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## Submission to City of Melbourne Draft Walking Plan 2014-17

### Introduction

Thank you for consulting Victoria Walks in the development of the Draft Walking Plan 2014-2017 (the Plan).

Victoria Walks applauds the City of Melbourne for developing a comprehensive plan for improving walkability in the city. Particularly important elements include:

- Addressing pedestrian crowding around key public transport nodes.
- Conversion of numerous streets to various forms of pedestrian or shared space
- Expansion of auto-on (auto green) for walkers into Carlton and Southbank

We would particularly like to commend the Council for the intensive background work that underpins the strategy. We believe some aspects, such as the research into the economic value of walking connections and business use of street space, are world leading.

There is always room for improvement and we have identified a range of recommended changes to further improve the walkability of the city, as set out in later sections of this submission.

### Background – Victoria Walks

Victoria Walks is a walking health promotion body working to get more Victorians walking every day. Our vision is for vibrant, supportive and strong neighbourhoods and communities where people can and do choose to walk wherever possible.

Our cities, towns, neighbourhoods and urban areas have become largely automobile dependent and less walkable. This has contributed to the emergence of more sedentary lifestyles in which Victorians do not engage in the recommended levels of physical activity. Physical inactivity is a significant factor in the dramatic rise in the levels of obesity and preventable diseases such as Type II diabetes and cardiovascular disease.

Walking-friendly neighbourhoods and urban spaces are essential to encourage and enable people to walk. Walking is associated with positive health outcomes, improved fitness and

better physical, social and mental health. Making towns, cities and suburbs more walkable has many health, environmental and economic benefits.

## **Specific comments on the Plan**

The following sections provide specific comment under the same headings that are adopted in the Walking Plan.

### **Challenges for walking in Melbourne**

On page 16, the discussion says:

“Traffic congestion in Melbourne costs the city’s economy \$3 billion a year. This is projected to rise to \$6 billion by 2020 (BTRE, 2007, p. 13). A significant amount of the traffic congestion experienced in Melbourne is suffered by people walking, especially through delays at traffic lights or other crossings.”

Pedestrian congestion is a significant issue, but it is not a subset of vehicular traffic congestion, as the paragraph implies. The BTRE report quoted did not consider the cost of pedestrian congestion. These are two different issues and it would be better to discuss them separately, or delete the reference to traffic congestion.

#### Recommendations

1. Review discussion of traffic congestion on page 16.

### **1.1 A central city subregion walking plan**

Victoria Walks supports this section as far as it goes, but there is potential for collaboration between councils and agencies within the central subregion to identify and foster priority walking connections. This is important to facilitate walking as a mode of transport into the inner city (as opposed to within it).

We note that Plan Melbourne includes an action under Initiative 3.1.5:

“Identify key pedestrian routes in and to the Central Subregion and improve pedestrian crossing times and footpaths and general amenity.”

The Department of Transport, Planning and Local Infrastructure (DTPLI) is the agency nominated as responsible. There is a similar action under Initiative 4.3.1, with the Metropolitan Planning Authority as the responsible agency.

#### Recommendations

2. Add a new Action 1.1.4:

Work with the Department of Transport, Planning and Local Infrastructure, the Metropolitan Planning Authority and relevant councils to identify key pedestrian routes into the City of Melbourne from other parts of the Central Subregion.

## **1.2 Using the Planning Scheme to improve the walking network**

The second paragraph under 'issues' refers to 'Developer Contributions Plans.' We believe it would be more correct and consistent with the rest of the sentence to refer to 'Development Contributions Plan Overlays.' Alternatively, the phrase 'Development Contributions Plans' could be used.

## **1.3 Principal Pedestrian Networks**

Victoria Walks supports this section, but the action suggests that a Principal Pedestrian Network (PPN) should be defined in the State Planning Policy Framework. This would be an unusual mechanism for implementing a PPN. A PPN should be adopted by the City of Melbourne and implemented through Council actions and by VicRoads through Smart Roads.

