



Nillumbik Pro Active Landowners (PALS)

SUBMISSION TO THE

Inquiry into VicRoads Management of Country Roads

INQUIRY INTO VICROADS MANAGEMENT OF COUNTRY ROADS

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Organisation Name: Nillumbik PALs (Pro Active Landowners)

Level within organisation: Executive

TERMS OF REFERENCE:

1. **The effectiveness of VicRoads in managing country roads.**
2. **The existing funding model and its lack of effectiveness for country Victoria.**
3. **The lack of consultation with regional communities and their subsequent lack of input into prioritising which roads are in dire need of repair.**
4. **The option of dismantling VicRoads and creating a specific Country Roads organisation and separate Metropolitan Roads body.**

BACKGROUND INFORMATION

Nillumbik Pro Active Landowners ("PALs") is a group of approximately 2,000 landowners, residents and ratepayers, the majority of which live in the peri urban and rural parts of the Nillumbik Shire. The group was formed in early 2016 in response to unpopular proposed local planning scheme amendments. It is comprised of well intentioned, not politically aligned landowners from all walks of life, with a diverse range of skill sets and talent. As a result of PALs legal (and electoral) actions, (which influenced the eventual composition of the current Nillumbik Shire Councillor corps), the proposed planning scheme amendments C81 and C101 which inspired the formation of Nillumbik PALs did not make it into law. The group has since been tasked with representing its constituents on a range of issues considered of vital importance to their lives, families, properties and interests.

The issue of relevance to this inquiry is the role of VicRoads and its management of country roads. As an active group of landowners within the Nillumbik Shire, the issues around road management are of significant importance as much of the Shire is located within the rural landscape of Victoria and is regularly and frequently accessed by locals, tourists, day-trippers, cyclists and pass through destination based traffic. It is estimated that Nillumbik Shire contains approximately 1200km's of rural roads which confirms our standing, as affected landowners, to have an input to this Inquiry.

Of particular and current importance to PALs is the VicRoads workplan that has resulted in the construction of extensive and numerous road barriers along both the Kangaroo Ground – Yarra Glen Road and the Kangaroo Ground – St. Andrews Road.

The ARRB Group were instructed by VicRoads to provide an **ANRAM analysis of Three Routes in the North West Metropolitan Melbourne** which was delivered (Draft Version) in July 2016.

The three routes selected were:

1. Eltham – Yarra Glen Road between Kangaroo Ground – St. Andrews Road and Melba Highway.
2. Kangaroo Ground – St. Andrews Road between Eltham – Yarra Glen Road and Heidelberg – Kinglake Road.
3. Bell Street between Alva Grove and Waterdale Road.

There is no rationale given as to the selection of these particular routes and no reasoning as to why the specified routes would include two rural roads and one very busy suburban arterial road.

Australian National Risk Assessment Model (ANRAM)

"The Australian National Risk Assessment Model (ANRAM) helps road agencies identify fatal and serious injury (severe) crash risk across all parts of the road network. ANRAM helps road agencies manage this risk through development of treatment programs aimed at reducing fatal and serious injury crashes. This report documents the development of ANRAM.

The aim of this project was to develop an Australian model which could guide future severe crash risk reduction programs. Such programs would assist in achieving progress towards the Safe System vision.

ANRAM provides a mechanism for the identification, measurement and reporting of severe crash risk across the Australian road network. The severe crash risk estimation is based on road infrastructure, speed, traffic flow, potentially conflicting vehicle movements, and on severe crash history.

The ANRAM system provides road agencies in Australia with a tool to implement a nationally consistent risk-based road assessment program to support the objectives of both SCOTI (Standing Council on Transport and Infrastructure) and the National Road Safety Strategy 2011–20. ANRAM can be used to identify road sections with the highest risk of severe crashes. This will facilitate implementation of treatment programs aimed at reducing fatal and severe injury crashes. This is a progressive approach towards the Safe System vision, in line with the existing practice and limited resources.

