former council. The line of division of responsibility may not be clear between the central road authority and the local council or between one of those and a private contractor, which undertakes the work. The guiding principle is, of course, that the entity which could have done something about the condition, is the entity which is the primary defendant.

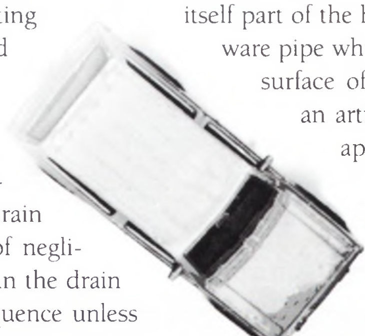
Assistance in making the choice of defendant and finding liability against that defendant is provided by recent changes to the law. The doctrine of nonfeasance is under attack and will be discussed below. The High Court has declared public authorities to be responsible for a failure to act, that is pure omission as well as for misfeasance. The standard for finding a breach of the standard of care has perhaps somewhat fallen in recent times and there are devices for minimising the effect of contributory negligence. Procedural ameliorations which may assist the practitioner include the permissibility of uplift fee agreements[13] and the increased viability of class actions.[14] As the process of road safety audit becomes more widespread, documentation about defects on the road and recommendations for their elimination or improvement will become widely available to claimants' lawyers through the ordinary civil procedure discovery processes and freedom of information.

Nonfeasance

The possibility of suing highway authorities, unlike litigation against other statutory authorities, has to be interpreted against the background of the nonfeasance rule for highway authorities. Although the powers and functions given to highway authorities may be expressed in terms similar to those of other statutory authorities which have been found to coexist with or give rise to a common law duty to take relevant positive action, in the case of highway authorities the existence of

provisions empowering a highway authority to repair and maintain roads must be viewed in the light of the existence of the Australian common law nonfeasance rule. This rule has been interpreted to negate both a general duty to repair and any specific obligation to exercise care in the control and management of the roads even with respect to known dangers. The doctrine of nonfeasance has been the subject of a challenge to the High Court which has reserved judgment. It may be that the High Court will abolish the doctrine.

The doctrine presently may discourage practitioners from even raising actions against highway authorities as it is required to find that the fault of the highway authority is due to misfeasance rather than nonfeasance. Sadly the distinction between the two in many instances is a finely spun distinction indeed. The limits of the doctrine are somewhat hazy as inferior courts, including the Supreme Courts of each of the States and Territories have come to differing conclusions about the applicability of the doctrine. Nonfeasance applies only to local councils and central road authorities acting as a highway authority, and not in the exercise of any other statutory function. For example, it is said that "an authority having a right to place a drain under the road is guilty of negligence for failing to maintain the drain and is liable for its consequence unless the drain is simply part of the road's construction, in which case the nonfeasance rule applies.[15] Where the same body is both a highway authority and a drainage authority, its liabilities in each capacity are quite distinct and the nonfeasance rule applies only to acting qua highway authority. It has been held that there is no nonfeasance immunity for a council that is acting as a traffic authority rather than a highway authority for its negligent omissions.[16] The New South Wales Court of Appeal considered whether the failure of a council to erect an advisory speed sign which led to an accident was covered by the nonfeasance rule



The limits of the doctrine of nonfeasance also manifest themselves in whether only the road itself is covered or whether it extends to any "artificial" appurtenances to the road or the roadside. Where a council had planted trees on the edge of a footpath and subsequently paved it with asphalt, the Full Court of the Supreme Court of New South Wales held that that was misfeasance and not mere nonfeasance because the artificial structure was not itself part of the highway.[17] An earthenware pipe which ran underneath the surface of the road was termed an artificial work which was appurtenant or subservient to a road but not a component part of the road fabric.[18] Similarly, it was pointed that that underground drains, trees and traffic signs were all artificial structures often found in association with a highway but not subject to the application of the nonfeasance doctrine.[19] Finally it was held not to extend to a neglected area of garden in the roadway or to an unfenced or inadequately fenced drop beside the roadway or an area of erosion beside the highway.[20] Cases based upon nonfeasance require a very detailed evidentiary presentation of the authority's past records in order to determine what, if any, positive work the authority has carried out on the defective roadway.[21]

The High Court of Australia is now considering whether to abolish the doctrine of nonfeasance in Australia. Two cases were presented in a consolidated hearing on appeal from the New South Wales Court of Appeal, *Brodie v Singleton Shire Council* (1999) NSW CA 37 and *Ghantous v Hawkesbury City Council* (1999) NSW CA (14 April 1999). The claimant in *Brodie* suffered serious physical injury and the truck he was driving was written off when the wooden bridge that he was crossing collapsed as a result of the condition known as piping. The NSW Court of Appeal held in favour of the council on the basis of nonfeasance in that the piping condition had been caused by wear and tear and erosion and the forces of nature even though the planking on the bridge had been the subject of recent repairs. In *Ghantous* the claimant suffered an injured leg and foot when she stepped down from a narrow footpath into a depression caused