### Recommendations

3. Reconsider Action 1.3.1 in relation to mechanisms for implementing the PPN.

## **2.1 Smart Roads**

Victoria Walks strongly supports Action 2.1.4 – developing a place based approach for Smart Roads. Such a model would be very helpful in broader road management across Victoria.

## **2.2 Signal operation**

Victoria Walks appreciates that the City of Melbourne has put significant effort into considering how signal operation could be improved for pedestrians. However, in our view more could and should be done in this area.

Victoria Walks supports the expansion of auto-on, but the discussion does not acknowledge the issue of pedestrian confusion about where and when it applies. How does a pedestrian know whether they need to push the button or not? They can only learn through their experience of walking in particularly areas. Therefore the application of auto-on needs to be extremely simple – in areas where it is used it should apply at all signals, at all times. The City should investigate audio-tactile volume options that allow operation at night.

In areas where auto-on is not in operation or proposed, late introduction (or late call-up) should be available. If not the walker (who may not be aware that they need to push the button) may well be forced to wait for a full cycle, even though the signals could allow them to cross without any inconvenience to other road users. This situation invites, almost requires, non-compliance.

Victoria Walks is not entirely convinced by some elements of the discussion of options that were discounted, in Appendix 1. In particular:

- The benefit of pedestrian countdowns is not pedestrian safety, it is convenience. Countdowns enable people to cross with greater confidence, knowing how long they have to cross. If more people cross after the end of the green walk phase this means fewer people are delayed. There is only a risk to pedestrian safety if it increases the number of people who are still on the crossing after the clearance time. Other parts

of Melbourne are starting to progress pedestrian countdowns – a trial should be conducted at a minimum, as recommended by the Traffinity report (Nash 2014).

- We accept the City’s rationale for not utilising pedestrian early starts in the CBD. However they should be implemented in areas outside the CBD where drivers may not be expecting pedestrians.
- Victoria Walks accepts the reasons for not utilising Barnes walks.

Finally, signal operation should be reconsidered in locations where pedestrians have to wait through two cycles to cross the road – usually on very wide streets with multiple traffic streams and/or large central medians. Signals should allow walkers to cross the road in one movement.

Victoria Walks supports Action 2.2.1:

“Assess pedestrian delay at intersections across the city and develop a prioritised list of projects to reduce it, focusing on the busiest intersections first.”

The issues identified above should be addressed in that review.

### Recommendations

#### 4. Add the following actions:

“Conduct a trial of pedestrian countdowns.”

“Introduce pedestrian early starts at locations outside the Hoddle Grid, where they will not add delay for trams, or cyclists on primary cycling routes.”

“Provide late-introduction for pedestrians at signals that do not provide auto-on.”

“Review signal operation in locations where pedestrians may have to wait through two cycles to cross the road.”

“Investigate options to allow 24 hour operation of auto-on.”

## **2.3 Pedestrian street hierarchy**

This section and the sections that follow essentially relate to the need to reprioritise space in the city, to give more space to walkers and less space to vehicles. This is necessary because of:

- The rapidly increasing number and proportion of walking trips, as opposed to the diminishing significance of vehicle access
- The limited space available in the central city, with increased pedestrian numbers and crowding
- The fact that pedestrians use the limited space much more efficiently than vehicles.

Re-orienting space will improve pedestrian comfort, reduce pedestrian crowding and create more interesting and commercially successful streetscapes. As proposed in the Plan, it will

not have any significant impact on vehicle traffic. Genuine 'World Cities' have been or are re-orienting their road space towards people and away from vehicles.

There does not seem to be any general discussion of this fundamental issue of allocation of space in the Plan. This section would perhaps be the best place to include such a discussion, although the 'challenges for walking in Melbourne' section at the start of the Plan would also be appropriate.