Road agencies may use their own approaches to treatment selection. ANRAM does not define this approach; rather it provides a flexible Toolkit that allows jurisdictions to prioritise high-risk road sections and to develop targeted treatment options and programs, which reflect jurisdictions' local conditions and resources (emphasis added). By treating the highest severe crash risk road sections first, road networks will progressively attain performance closer to the Safe System goal.

Local roads and low volume roads in regional areas have had limited access to the traditional road safety funding. The scattered nature of severe crashes made it difficult to reliably identify high-risk sections, and even more difficult to economically evaluate effective treatments. ANRAM's approach to severe crash risk estimation makes it easier to develop and estimate benefits of low-cost targeted treatment programs on these local and low volume regional roads (emphasis added).

The report also provides guidance for implementation of the ANRAM system at a strategic level by jurisdictions. It also includes a section on preparing data, processing results, analysis of high-risk sections and initial evaluation of potential treatment options and programs."

(Summary - Austroads Research Report AP- R451 – 14, published April 2014.)

"The traditional approach to identify crash risk is through crash history. Given that human error may occur at any time on the road network, and that the human tolerance to impact forces may be exceeded on many sections of the network, an additional method is required to take a broader network-level view to identify and treat high risk areas in order to meet the Safe System vision".

"The ANRAM system provides a viable alternative to address the gaps that currently exist in the assessment of severe crash risk and prioritisation of risk reduction road investment. ANRAM incorporates a formal set of rules and protocols which allow these functions to be performed by road safety program managers and road safety funding bodies".

*"One of the principal differences between ANRAM and other current risk-based road assessment methods, such as NetRisk or iRAP, is the way ANRAM approaches fatal and serious injury (FSI) crashes. It **incorporates predictive models** (emphasis added) based on the relationship between traffic flow and severe crashes occurring on the Australian road network. Then it **uses iRAP-based risk algorithms to adjust the predicted FSI crash performance (Predicted FSI crashes)**. (emphasis added). The nationwide approach to the calibration of Predicted FSI crashes ensures that the results are comparable across jurisdictions. **The inclusion of the observed severe crash history in the final risk assessment (ANRAM FSI crashes) provides further confidence that prioritisation of high-risk road sections includes actual safety performance data** (emphasis added)".*

(Austroads Research Report AP- R451 – 14, April 2014.)

The **ANRAM** system was developed from trials across Australia on rural roads totalling 379km, of which 83km were from Victoria.

It is estimated that there are 810,000km of rural roads across Australia and approximately 23,000km within Victoria.

It is estimated that there are approximately 1,200km of rural roads in Nillumbik Shire.

The entire **ANRAM** system applicable nationally is dependent upon an incredibly small proportion of existing rural road networks, totalling just 0.05%. Within Victoria the system applicable represents approximately 0.4% of rural roads.

There appears to be no direct data as to any rural roads sampled within Nillumbik Shire, but given the area of the Shire as a proportion of the State area (0.18%), statistically the length of roads would be approximately 15km.

It is doubtful that any research at all was drawn from rural roads within Nillumbik Shire, but if there was, statistically it would represent just over 1% of its rural roads.

The data tested for the **ANRAM** modelling utilised crash data from **severe road accidents only**.

RELATIONSHIP BETWEEN ROAD SURFACE CHARACTERISTIC AND CRASHES ON VICTORIAN RURAL ROADS by Peter Cairney and Paul Bennett, ARRB Group, Australia.

