



28 March 2025

Review of the Roads Act 1993 Transport for NSW

By email: roadsactfeedback@transport.nsw.gov.au

To whom it may concern

Review of the Roads Act 1993: Issues Paper

The Southern Sydney Regional Organisation of Councils Inc (SSROC) is an association of twelve local councils in the area south of Sydney Harbour, covering central, inner west, eastern and southern Sydney. SSROC acknowledges the traditional custodians of the land on which we work and live, the peoples of the Darug, Dharawal and Eora Nations.

SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of about 1.8 million, one third of the population of Sydney, including Australia's most densely populated suburbs. SSROC seeks to advocate for the needs of our member councils and bring a regional perspective to the issues raised.

Road Safety and Public Lighting

SSROC strongly recommends that the NSW Roads Act should recognise the vital role of public lighting in road safety

SSROC has been a long-term supporter of the Institute of Public Works Engineering Australia (IPWEA) [Street Lighting and Smart Controls Program](#). The widely consulted and Commonwealth-sponsored [IPWEA Street Lighting and Smart Controls Roadmap \(2016\)](#) concluded that public lighting had a vital role to play in road safety that has been under-recognised in legislation and policy in Australia. Key points from this document of relevance to the current review of the NSW Roads Act Review were that:

- AS/NZS 1158, the road lighting standard used throughout Australia, notes that good quality road lighting can reduce night-time road accident rates by some 30% based on a review of a wide range of international road safety studies (and much of the legacy road lighting in Australia would not meet current standards and is generally at lower levels than international peers);
- The globally recognised *Handbook of Road Safety Measures (Elvik et al)* recognises improved street lighting as having amongst the highest, if not the highest, cost-benefit ratios of all available road safety measures; and
- Research by Clanton & Gibbons in the USA (and others in NZ and elsewhere) has identified that significant reductions in driver reaction times can be achieved from deploying high quality white light as found in LEDs as compared to the yellow low colour rendition lighting of high-pressure sodium lighting which currently dominate some NSW main roads.

SSROC recommends that changes to the NSW Roads Act are adopted that:

1. Mandate Smart Street Lighting Controls Deployment on all State, Regional and Local Roads with Category V lighting

Much of the NSW roads network has or is being converted to LEDs. This is welcome and should be completed in a timely manner. However, the NSW Roads Act should go further and mandate the adoption of smart street lighting controls on all State, Regional and Local Roads with Category V lighting. More than 30 million smart street lighting controls have been deployed worldwide to date because they improve road safety (by continuously monitoring for faults), save energy (by adapting lighting levels to the time of night and road conditions), improve asset management and reduce costs (see discussion in IPWEA SLSC Roadmap).

2. Require a Design Review of Existing Road Lighting on State & Regional Roads

The Act should require that lighting design reviews be undertaken periodically on State & Regional roads to identify legacy gaps in lighting, mismatches in lighting sub-category with current road classification and under/over lighting. The focus of Transport for NSW with regards to lighting has primarily been on new roads and road upgrades. However, it is the existing roads which have both the heaviest usage and the most legacy challenges with their lighting.

3. Reconsider Split Responsibility for Lighting

Put simply, the poorly aligned incentives under the current utility ownership model of public lighting and the arrangements between Transport for NSW, local governments and electricity distributors are hampering both lighting improvements and timely adoption of new technology on NSW main roads.

While Transport for NSW is the primary road authority for State and Regional Roads, it regards local governments as the road authority on these roads for lighting purposes. The result of this is that lights on these roads sit primarily on the account of local governments who pay the bills and are then supported with a subsidy by Transport for NSW (the Traffic Route Lighting Subsidy Scheme).

Meanwhile, it is the three NSW electricity distribution utilities which own the vast bulk of lighting on State and Regional roads yet have no formal responsibility for road safety (nor should they).

This unusual set of arrangements results in very poorly aligned incentives with regards to improving lighting, adopting new lighting technology and giving proper consideration to road safety (as well as maintenance, energy, GHG and light pollution). Consideration should therefore be given to:

- reform of the current system to place control of lighting on State and Regional roads with Transport for NSW where it logically belongs as the peak road authority and primary road safety authority; and
- if lighting is to remain with the NSW electricity distribution utilities, there should be greater incentives to upgrade lighting in a manner that aligns with road safety priorities under the Act. Alternatively, reform could allow for contestable alternatives so that the road authorities can choose their own lighting service providers.

Coordination of Road Works

The current Roads Act includes only limited requirements for Transport for NSW (TfNSW) to be

notified of planned road works. Under Part 6, public authorities must obtain approval for alterations to a road or the construction of a bridge, tunnel or level crossing. Road authorities must notify TfNSW of major road work.

However, many different organisations have reason to conduct road works, including, for example, Sydney Water, Ausgrid and Transgrid, as well as local councils. This has often led to situations where roads are dug up not long after completion of re-sheeting by council, that re-sheeting often long-awaited by the local community. There is clearly an opportunity to address this failing, by requiring under the Act that all roadworks be notified and spatially documented in a commonly accessible map. The [Streets Opening Coordination Council](#) (SOCC) operates a platform known as iWORCS¹ which aims to fulfill this function, and to notify stakeholders where their planned works intersect or overlap, so it is clearly technically feasible. However, there is no obligation on those executing roadworks to notify other stakeholders in the road way.

This lack of coordination is not only frustrating for local residents, it also represents very real costs that might have been avoided had works been coordinated, such as:

- Duplicated effort to dig up the same stretch of road;
- Opportunity costs of missed productivity gains;
- Compromised road asset quality, and reduction in asset life as repaired asphalt will be less durable than an intact road surface.
- Social costs, particularly the inconvenience of traffic disruption and noise due to road works;
- Environmental costs, including unnecessary carbon emissions attributable to avoidable truck movements and asphalt consumption;

There is clearly also a negative public image for stakeholders including both council and TfNSW, as well as the utilities.

SSROC therefore further recommends that the NSW Roads Act be amended with:

4. Requirement to Notify Works

The Roads Act Require all parties to notify and central hub of planned works, and for that information to be made mutually available. Making the various stakeholders aware of each other's planned roadworks would enable them to identify and benefit from any synergies. However, this can only be enabled by requiring the notification of planned works to TfNSW, and for TfNSW to make this information accessible in a central, managed and spatially mapped hub.

Yours sincerely

A handwritten signature in black ink, appearing to read 'H Sloan', is positioned above the printed name.

Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils (SSROC) Inc

¹ SSROC is currently working with member councils to evaluate SOCC membership and the iWORCS platform, and is neither endorsing nor promoting the platform. However, 6 of our member councils are already iWORCS users.