"Cases based upon nonfeasance require a very detailed evidentiary presentation of the authority's past records..."

by erosion. It was held that this was as a result of nonfeasance even though the claimant suggested that the creation of a shopping centre and much greater traffic upon this stretch of the footpath required a reasonable council to act to broaden the footpath or fix the drop into which the claimant fell. Both applicants contend that one of the reasons why the nonfeasance rule ought to be abolished is that it has led to uncertainty in the law, capricious decisions and the maintenance of unhelpful fine distinctions.

The judges of the High Court, at the hearing, appeared to be concerned with the economic implications of the abolition of the doctrine and the effect abolition would have upon local councils. Nevertheless let it be assumed that the High Court is likely to follow the direction of other common law jurisdictions and the recommendations of several Australian State Law Reform Commissions and abolish the doctrine of nonfeasance. What would the implication of abolition be?

The High Court in two important recent cases[22] has addressed the issue of statutory authority liability in negligence for omissions or failure to act. The judges have by no means spoken with one voice. A consensus has arisen that a statutory authority can be held liable for failing to exercise a mere statutory power. It is tolerably clear that mere foreseeability of harm is insufficient for a duty of care to arise; something else is needed. The earlier suggestion by Mason CJ in *Sutherland Shire Council v Heyman* that general reliance could be the extra factor was rejected by those judges who considered it. They instead held that where the statutory authority has control and the claimant is vulnerable unless authority acts, and it would be tantamount to irrational not to act, then in those conditions of dependency a duty of care will arise even though the statute creates only a power rather than a duty to act. The South Australian Full Court of the Supreme Court recently applied the High Court's guidance in a road collision decision.[23]

In the absence of the doctrine of nonfeasance practitioners should renew their vigilance to determine whether the road environment contributed to the accident and whether the responsible highway authority failed to act reasonably in the design, construction or maintenance of the road. The variety of situations in which the road environment could contribute should be almost infinite. The classical instances are of potholes or of aggregate washed on to the surface as a result of rain or drainage problems. There may well be issues as to the surface of the road, its camber, the drains at the side, rocks not removed from the sides of roads and trees allowed to grow or not cut down. Issues may arise as to whether signposting should have been in place, or if signposting was used whether it was of sufficient prominence and sufficiently legible.[24] It will also include issues over whether there should have been the creation of a new road, a major upgrading of existing roads, the sealing of unsealed roads and road verges, the widening of footpaths and the rebuilding of bridges. The latest safety developments may well be the subject of litigation if they could have avoided or lessened the severity of an accident.[25]

The abolition of the doctrine will not mean open season upon local councils and Vicroads. There may be instances in which no duty of care is owed. The immunity created for governmental policy as compared to operational decisions, though criticised, continues to be preserved. As recently as 1998 McHugh J in *Pyranees Shire Council* referred to strong political, moral and economic arguments to justify the approach of the common law in giving significant immunity from liability for omissions.[26] On the whole, however, the battle ground will move from the duty of care to the reasonableness of governmental action or inaction. In great part this will be dictated by questions of cost and budgeting. If a council's actions are reasonable, having regard to financial constraints, policy and like considerations such as planning or staffing levels, then there will still be no liability to an injured motorist. Councils will now, more than ever before, have to engage in responsible record-keeping in order to demonstrate their budgetary constraints and their prioritisation of needs. ▶

"In the absence of the doctrine of nonfeasance practitioners should renew their vigilance to determine whether the road environment contributed to the accident..."

Nonfeasance immunity of road authorities

Brodie v Singleton Shire Council; Ghantous v Hawkesbury City Council

[2001] HCA 29 (31 May 2001)

By a four - three majority, the High Court has abolished the non-feasance immunity of road authorities.

The majority found the defence to be illogical and that even its exponents were unable to identify the way in which it was applied with any precision.

Of the two plaintiffs, Brodie succeeded and the matter was remitted for further findings in the NSW Court of Appeal. Brodie would have succeeded in any event because the conduct of the road authority amounted to misfeasance.

In Ghantous the plaintiff failed on the facts to establish that it was reasonable for the Council to have taken steps to obviate the danger.