ABSTRACT This paper reports an analysis of the relationship between road surface characteristics and crashes on undivided two-way roads in the state of Victoria, Australia. Surface condition data from multi-laser profilometer surveys was linked to geometry, traffic and crash data using GIS and the resulting tables analysed to investigate the relationships. The three road surface characteristics were either uncorrelated or showed small enough correlations to disregard possible interactions among the variables. Crash rate was higher for road sections with low macrotexture; a power relationship provided a good fit to the data. Crash rate was also higher for roads where roughness was extreme, with a polynomial relationship providing a good fit to the data. No clear relationship emerged between rutting and crash rate. **An economic analysis suggests that resurfacing sites with macrotexture of 1 mm SPTD or less might produce crash savings which would provide a very good return on the investment** (emphasis added). (23rd ARRB Conference – Research Partnering with Practitioners, Adelaide Australia, 2008)

The above paper suggests a direct, clear and evidential relationship between severe crashes and the quality of road surfaces.

The obvious link is the better the road surface, the less likelihood of severe road crashes.

With reference to the ARRB Report, ***ANRAM analysis of Three Routes in the North West Metropolitan Melbourne***, (dated June 24, 2016), VicRoads provided the parameters for the analysis of the solutions which were then assessed by ARRB for each of three routes.

This suggests that an answer was provided to ARRB and a request for ARRB to develop the applicable question. The solution was a given before the problem had been assessed.

The solution was, essentially, barriers, and the more barriers installed, the better the solution would be.

The option 3 (Bell Street) above is not relevant to the Nillumbik situation and has therefore been omitted from any further reference.

Confirmation of the above process appears to lie with VicRoads having some degree of public consultation in relation to the options 1 and 2 prior to the delivery of the ARRB Report dated June 24, 2016.

All of the public consultation revolved around the installation of barriers as the underlying fundamental means to achieve "safe roads".

The consultation process was conducted with some local input as well as discussions with Nillumbik Shire Council.

The Nillumbik Shire Council (at the time of the initial consultation) were completely dis-engaged from the principles, issues and effects that the road barrier mentality and proposed solutions to "road safety" would create for their own ratepayers, landowners, residents, emergency services particularly the CFA, general road users, roadside maintenance works and wildlife. The council decision at the time was to not get involved as it was a VicRoads responsibility and had nothing to do with the council.

The current Nillumbik Shire Council have a totally opposite view and have been (and still are) very engaged with what occurs in their constituency and what will clearly have long lasting effects on the community. This change of attitude was not recorded or reflected in the VicRoads responses to the public consultation and, regrettably, scant attention or importance has been placed on current council views to date.

Similarly, whilst acknowledging no fault of VicRoads, the community sentiment and involvement has dramatically changed over the intervening period between initial limited public consultation and the present where the local community is now very active and very engaged. The local community now demand real input into any matters that may potentially impact their lives, their property and their requirements for safe, well maintained roads.

The aspects of fire safety in relation to road maintenance, emergency and fire vehicle access are of paramount importance to the local community in Nillumbik.

The preservation of the rural ambience, the country road feel to our rural roads and the sensible preservation of road side vegetation (subject to appropriate fire maintenance regimes) remain at the top of the priorities not only for residents, but also for the myriad of visitors traversing the Shire on a daily basis.

The effectiveness of VicRoads in managing country roads

There are currently many controls related to the management of country roads.

Relevant controls include:

- *Road Management Act 2004*
- *Environment Protection & Biodiversity Conservation Act 1999*
- *Flora & Fauna Guarantee Act 1988 (currently under review)*
- *Victoria's native vegetation management framework*
- *Planning & Environment Act 1987*
(Victorian Planning Provisions (currently under review))
- *Country Fire Authority Act 1958 (currently legislatively uncertain)*
- *Catchment & Land Protection Act 1994*
- *Electrical Safety Act 1988*
- *Victorian Bushfires Royal Commission 2009*
- *Roads Safety Act 1986*

VicRoads has an annual income in excess of \$1.6 billion and employs approximately 2700 people.

By any standard VicRoads is a massive public service corporation. The complexities of our road systems are ever increasing and the ability for a single organisation to cover such a broad array of responsibilities (from freeways, to arterial roads, to rural roads and across the spectrum of suburban applications to rural requirements), appears fraught to provide the necessary delivery of services and duty of care.