Victoria Walks supports the hierarchy, but suggests that Lygon Street is not a good example to use for the lowest level of pedestrian function. Intuitively, Lygon Street should have high pedestrian function.

### Recommendations

5. Include a general discussion of allocation of street space in the Plan.
6. Use a different example to illustrate 'other streets used by pedestrians' in the table on page 35.

## **2.4 Convert streets to places**

Victoria Walks supports this section. If the City has ambitions to be a genuine World City we need more exclusively pedestrian spaces.

We support the current model such as Degraeves Street for Streets as Places, but other options need to be considered. Current models tend to be very small, narrow streets dominated by on-street dining – they are adult spaces. There is virtually nowhere in the Hoddle Grid where small children can walk, run or play freely without a risk from vehicles. Even spaces without cars, such as Swanston Street and Bourke St Mall, still have vehicles. There are playgrounds on the fringe of the CBD such as at Birrarung Marr, but children should not be marginalised.

There should be family friendly streets in the heart of the city where children are free to play without risk from vehicles. This is critical if we want a truly inclusive city. The absence of such a space in the CBD is a notable contrast to other cities, such as Bendigo.

The wording of action 2.4.1 – “investigate the suitability of the proposed Streets as Places” – is quite weak. There is no firm commitment to implementation. This section is also somewhat confusing for the reader as some initiatives have their own specific actions, whereas others are only referred to on the map.

### Recommendations

7. Amend Action 2.4.1 to read:  
  
“Develop Streets as Places as indicated on the Proposed Streets as Places map.”
8. Include a new action:  
  
“Identify a location within the Hoddle Grid for a Street as Place incorporating a playground and/or other family friendly features.”



**Figure 1 – Playground and pedestrian space in Hargreaves Mall, Bendigo.  
Why is there no similar space in central Melbourne?**

## **2.5 Create new walking streets**

Once again, the wording of the action is weak.

### Recommendations

9. Amend Action 2.5.1 to read:

“Develop Walking Streets as indicated on the Proposed Walking Streets map.”

## **2.6 High mobility walking streets**

We support the proposed conversion of Elizabeth Street and part of Collins Street to High Mobility Walking Streets. Where an ongoing traffic function needs to be retained during the day, the street should be a shared space based on the European (e.g. German) model, with maximum 20km/h speed limits (or ‘Pedestrian Priority Zones’). This would also lessen the need for fencing along tram super stops that funnel patrons onto crossings to access the stops.

Once again, however, the wording of the action is weak and should be strengthened.

There are also various references to Melbourne Metro. Given the change of government policy on this project, it may be necessary to consider alternate scenarios.

## Recommendations

10. Amend Action 2.6.1 to read:

“Develop High Mobility Walking Streets as indicated on the Proposed High Mobility Walking Streets map.”

### **2.7 Create new shared zones**

Victoria Walks supports the substantive policy of this section, as far as it goes. We see a substantially greater long term role for shared zones, discussed later in this submission under ‘long term vision.’

It seems unusual that shared zones are not encompassed in the pedestrian street hierarchy of section 2.3.

## Recommendations

11. Review the structure of the Plan and Pedestrian Street Hierarchy in relation to shared zones.

### **2.8 Making roads safer for pedestrians**

The City should adopt a Safe System approach and establish a ‘forgiving’ road transport system. As set out in the National Road Safety Strategy 2010-2020:

“The road system must allow for human error [including pedestrian error] and provide forgiving environments that prevent serious injury or death when crashes occur...  
Speeds must be managed so that humans are not exposed to impact forces beyond their physical tolerance. System designers and operators need to take into account the limits of the human body in designing and maintaining roads, vehicles and speeds.”  
(ATC 2011, p.34)

While the move to 40km/h speed limits is a step in the right direction, it is questionable whether it establishes a genuinely safe system. While exact estimates of average human tolerance vary, the diagram below indicates that a pedestrian hit by a car at 40 km/h still has a 20% chance of fatality, compared to a 5% chance at 30km/h. As a result, international best practice on safe speed is 30km/h speed limits for the majority of roads (WHO 2013).

