



15 October 2013

The Hon. Duncan Gay, MLC
Minister for Roads and Ports
Level 35, Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Dear Minister

RE: SSROC member Councils feedback regarding Shared Zones implementation

I write to you from the Southern Sydney Regional Organisation of Councils (SSROC) to outline the concerns of our member Councils with the implementation of the Shared Zones Guidelines that were introduced in 2012.

The Shared Zone Guidelines enable the application of shared zones in high traffic volume areas, which benefits many of our member Councils in densely populated urban environments. However, there are areas in which Councils feel the Guidelines, or the implementation of the Guidelines, could be improved and should be subsequently reviewed and strengthened. A summary of these issues follows:

i. Shared Zones in New Developments

The current Guidelines do not provide guidance for the introduction of a Shared Zone in a new 'Greenfield' or 'Brownfield' development site. As the RMS generally require existing traffic data to justify the approval of the Shared Zone, the existing approval process is particularly difficult in this instance, as existing traffic data cannot be provided for a road that is yet to be built.

ii. Preference For Kerb & Gutter Removal

Although preferred, it is not always best practice to remove a kerb and gutter, such as in laneways and alleys where significant drainage and flooding impacts can occur. The Guidelines do provide for Councils to apply to the RMS for special dispensation to retain kerb and guttering, but from the City of Sydney's experience in streets and laneways with very low traffic volumes, for example, this is very difficult to obtain.

Councils request that the Guidelines provide case studies of appropriate kerb and gutter retention, thus providing a range of circumstances under which the RMS may provide special dispensation, and enable more consistent application of the Guidelines.

iii. Shared Zone Signposting

Although it is the role of Councils to develop Shared Zones, it is presently the responsibility of the RMS to signpost them. However Councils are frustrated with the length of time it can take for the RMS to deliver signage, in some cases, months. Until an area is signposted as a Shared Zone the street or laneway will operate as a normal road meaning pedestrians do not have priority on the carriageway.

Lvl 2, Suite 2E, Hurstville House
34 MacMahon Street
Hurstville

PO Box 536
Hurstville NSW 1481

Ph: 9330 6455

Fx: 9330 6456

Email: ssroc@ssroc.nsw.gov.au

Web: www.ssroc.nsw.gov.au

This compromises pedestrian safety, particularly in streets and laneways where footpaths have been removed. This problem would be easily resolved if Councils were granted delegation to install Shared Zone signposting.

iv. Pavement Surface

Threshold treatments at the start and finish of a Shared Zone are essential as they demonstrate to the motorist that the road environment has changed. However, the requirement to continue a pavement treatment for the full length of the Zone is expensive, unnecessary and from a design perspective, lessens the aesthetic quality of the streetscape, particularly for people walking by.

v. Pavement Colour

Under the current Guidelines, the road surface of a Shared Zone is required to be a contrasting colour. The recent requirement from the RMS to preclude the use of black or grey coloured materials within the road surface is not consistent with some existing Shared Zones and existing footpath pavements. Consideration should be given to allow Councils to use materials that are consistent with their existing paving pallet.

Councils believe that the Shared Zone environment can be made significantly different from a normal road by the use of materials and textures without precluding the use of black or grey materials. This requirement is too prescriptive and Councils should be able to select materials on a case-by-case basis.

vi. Inclusivity in Shared Zones

SSROC member Councils note that there is little consideration for pedestrians in Shared Zones, rather the focus is on vehicles and pedestrian safety as a consequence of vehicle management. Consideration of the number of people sharing the zone could improve assessment processes and provide a more holistic assessment of the current road function and environment.

SSROC member Councils would like the Guidelines to provide for greater amenity to pedestrians at all mobility levels. For example, where the effective width of an existing footpath in a proposed shared zone is less than the required minimum (1.2m) under the Australian Standard (AS1428), SSROC recommends that footpaths be retained as they still provide mobility access, enable greater path capacity in peak pedestrian periods and allow room for other road users to move aside when vehicles pass by simultaneously. Furthermore, footpath retention also limits the potential for through traffic to collide with adjoining properties and provides a defined transition area between the travel lane and access points to properties fronting the Shared Zone.

It should also be noted that the need for traffic calming devices like speed humps and speed cushions to control vehicle speed through a Shared Zone are a hazard for pedestrians, particularly those that are wheelchair-bound. These devices are not compliant with AS1428, and in an area where pedestrians have priority, SSROC argues for greater flexibility in the Guidelines for the consideration of traffic calming devices that are also pedestrian friendly – particularly in streets and laneways where horizontal deflection is unachievable.

vii. Alignment with Australian Standards

As with AS1428 above, there are further opportunities for the Guidelines to better integrate with Australian Standards. For example, the requirement for traffic calming in Austroads Guide to Traffic Management refers to AS 1742.13—2009* where the intervals of speed calming devices is 80m to 120m. Aligning the Guidelines to reflect Australian Standards to provide more consistent and effective outcome for the public.

* *Manual of uniform traffic control devices Part 13: Local area traffic management.*

viii. Criteria Flexibility

Under current Guidelines, Shared Zones can be considered on streets and laneways with peak-hour volumes of 100 vehicles or under, and daily volumes of 1,000 vehicles or under. In densely populated inner-Sydney areas, there are many streets and laneways that carry very low traffic volumes (less than 300 vehicles per day) and are primarily used for property access only.

Councils believe they would be able to deliver Shared Zone treatments much quicker and significantly cheaper if there was provision in the Guidelines for Councils to be delegated responsibility for the implementation of Shared Zones on low traffic volume roads, with provision for less extensive pavement treatments and only threshold treatments at the start and finish of the Shared Zone.

The Guidelines should also consider the volume of pedestrians as part of the analysis as this would enable greater understanding of the likely conflict between traffic and pedestrians once the Shared Zone becomes operational.

ix. Continuous Footpath Treatments

Under the current RMS Technical Direction for Continuous Footpath Treatments (TDT 2013/05), these footpath improvements can be considered across streets and laneways with traffic volumes less than 45 vehicles per hour.

Considering continuous footpath treatments are generally included as part of a Shared Zone which allows for traffic volumes of 100 vehicles per hour and under, it would be beneficial to raise the threshold for continuous footpath treatments not associated with Shared Zone to 100 vehicles per hour for consistency considering both treatments aim to improve pedestrian accessibility and enhance local amenity.

x. Greater autonomy for Councils

Prior to the introduction of the Shared Zone Guidelines, Councils were able to introduce Shared Zones in streets and laneways with very low traffic volumes with no changes to kerb and guttering, minimal signage and traffic calming measures at a relatively cheap cost.

The tendency for the Guidelines to be interpreted with little or no flexibility has driven up costs to Councils markedly and reduces the rate at which they can be built. The timeframe for approval by the RMS is also of concern. The uncertainty of when the RMS will complete the assessment process makes it difficult for Councils to schedule construction and inform residents. This can, at times, create lengthy delays and result in frustration for Councils and key stakeholders alike.

SSROC recommends that Councils receive delegation to develop Shared Zones on low traffic volume roads and be able to determine what specific treatments are required and to what extent they are applied.

To this extent, we request code-based self-certification. If the proposed zone fits entirely within the guidelines no further RMS intervention is required beyond Traffic Committee. Where assessment by RMS is required, the introduction of a timeframe would add a level of certainty and allow Councils to schedule construction accordingly.

I thank you for the opportunity to discuss the Shared Zone Guidelines and hope you find these comments useful.

Yours sincerely



Alan Northey
General Manager
Southern Sydney Regional Organisation of Councils