Previously the **Country Roads Board** was created to cater for roads outside the main metropolitan areas of our major cities and towns. This worked on a practical level although now with the extensive cross pollination of freeways, highways and major arterial roads between country areas and our cities and major towns, many demarcation disputes and funding / responsibility issues may arise.

It would appear that in today's political and bureaucratic environment there would be little appetite for the re-establishment of a government body to control metropolitan road requirements (what used to be the space of the now demised Melbourne Metropolitan Board of Works, as an example).

Equally however there are significant concerns that VicRoads is able, within the current framework, to place appropriate importance and duty of care to the management of country roads when so much emphasis and money is channelled into major projects in urban areas.

The forgotten usually end up being rural communities and the importance of maintaining their rural roads to enable efficient transport and safe travel is in turn marginalised. On the rare occasion when an effort is apparently initiated, as in our options referred to above to "fix" rural roads in Nillumbik Shire, the effort is flawed, inappropriate, not based in reality and has an overreliance on computer generated modelling.

The VicRoads fixation on computer generated modelling delivering supposedly irrefutable results within a framework of operator entered parameters designed by technicians wishing to achieve particular outcomes via incredibly complex and unexplained sets of formulae remains uncontested, unchallenged and impregnable by outsiders.

There are troubling similarities to the complexities and abstract applications that make up the vegetation offset assessments process in the apparently government sanctioned extortion regime within the Vegetation Clearing Regulations just reviewed by DELWP.

The reliance on office based, officer assessed computer generated solutions seek to replace the real world, actual onsite empirical based interaction with users and communities. This stands as an indictment of centralised bureaucracies.

With reference to the above rural road options in Nillumbik Shire, it was clearly evident to the local community that the effectiveness of VicRoads community consultation was very poor. Local residents met with VicRoads Project Manager and others for these two projects during their construction phase (meeting at Kangaroo Ground Emergency Operations Centre – April 7, 2017) convened at the request of VicRoads in response to the very active on site protests by local residents.

It was at this meeting that the Project Manager admitted that *“VicRoads had dropped the ball in relation to road side management and maintenance”*.

This was an extraordinary admission for a project in excess of \$6 million value that a major component of the overall end strategy had been “forgotten”. This is typical of the ineffectiveness of VicRoads road management process.

Victorians may be better served by maintaining the overarching banner of VicRoads but creating appropriately defined and resourced internal departments to control:

- Major Projects (Freeways)
- Major Arterials
- Rural Roads
- Registration

The lack of effectiveness of VicRoads in managing country roads equates to a lack of personal contact with local communities and due recognition of the role of local communities and councils in relation to the pathway to achieve safe roads.

Clearly there are different requirements for each of the above areas of interest. Rural roads require a personal connection as the very nature of the road type dictates the local nature of the usage.

Inclusion of genuine local input at the outset, both through the local council and the local community, would achieve better community involvement which, in turn, would deliver a well-considered outcome and achieve a broadly supported result.

A well designed and delivered rural road network will merge seamlessly into Major Arterial roads.

Poorly targeted or inefficient allocation of funds, or ill-conceived design parameters will not contribute to effective management of country roads. It will only lead to a waste of taxpayer funds by not delivering real advantages and improvements to road safety.

