Anthony Vuleta, CEO Town of Victoria Park 99 Shepperton Road Victoria Park WA 6100

29th July 2021

Re: Proposed partial road closure of dedicated road adjoining 355-357 Shepperton Road

Dear Anthony,

Please accept this submission for consideration of the proposed partial road closure as advertised in the: public notice of proposed partial road closure - ROW54

The public notice states that "Alternate access has been designed to replace the closed portion and will be implemented following the closure of the subject portion."

It is unclear how long it will be before the alternate access is available after the road closure. If the alternate access is not available at the time the road is closed then this will force all traffic to exit and enter via Oats street adding an additional volume of traffic onto what is already a fairly busy section of road.

Closing off the existing laneway will also create a serious hazard by forcing delivery trucks from Bunnings and Officeworks to reverse back out onto Oats street as there will not be any turnaround space once the existing road is closed. The site distance from a truck cab while reversing onto Oats street is likely to be very small to none, presenting real danger to oncoming traffic and pedestrians.

Creating a hazard is not in the public interest. The Town should consider leaving the existing road open to traffic until after the new realignment and crossover onto Shepperton Road is complete and available for use.

As the re-alignment will require a new crossover onto a major State owned arterial road it is likely that a development approval will be required from the WAPC. Previous Council documents indicated that Main Roads would build a new deceleration lane to provide a slowdown and turn in lane along Shepperton Road. This will require Main Roads to first design the deceleration lane and then to construct it. Depending on where the deceleration lane is constructed, it too may require approval from the State Government where the lane and the crossover may encroach on State owned land that is outside of the road reserve. Even without the requirement for State Government approval the design, allocation of resources and construction of the deceleration lane and crossover will take some time. The Town should consider leaving the existing road open until Main Roads have completed the works and the new roadway is fully operational.

In considering whether to allow a new access onto Shepperton Road, Main Roads would ordinarily carry out a review of the likely traffic flows. It is unclear whether a formal application to Main Roads has been lodged by the Town for this proposed new access road. Previously the Town has advised Council that the repositioning of the access road will satisfy Main Road requirements however, it is not clear if this advice can be considered as official approval of the re-alignment or if it can in any way be relied upon without awaiting the outcome of a formal submission.

Is the advice that the Town received from Main Roads a legally binding approval or is it just a Main Roads officer's opinion that is subject to a formal approval process?

Without a formal approval being granted by Main Roads, and potentially WAPC or some other State Authority, then the intention of the Town to re-align the road to exit onto Shepperton road in the new location may not be realisable. Without official approval from all relevant parties there is a risk that a new exit point may not be permitted.

The Town should consider leaving the existing road open to traffic until after official approval has been granted and the realignment and crossover onto Shepperton Road is complete and available for use.

It is unclear whether Fabcot have lodged a development application and whether Main Roads will require a traffic study for the proposed new development before they commit to an opinion about the new crossover and deceleration lane. Shepperton Road is a main arterial road and previously in assessing new developments Main Roads has refused any new access points directly onto major roads preferring instead to have locally generated traffic enter the road network via a lower order road. In this location Albany Highway and Oats streets are the only other roads available and they both present difficulties in providing safe entry and exit points. A shopping centre is proposed to be built on the site which will by its very nature produce a much larger volume of traffic that currently exists and it is possible that Main Roads will not wish for that traffic to enter directly onto Shepperton Road.

The risk is that by closing the road without the new roadway and crossover in place the existing laneway may become a dead end with only entry/exit from Oats street. The existing laneway between Office Works and Bunnings is too narrow to allow passing traffic and can be completely blocked while trucks are manoeuvring or unloading at the docks.

To close the existing roadway without the new access point in place would be against the public interest and will create an avoidable hazard for motorists and pedestrians.

The Town should consider leaving the existing road open to traffic until after the realignment and crossover onto Shepperton Road is complete and available for use.

It would also be helpful if the Town made it clear what each step in the process is, the timeframes, and what likely impacts they will have on people who frequent the area.

Yours sincerely