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Vehicle design and use

Other potential defendants, in addition to drivers and highway authorities, are the manufacturers, designers, and repairers of motor vehicles. Though it is suggested that the condition or design of an automobile is a factor in only 6% of casualty accidents, this is a sufficiently high factor to consider. There will be no duty of care problems; it will be necessary only to prove that the chosen defendant acted unreasonably in the design, construction or repair of the particular vehicle. Other potential defendants could include the employer or owners of fleets such as trucks, taxis and buses which are supplied with less than reasonable safety equipment by the defendant. When airbags and seatbelts are available as an option to be fitted, it may be that a fleet owner who chooses not to so equip the vehicle could have contributed to the accident or the severity of the injuries received by the occupants of the vehicle.

A class action has been brought against the manufacturer of Kenworth Trucks in the Federal Court of Australia relying upon Part IVA.[27] It is claimed that the trucks were not reasonably fit or fit for all the purposes for which they were intended, in that there was defective design and/or construction of the chassis. No physical injury is claimed yet as a result of the alleged defects.

Expert evidence

Given the emphasis is moving from the duty of care to the standard of care, a careful assembling of expert evidence will be necessary in order to discharge the burden of proof that the defendant fell below the standard of care. The evidence will have to show according to the calculus of negligence, that the likelihood and gravity of harm was greater than the costs of preventing the harm. Experts will be needed to show that the design, construction or maintenance of the road or of the vehicle in question was faulty. The defendant, in general, will rely upon the cost of preventive action being too great or of a lesser priority. Relevant matters include the frequency with which the roads are used; who uses them, whether they are used exclusively by ratepayers or by others. Councils will have to show competing calls upon their resources and the relevant time frame in order to establish the reasonableness of their conduct. With regard to road maintenance, the costs of repair of a project will be compared to another and its cost benefit ratio, rather than by comparing item against item within a particular project. The burden falls upon the road authority to present, in each individual case, the means of funding and the programming priority within the budgetary period. Evidence must be presented regarding the highway standard or vehicle standard which was applicable at the time of design, construction or manufacture. Even though standards and industry practice are only evidence of reasonableness, the presentation of the applicable standard produces at least a prima facie evidence of reasonableness or the lack thereof. "The mere fact that a defendant follows common practice does not necessarily show that he is not negligent, though the general practice of prudent men is an important evidentiary fact. A common practice may be shown by evidence to be itself negligent".[28] "[A] finding of want of due care can properly be made even though the defendant has obeyed all statutory requirements and followed a common or universal practice".[29]

An example of the importance that a careful consideration of costs and

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prioritisation can make can be seen from a recent New South Wales case, *Lettice v Council of the Shire of Musswelbrook.*[30] The claimant in the case suffered serious permanent spinal injuries as a result of falling over the railing of a bridge when he, as a pedestrian, had the sudden urge to vomit. It was argued on the claimant's behalf that the height and width of the rail was inadequate to prevent him from overbalancing, losing his grip, and falling to the creek surface below. There was extensive discussion regarding the relevant standard and whether the standard indicated only a minimum level of height or whether the standard indicated proper height. The discussion focussed on the 1970 NAASRA standard of 1065 mm in place when the bridge was constructed compared to the Austroads standard of 1992 or the standard contained in the Building Code of Australia which prescribed a 1.2m minimum drop hazard for public entertainment areas where alcohol is served.

The other evidentiary battle was over the cost of placing a higher railing that would have prevented the fall or at least impeded the fall of the claimant. It was clear that the experts had done little homework on this matter. Within the transcript one finds the following guesstimates proffered: "a few hundred dollars" (Simpson), "$1200" (Fozzard), "some thousands of dollars" (Brown), "$100,000 including the scaffolding construction" (Prof. Irvine). On one side of the calculus of negligence is the issue of the use of the bridge, the volume of pedestrian traffic, the degree to which users of the bridge are foreseeably affected by alcohol; the height and width of the rail and the height of the drop to the creek surface below. On the other side of the equation is the cost of preventing such an incident and the priorities that the council may have which would return a greater cost benefit ratio. The judge in the case found negligence on the part of the council for failing to provide a higher bridge railing.

The second matter on which careful expert evidence must be assembled is to determine the level, if any, of contributory negligence on the part of the plaintiff. Damages recoverable are reduced to such extent as the court thinks just and equitable having regard to the claimant's share and the responsibility for the damage.[31] The task here for the practitioner is to compare the degree of departure from the standard of care of the reasonable person of both the plaintiff and the defendant. Evidence must be assembled to show the continuing nature of the negligence of the road authority or of the person responsible for the vehicle compared to the venial, temporary negligence or mere inadvertence of the plaintiff. It is helpful to show that the negligence of the plaintiff in taking care of his or her own safety was born of repetition, or inattention bred of familiarity, preoccupation with the matter in hand and other prevailing conditions.[32] At times an inattention due to familiarity and repetition may not even amount to contributory negligence. Mere negligence for one's own safety on the part of a claimant will not disentitle the claimant to damages. The prudent authority or prudent manufacturer will guard against the possible negligence of others, when experience shows such