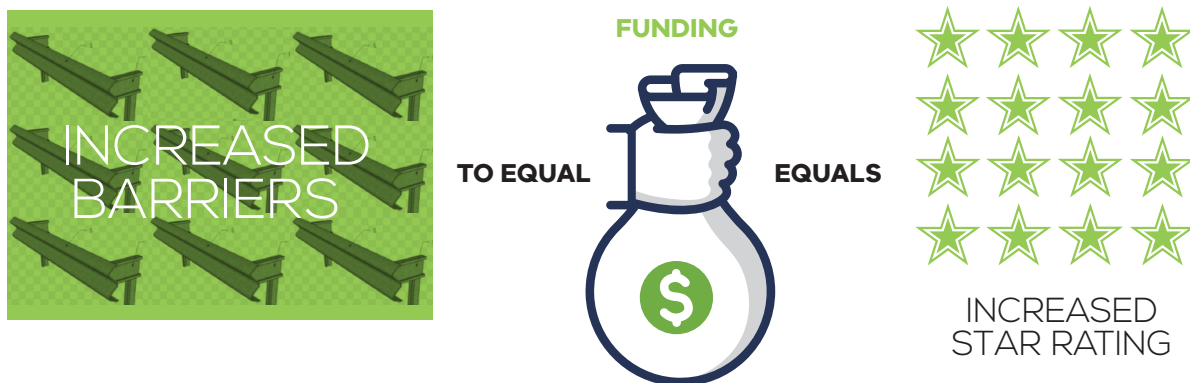
The delivery of a computer generated outcome will be inconsistent with a reality based assessment of design and targeted expenditure.

The existing funding model and its lack of effectiveness for country Victoria

PALs do not have access to the funding model used by VicRoads or the Department of Treasury & Finance in assessing any funding application made by VicRoads.

In relation to the barrier funding for the rural roads options in Nillumbik referred to above, it would appear that the funding model has been used back to front.

All indications are that a figure (quoted by *VicRoads Community Feedback Report – November 2016* to be around the \$6 million mark) was fed into the ANRAM system, reverse applied through the methodology of artificially increasing the length and location of barriers, irrespective of genuine on site needs, until a green light was achieved for its “safety rating” (using AusRAP to achieve suitable star ratings) and the expenditure figure reached.



PALs inspection of installed barriers has identified extensive areas on both the Kangaroo Ground-St. Andrews Road and the Eltham - Yarra Glen Road where, in reality and with practical knowledge of site and road conditions, barriers have been ineffectively and superfluously placed. It can only be assumed that the barriers installed at these locations were done to satisfy the theoretical star rating and not to satisfy any well founded real life road safety issue.

A genuine needs based assessment, done in conjunction with Nillumbik Council and local community representatives, could have delivered not only a better result for locals and our environment, but a more cost effective end result.

PALs suggest that any funding model be based on genuine need consistent with real life on site conditions. An application for funding should relate to the project properly identified and determined on site to deliver appropriate outcomes, not computer generated office based predetermined parameters.

Allocated funding should not drive the works or, in the Nillumbik case, how many barriers are required to meet the funding allocation. The works should dictate the funding.

The lack of consultation with regional communities and their subsequent lack of input into prioritising which roads are in dire need of repair

In addressing this term of reference to the Inquiry, PALS wish to demonstrate the ineffective and deficient consultation processes undertaken by VicRoads by using the two rural road examples within our Nillumbik Shire.

PALS submit that VicRoads appears to be not capable of real consultation with affected communities and local councils, but follows the common path of consultation sufficient to tick the box and release documents sufficient to demonstrate that consultation has taken place. This is routine practice for Government Departments and bodies which have a requirement for community consultation.

PALS believe that the consultation process in relation to the rural roads above was initially fundamentally flawed and more recently virtually ignored. It is acknowledged that some actual community engagement took place and token adjustments were made to the design but there was no case made to the community for the need for the projects in principle, and the vast majority of respondents accepted that there was no possibility of the projects not proceeding, so were only able to provide token feedback.

VicRoads was not prepared to genuinely re-engage with the community as their initial flawed consultation process produced their required result. That result was based on VicRoads making token changes to the original proposal which were inconsequential to the essence of the project scope and length and to the location of barriers.

The current Nillumbik Council attempted to re-engage with VicRoads as the finalisation of the project spanned the change of council following the elections. The current council acknowledged and accepted its responsibility to have meaningful input into the final design. Every attempt by Nillumbik Council was, as we understand, effectively ignored.

In a letter to the Minister for Roads and Safety, the Hon. Luke Donnellan late last year, Councillor Jane Ashton (Sugarloaf Ward) within whose ward the works were being undertaken, provided on behalf of her community, options that VicRoads should consider prior to signing off on the project.