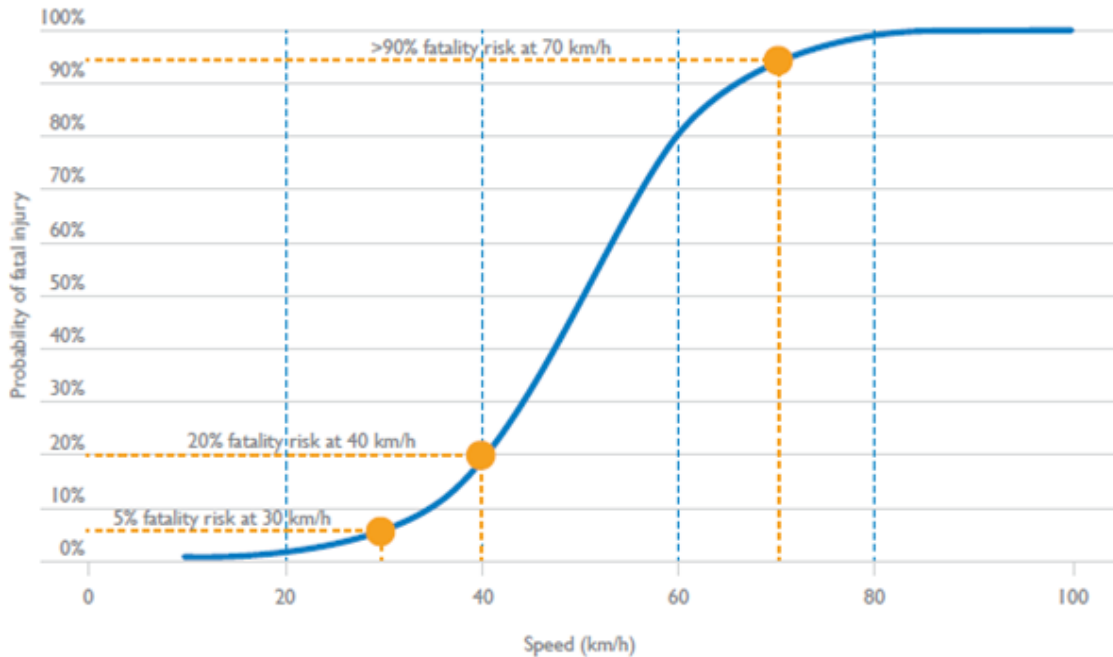
The International Transport Forum (OECD) states:

“The implementation of 30 km/h zones in city centres and in all residential areas has proven to be highly effective.

...

“In urban areas, 30 km/h zones should be incorporated in to the majority of streets, with only a few main roads remaining at a posted speed limit of 50 km/h.” (ITF 2012)

Victoria Walks strongly recommends that the City seek to establish 30 km/h speed limits in at least some streets. The question needs to be asked – if we are not prepared to consider 30km/h vehicle speed limits in the CBD, where walking is the dominant transport mode, where will it be considered?



**The impact of vehicle speeds on fatality rates for pedestrians  
(Austroads cited in Australian Government 2012, p94)**

Victoria Walks is concerned that Action 2.8.1 could be interpreted as a review of the 40km/h speed limit in order to consider a return to higher speed limits. This would be a backward step for pedestrian safety and we assume this is not the intent of the action.

Victoria Walks supports the apparent concept of Action 2.8.2, to extend 40km/h speed limits outside the CBD. However, we are concerned by the wording “where pedestrian volumes are high.” This implies a highly localised or perhaps street by street approach, which is not desirable. Contrast this with the Cities of Yarra and Port Phillip, where the majority of streets are already 40km/h. Existing pedestrian volumes are one issue to consider, but should not be a prerequisite for lower speed limits. The introductory wording to the action – “investigate” – is also quite weak. The City should at least commit to introduction in some areas. Kensington may be an appropriate location, given the higher concentration of vision impaired pedestrians around the Vision Australia office.

