August 2025

[redacted]

Re: Speed Limit changes along Barrenjoey Road

I hope the review is going well and particularly in reference to Newport Hill (Beaconsfield to current 50km/hr zone) for which I have the strongest opposition, supported by the NSW Technical Direction and Austroad Standards. Following our briefing and review of these standards, together with consultation with my community, I believe it should remain 60km/hr.

Thank you for agreeing to review, critically analyse, and provide justification for the speed limit decisions. I have not yet received this justification, or the data presented during our meeting (e.g. crash data map, geometric road findings for bends, etc.). Please provide an indication of when this will be available. My community, and I as the local MP, require the transparency referenced in **8.4.1 of** the NSW Technical Direction.

Since our meeting, I have reviewed the Standard and the AustRoads Guides - particularly Part 3: Safe Speed and Part 2: Safe Roads. I have also been to the relevant stretches of road, driving at different speeds and assessing the many technical considerations outlined in the documents mentioned, as well as reviewing this from a pedestrian perspective and as a driver entering from driveways.

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Technical Directions: supporting for the road to remain 60km/hr in this stretch

1. CONCERNS AND CASE FOR CHANGE: Since meeting I have reviewed the PowerPoint overview you provided, the NSW Government Technical Direction TD 00030:2023 (Tech Direction) and the AustRoads Guide:
    a. FIRST PRINCIPLES – If it's an arterial road, which Barrenjoey Road is – it should be 60km/hr as per ***section 9.4.13 – 60km/hr:*** Section 9.4.13 outlines the approach for setting 60km/hr speed limits and states *"a speed zone of 60km/hr is recommended for roads in built up areas e.g. major arterial road"*. **Barrenjoey Road is a major arterial road, the only one on the peninsula, with 6 lanes at the Newport Hill stretch. Its road features and geometry are in stark contrast to side council roads which have a default speed of 50km/hr and it has very low pedestrian activity and no 'place'.**
    b. SELF EXPLANING ROADS – NEWPORT HILL: Having reviewed the meaning of self-explaining roads I do not think 50km/hr is appropriate for this stretch. As per 5.6 of Tech Direction "For streets and roads signposted at 60km/hr the design speed should match the context and movement function of the street." Recognising that side roads are defaulted at 50km/hr it is almost impossible to rationalise how a 6-lane section of Barrenjoey Road could be considered self-explaining at 50km/hr particular.
    c. The 'exceptions' as to when an arterial road may not be appropriate for 60km/hr do not apply to Newport Hill. Section 9.4.12 – Outlines when a road may not be appropriate for 60km/hr but the example given does not apply to Newport Hill – there is no example I can think of, that would justify the drop to 50km/h and this consideration is better addressed by parking changes as outlined above. The section states *"Some state roads where 40 or 60km/hr may not be appropriate due to large volumes of vehicles e.g. industrial area"* – however there is nothing to warrant a 50km/hr drop. I understand the retirement village is there but I reject that this justifies a speed limit drop – there are safety concerns but that is due to parked cars blocking visibility and access to the lane closest to the footpath.
    d. <u>6.2 Principle 3</u> *" Speed zones should ensure safe, efficient and reliable travel on roads that have a primary movement function" AND SAFE AND EFFICIENT MOVING OF PEOPLE – SECTION 1 OF Tech Direction"* the safe and efficient movement of people and goods, facilitate people-centred environments and connected places." And balancing this

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need to move people and goods with amenity and quality of places.

In relation to Newport hill:

1. This road IS **THE** primary movement function of the peninsula – the only state road to get from A to B. This section has high movement function and LOW place function – it therefore should not have speed reduced.
2. There is a need to prioritise movement of people as it's the main route home after a long journey.
3. The road user will perceive this road as appropriately 60km/hr due to straightness, good delineation under all conditions, and is a roadside free of unforgiving hazards, low pedestrians, no road hazards, wide lanes, sealed shoulder, set back of housing, limited number of driveways.
4. **"Comfortable and safe driving occurs when the road users operate below a stressful process and decision making" – section 5.7 Tech Direction** – in this stretch of road it is completely counter intuitive to drop to 50km/hr – it requires pumping of breaks, the car can't even drift down the hill normally, it is no intuitive or 'self explaining' and will cause stress. The speed limit of 50km/hr will not be "compatible with the road design and roadside environment."
5. Physical features should be taken into account (Section 8.4.6.2.8) and for this stretch there are 6 lanes, straight road, kerbed and guttered and no place considerations.
6. there is no people-centred action with only 10 driveway entrances and low pedestrian activity.
7. There are **no** concerns such as no high pedestrian activity, no winding roads, 3 lanes that would prompt lower speed limits.
8. Access points – 8.4.6.2.12 – There are ~ 10 driveways only and access can be improved by changing parking conditions to improve visibility.
9. Is the Crash Rate data higher than stereotypical crash rate? And if not then that provides further support to keep speed the same.
10. What is the 85th percentile speed for each stretch of road (as referred to previously)?
11. I do not believe there is 'clear rationale' as required by section 8.4.7.
12. The community is also cynical it will be used to revenue raise especially on Newport Hill which is not a self-explaining road.