These included:

- *Improve road shoulder for cyclists and other users*
- *Tackle locally known hazard areas, Wattle Glen – KG Road T intersection, Yarra Glen – KG Road T intersection*
- *Improve existing road cambers*
- *Fix existing road surfaces*
- *Introduce turning lanes*
- *Introduce passing lanes for slow vehicles*
- *Only use increased barriers as a last resort and only in areas of critical need.*

These options were presented to VicRoads by Councillor Ashton and were ignored.

The above quoted paper, **RELATIONSHIP BETWEEN ROAD SURFACE CHARACTERISTIC AND CRASHES ON VICTORIAN RURAL ROADS** by Peter Cairney and Paul Bennett, ARRB Group, Australia, concludes that there is a clear and evidential link between improving the quality of the road surface and achieving a very good return on investment in relation to decreasing serious crash statistics.

PALs submit there is an obvious correlation between the quality of the road pavement, the quality and width of the road verges, passing lanes, turning lanes and intersection improvements and the effects on the crash statistics.

As each of the above items are completed and assessed, there are strong indicators suggesting a consequential decrease in the crash statistics.

CRASH STATISTICS

From crash statistics supplied it is evident that there have been no fatal crashes or severe crashes on either the Kangaroo Ground - St. Andrews Road or the Eltham-Yarra Glen Road, around the section from Kangaroo Ground, over the last ten years.

However, the quotations from the ANRAM document above refers to only severe crash histories being applied into the assessments to build confidence in the results.

In the absence of any data at all in relation to the above rural roads in Nillumbik Shire, the adopted models which have resulted in the number, length and frequency of road barriers are not supported by any empirical data as the numbers entered would have been zero for both roads.

Following the commencement of construction of the road barriers last year, local residents voiced their protest by a rally on the roadside at Kangaroo Ground. As a result of this rally, as VicRoads were embarrassed by protesters on site, they requested a community meeting which was held at the Kangaroo Ground Emergency Operations Centre on April 7, 2017.

Councillor Ashton, local landowners and VicRoads representatives attended this meeting specifically to discuss the barriers and their frequency and length.

The VicRoads project director attending the meeting confirmed after persistent questioning that VicRoads had no intention of changing any aspect of the project and that the meeting was just about satisfying their obligation to consult. He further stated that the two rural roads that comprised the immediate project were rated as the **two most dangerous rural roads in Victoria** – a statement that is not only blatantly false and deliberately misleading, it also totally fails the pub test. Neither road has had a road fatality in the last 10 years, whereas there are clearly a great number of rural roads that have had fatal accidents occur over the same period, with many of them recording multiple separate fatal accidents.

From our local perspective, the Kangaroo Ground – Warrandyte Road has a long history of serious accidents but was not even considered as a road requiring the attention ANRAM and VicRoads to deliver their desired safe road rating.

There are countless roads across rural Victoria that would unfortunately make a claim to be Victoria's most dangerous rural road, but there are clearly none in Nillumbik Shire.

We are left to wonder - why the necessity to invent that label? PALs are lead to the conclusion that the project location for funding was predetermined and artificially allocated to these two active, but essentially safe, rural roads.

PALs ask the obvious question: For what purpose? We are unable to answer that question but believe it is a question to which the Inquiry should certainly be demanding an answer from VicRoads.

ANRAM

The information (acknowledged by VicRoads) that was entered into the ANRAM assessment was defective and therefore ineffective in achieving any meaningful outcome.

- The VicRoads ANRAM model was deficient and flawed in that it did not include cyclists and wildlife in the modelling. VicRoads have acknowledged this flaw and are currently pursuing a new version to include both into new models.

It is not sufficient to make this acknowledgement and suggest they will do better next time when both the cyclists use of the roads and the constant likelihood of the appearance of wildlife onto the road pavements both remain such important aspects of delivering "safe roads".