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negligence to be common.[33]

The judges in this area have as their objective two broad headings, corrective justice and distributive justice. In corrective justice the court is concerned with balancing the interests of the plaintiff and the defendant and with correcting the conduct of the tortfeasor. In distributive justice the court may be concerned with allocating losses and recognising the compensatory role of tort law.[34] In both instances the claimant is now in a better position than plaintiffs have been historically. In order to take advantage of the changes in law which benefit the plaintiff, expert evidence will be needed to prove the acts or omissions of the chosen defendant(s) were unreasonable. PL

Footnotes:

1. s 3 *Transport Accident Act* 1986.
2. ss 41, 41A and 41B *Transport Accident Act* 1986.
3. *Humphries v Poljak* [1992] 2 VR 129 per Crockett and Southwell JJ.
4. s 93(7)(a)(i) and (b)(i) *Transport Accident Act* 1986.
5. s 93(9) *Transport Accident Act* 1986.
6. s 93(13) *Transport Accident Act* 1986.
7. s 15 *Transport Act* 1983.
8. s 16(1)(a) *Transport Act* 1983.
9. s 16(1)(b) *Transport Act* 1983.
10. ss 205, 206 *Local Government Act* 1989.
11. Defined as a body corporate, called "Secretary to the Department of Natural Resources and Environment" s 3(1) *Forests Act* 1958; s 6 *Conservation, Forests and Lands Act* 1987 (Vic).
12. s 21(1)(e) *Forests Act* 1958.
13. s 98 *Legal Practice Act* (Vic) 1996.
14. See, e.g. the recently enacted Part IVA of the *Supreme Court Act* 1986 (Vic) based upon Part IVA of the *Federal Court Act* and the revivified O.18 of the Rules of the Supreme Court of Victoria.
15. Latham CJ in *Borough of Bathurst v MacPherson* (1879) 4 App.Cas. 256 at 271.
16. See *Turner v Ku-ring-ai Municipal Council* (1990) 12 MVR 321.
17. *Donaldson v Municipal Council of Sydney* (1924) 24 SR 408
18. See McTiernan J in *Buckle v Bayswater Road Board* (1936) 57 CLR 259 at 300.
19. See *Grafton City Council v Riley Dodds (Australia) Ltd* (1956) 56 SR 53.
20. See *Council of the Municipality of Woollahra v Moody* (1913) 16 CLR 353 and *Flukes v Paddington Municipal Council* (1915) XV SR (NSW) 408.
21. See eg *City of Melbourne v Barnett* [1999] 2 VR 726 at 727-728.
22. *Pyranees Shire Council v Day* (1998) 192 CLR 330 and *Crimmins v SIFC* (1999) 167 ALR 1.
23. *Wade v Australian Railway Historical Society* (13 July 2000). See especially the judgment of Doyle CJ. The injured plaintiff motorcyclist failed to pull up at a level crossing in time to avoid a train. There were warning signs but the plaintiff's vision of the moving train was restricted or impaired by overgrown foliage for which the council was responsible.
24. See eg *Indigo Shire Council v Pritchard* [1999] VSCA 77 (20 May 1999) where despite signposting a cyclist came to grief on the space between the planks of a wooden bridge. The court held that the signposting was inadequate in terms of its size, its closeness to the bridge, and in the meaning to be conveyed to a cyclist.
25. See eg Prof. Claes Tingvall, Director of the Monash University Accident Research Centre, who on the basis of crash testing, believes that all roads carrying traffic at speeds higher than 70 kph should have barriers on each side of the roadway and in the middle of the roadway in Tingvall, C "Barriers Call for High Speed Roads" 3 *Monash News* 10(1) (November 2000).
26. See *Pyranees Shire Council v Day* 192 CLR 330 per McHugh J.
27. See the several phases of *Johnsandi Transport v Paccar Australia Ltd* with decisions on 22 June 1999 and 15 December 1999 by Heerey J.
28. See Latham CJ in *Mercer v Commissioner for Road Transport and Tramways* (1936) 56 CLR 580 at 589.
29. See *Podmore v Aquatours Pty Ltd* (1984) NSWLR 111, 116.
30. [2000] NSW SC 81 (24/2/00) per Dowd J.
31. *Wrongs Act* 1958 (Vic), Part V s 26(1)(i).
32. See eg *Sibley v Kais* (1967) 118 CLR 424 and *McLean v Tedman* (1984) 155 CLR 306.
33. See *Grant v Sun Shipping Co Ltd* [1948] AC 549.
34. See for example Kneebone, S "Crossing the Divide: The Liability of Local Government as an Occupier of Public Land" (Conference paper 11 & 12 August 2000, Sydney).

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