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In relation to Avalon Village to Crane Lodge place:

Avalon village to Crane Lodge Place: This could be 60km/hr and I request you justify 50km/hr drop. Although consistency is preferable the minimum distance as per the tech direction is 0.5km (for 60km/hr) or min 3min drive at this speed. This is a 3 min drive and over 0.5km so therefore should remain 60 in this stretch and the argument for consistency should be rejected.

In relation to all sections subject to speed changes: **general comments and challenges**

1. LACK OF CONSULTATION AS PER 'STEP 4' as outlined in 8.4.1 and 8.4.6 of the Tech Direction – Step 4 "Comprehensive Speed Zone Review - community engagement assessment" and Principle 6 (6.6) <u>that "Local government and the community shall be engaged in the speed zoning process"</u> and the AustRoads guides 8.5 states *"An essential element for progressing speed management involves consulting stakeholders and communities about their concerns and priorities. Importantly, a strong evidence base is critical to bring the community along and to assist them in understanding what speed management is and what the problems may be. Keeping stakeholders and the community informed and involved in speed management issues can build support, improve decision making and lead to ownership and responsibility for positive road safety outcomes."* Specifically:
    a. Was community consultation done, and when did this occur, and can documentation be provided?
    b. Was Northern Beaches Council Notified as per Step 3?
    c. Was Northern Beaches Council in partnership with TfNSW involved in conducting engagement with local communities and road users during the receive process?
    d. Were 'community and stakeholder views' considered in the preliminary review as per 8.4.4 and how many stakeholders, who were they (recognising the broad stakeholder groups impacted by speed changes)?
    e. 8.4.6.1 Specifically recognises that there is an opportunity to educate the community and well managed engagement, and planned communications are preferable as part of the Comprehensive Review as well as demonstrating rationale for changes as well as working with local government. Has any of this been done? If so, can details be provided?
    f. Received Requests as per Section 8.4.3 of the Tech Direction – how many requests have been received and documented for each stretch of road? By which parties?
    g. Infrastructure upgrades as per section 8.4.4: To what extent were infrastructure upgrades, particularly fixing potholes and repairing roads, considered in the review and is there recognition that this should be a priority above dropping speeds? Safety issues on roads are primarily due to potholes and flooding e.g. Bilgola bends and other stretches of road.

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h. Stereotypical crash rate vs actual crash rate: I understand all 46 crashes are spread very evenly across the proposed change area, with only 1 fatality. Can you please confirm for each stretch of road – Newport Hill, Newport Village, Exiting Newport Village, Bilgola Bends, Bends > Avalon Village, Avalon Village, Avalon Village > Careel Bay **whether Crash rate is higher that stereotypical crash rate and provide data**. If not, I do not believe there is a basis for speed zone changes.

   i. Is the actual considered 'high incidence' as per 8.1? And if so is TfNSW sure they can't reasonably be treated with alternatives e.g. fixing the potholes on Bilgola Bends which have not been addressed properly (see below).
   ii. Please provide the data for each crash as per 8.4.6.3.1 8 points.
   iii. What is the crash rate:
      1. Overall?
      1. For each of the stretches?
      2. Is it below 34.3 in each instance of 1 and 2 above?
      3. What is the 85th percentile speed for each stretch of road (as referred to previously)?

j. CLEAR RATIONALE – Section 8.4.7

i.Is there clear rationale as required by 8.4.6 for all the policy principles? Especially for Newport hill? I would argue there is not

ii. What supporting infrastructure works has been recommended and has funding been allocated? I am particularly worried this has not been done. Bilgola Bends is getting a high friction surface but not for the whole length. Almost comically, the worst areas, with continual potholes, poorly patched, uneven, (and even if patched, re-pothole even with small rain) bust tyres and cause swerving have not been included in the resurfacing. Additionally, to stop this from happening continually there needs to be **structural drainage works as** there are sections that completely pool with water!!! Additionally, the road may be at risk of collapse like the Blue Mountains.

Communication: the lack thereof

I have concern that I was not communicated with ahead of the community, that council may not have been, particularly councillors and that reasoning was not sufficient in comms provided. Please outline all consultation with the community and Northern Beaches Council.

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Monitoring and Communication – please advise the plan for this and how I and the community can be involved?

I look forward to your response, particularly regarding keeping Newport Hill at 60km/hr and instead changing parking conditions.

Yours sincerely,

Jacqui Scruby
Independent Member for Pittwater

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