There are approximately 500 cyclists that use these roads each and every weekend. It is an extremely popular cyclist route. Currently both roads have a relatively narrow pavement combined with either narrow or virtually non-existent verges. Combined with poorly maintained road and verge surfaces, the issue of safely passing or overtaking cyclists can be a dangerous exercise.

- A simple onsite inspection of both roads will show that there are some relatively short sections that do require additional road barrier protection, and PALS advocate that this should be done.
- Despite repeated strong representation by local CFA brigades in relation to the problems associated with long uninterrupted sections of road barriers, only token changes were made and none that satisfied the CFA Captains.
- CFA firefighters require regular accessible areas to turn tankers, access roadsides, enter private properties should the need arise away from property entrances, and fight fires along roadsides without impeding tanker traffic along pavements.

As a result of the long lengths of uninterrupted barriers, tankers will need to travel excessive distances in order to turn around, all the while wasting valuable time to extinguish fire, hydrant access could prove difficult when combined with turning capacity or in some cases hydrants being completely isolated from access.

- Uninterrupted lengths of road barriers hamper roadside maintenance, especially where prior to the barriers, vehicle access could be achieved directly to mow or remove vegetation.
- As stated above VicRoads openly acknowledged that they "*dropped the ball in relation to roadside management and maintenance*".

It is not sufficient to just acknowledge this clear deficiency and hope that the issue has no repercussions. This admission included any funding requirements on an ongoing basis to cover costs and overheads. It is a fundamental flaw in the process and even taken in isolation should have been enough to drop the entire project and start again with the new model that VicRoads admitted was underway.

- The ARRB website quotes ANRAM "*is a nationally agreed approach that has built on existing Australian and international risk-based road safety programs such as AusRAP, NetRisk, iRAP and KiwiRAP, to create a system directly relevant and applicable for Australian state and local road agencies. Development of ANRAM was funded by Austroads and guided by Australian road agencies.*"

However, VicRoads acknowledged that ANRAM did not factor cyclists or wildlife into its modelling, an astounding omission for a country like Australia and the very high likelihood of finding both on our rural roads on a regular basis. VicRoads admitted that the model was largely based on European conditions and circumstances.

PALS submit that it is not relevant or appropriate to use European conditions, parameters, assumptions or conclusions in any model supposedly designed for Australian conditions. The circumstances are completely different and the design parameters that are relevant to Australian conditions bear no resemblance to factors influencing European conditions.

- VicRoads acknowledged that there was no allowance for walking tracks or horse trails, both being common activities, particularly on Nillumbik rural roads.
- Barriers have been inexplicably installed on the inside curve of road pavements, seemingly at odds with a vehicles propensity to follow centrifugal forces.
- Similarly, barriers have been installed on both sides of the road pavements along straight sections of roads where there has been no history of any accident, let alone severe accidents.
- Ad hoc apparent protection of trees by the installation of barriers is inconsistent and in many cases unnecessary or redundant.
- Inappropriate tree planting behind barriers but within road reserves is now also occurring, apparently undertaken by VicRoads but without any council or community consultation or any apparent regard for fire safety and the ability of rural roads to offer safe egress for the community in the case of fire.
- Virtually no pavement improvement works have been undertaken and in many instances barriers have been placed along both sides of the pavement, but the potholes remain within the pavement – which is considered counter to common sense.
- Road verges remain totally inadequate along significant lengths of both roads. Whilst some verge works were undertaken the extent of those works fall well short of providing “safe roads”.

PALs submit that there is a very serious concern that VicRoads is not capable of correctly prioritizing which roads should be addressed and actioned for improvement and/or repair.

The apparent arbitrary selection of these rural roads in Nillumbik Shire for such concentrated attention has never been justified or explained.

The local example within Nillumbik Shire relating to the two rural roads, VicRoads has fundamentally failed to properly assess that the Kangaroo Ground - St. Andrews Road and the Eltham-Yarra Glen Road are both of very low priority for action. In contrast and still within our local area, the entire length of the Kangaroo Ground – Warrandyte Road as well as the entire length of the Research – Warrandyte Road feature prominently in accident statistics and have recorded several severe accidents over the last 10 years.

So it is difficult to comprehend why there has been no action on the obvious, but obsessive preoccupation with fixing two rural roads that do not need fixing, at least not with the saturation of roadside barriers inappropriately determined.

Conversely, local rural roads Cherrytree Road and the Hurstbridge – St. Andrews Road have both been retrofitted with excessive barriers but with no supporting evidence that the barriers responded to any accident data that justified their installation.

PALs submit that VicRoads, particularly in relation to rural roads, should first deliver sound and safe road pavements, followed by solid well compacted and wide road verges. These two items alone would deliver genuine improvements to road safety. It is recognized that roadside barriers can play an important role in delivering safe roads, but we submit that it should be used as a safety tool sparingly and always in conjunction with the above pavement and verge actions.

Freeways and major arterial roads and highways should be assessed on different criteria to the assessment of rural roads. There appears to be no differentiation in the models between the road hierarchies.

Even within freeway reserves there is now a saturation of road barriers. Whilst these road barriers are constructed in partnership with wide sealed verges, which is entirely appropriate, there remains very significant concerns in relation to the uninterrupted lengths of central road barriers constructed along the freeway medians. These are often kilometres in length and present emergency services / fire services with significant issues and problems related to turning points being too distant from the emergency areas that need to be quickly accessed, be it for accident or fire purposes.

There appears to be no reason or justification as to why the uninterrupted lengths of barriers are so long.

PALs submit that VicRoads does not properly consult with regional communities and is failing in its core duties to properly prioritise which roads are in dire need of repair.

PALs submit that rural roads should to be assessed on a set of genuine needs based criteria that are open, transparent and completed in close consultation with the relevant affected local councils. Identification of roads that require action should also be assessed in real life and on site with proper reference to potentially dangerous or accident related information. Computer modeling has a legitimate role in delivering safe roads but should not be used to define the extents of the works or as a barometer to the amount of funding.

Local knowledge and practical consultation with councils and locals should provide the overriding controls for works.

Funding allocation should follow assessment not control or define the extent of works.

The option of dismantling VicRoads and creating a specific Country Roads organization and separate Metropolitan Roads body

The consideration of this option is to revert to the original model of the Country Roads Board (CRB) set up to take responsibility for all rural roads. The CRB controlled all declared rural roads including freeways, highways and declared country roads.

There is merit in this approach as it properly focused the attention and responsibilities in relation to all rural roads onto and within the scope of a single focused organisation.

There remains, however, complexities and demarcation issues in relation to the areas between rural and metropolitan classification.

In the past these issues occurred in relation to the common areas where responsibility was unclear between the CRB and the Melbourne and Metropolitan Board of Works (MMBW).

There is also the question on the appropriateness of turning a large single government corporation into two, possibly competing, government behemoths.

In relation to the peri urban areas surrounding the Metropolitan area, there are significant flow on effects where a road decision taken within a metropolitan context may have significant effects on what may be classified as rural roads within a peri urban context.

An example of this may be the North East Link which, it is presumed, would be constructed (assuming the announced alignment is the option eventually constructed) within a metropolitan context. However, the broader impacts and traffic implications, as well as the funding, are directly affected by works that would be need to be completed in the peri urban areas that would directly feed, or not feed, traffic flows into the metropolitan freeway ring road system. These works would be done, presumably, within a rural context.

PALs submit, on balance, there is a strong case for the creation of a separate Country Roads organisation to focus on country and rural roads. The process to develop and assess a business case in relation to separate country roads and metropolitan roads organisations is worth pursuing.

If further detail and/or information is required or considered to be of assistance to the Inquiry, PALS would be delighted to be of some further assistance.

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Damian Crock

Chair

Nillumbik Pro Active Landowners (PALs)

January 15, 2017