The City’s Road Safety Plan 2013-2017 contains directions to not only expand 40km/h areas but also to design streets for lower speeds. This is an important element and should be included in the Walk Plan also.

Despite the heading, this section of the Walking Plan is entirely focused on vehicle speed. Vehicle speed is a very important pedestrian safety issue, but it is not the only pedestrian safety issue.

We urge the City to take a holistic view to pedestrian safety, including recognition of the extent to which pedestrians suffer trauma from falls in public space. Studies in OECD countries show that up to one third of pedestrian fatalities and three quarters of injuries are due to falls in public spaces (ITF 2011). Details of street design, construction and maintenance are important. Victoria Walks’ seniors research (Garrard 2013) surveyed 1,128 Victorian seniors. When asked about barriers to walking, poorly maintained footpaths were



the second highest rating concern for seniors (after dogs that are off-leash or not under control).

### Recommendations

12. Revise the section to take a broader approach to pedestrian safety.

13. Revise Action 2.8.1 to read:

“Evaluate the performance of 40 km/h speed limits in the central city, including road safety and other costs and benefits, to inform the next steps towards the implementation of a safe system.”

14. Revise Action 2.8.2 to read:

“Implement area wide speed limit reductions to 40 km/h on local streets throughout the City of Melbourne.”

15. Include new actions as follows, or similar:

“Design streets for lower speeds when planning road upgrades.”

“Establish 30 km/h speed limits in appropriate areas of the central city.”

## **2.10 Stop lines**

Victoria Walks supports the proposed approach to stop lines. It should be noted that this is most importantly a safety issue. If vehicles do not stop, there is a real risk that they will hit a pedestrian, who are likely to consider themselves ‘on the footpath’ and will not be looking for vehicles.

### Recommendations

16. Add discussion of safety aspects to rationale for stop lines.

## **2.12 Promoting health**

Victoria Walks supports this section. It is important to recognise that while walking is a practical necessity in a city with such high numbers of people and limited space, it also has significant health benefits for residents, workers and visitors.

## **3.1 Addressing pedestrian crowding**

The discussion of issues in this section should be reconsidered. Local guidance on pedestrian crowding may not be available, but the Transport for London standards are well recognised. While the wording “In general higher crowding levels can be tolerated in the approach to busy transport interchanges...” is, strictly speaking, correct, this could be seen as inconsistent with later actions to address crowding in those areas.

The actions in this section are not very specific, they should link with the more specific initiatives in other parts of the Plan that address crowding, such as sections 2.3-2.7 and 3.4.

## Recommendations

17. Revise the discussion of issues to acknowledge Transport for London guidance and note that there is a limit to the tolerable level of crowding around transport interchanges.
18. Add cross-referencing to other sections that address crowding.

### **3.2 Pedestrian crossings at intersections**

Victoria Walks supports this section, especially Action 3.2.4 to work with Victoria Police, VicRoads and PTV to prevent vehicles from blocking crossings. However there are additional issues such as red light running, exceeding the speed limit, failing to give way to pedestrians and issuing infringements to drivers of vehicles that block intersections (that is, the issue is more than 'preventing' as described in the action). A much stronger emphasis on enforcement is required.

## Recommendations

19. Add a new action:

“Advocate for greater enforcement action in response to vehicles blocking intersections, running red lights, exceeding the speed limit and failing to give way to pedestrians.”

### **3.3 Master plans**

In this section there seems to be an inconsistency between the title of the maps and the content. They appear to show issues in these areas more than improvements, particularly the map of future master plan areas.

### **3.5 Tram and bus stops**

Victoria Walks strongly supports this section. Current tram stop design appears to give no consideration to pedestrian crowding or impact on the potential for mid-block crossing. For example the new tram stop on Elizabeth Street, south of Bourke Street, creates a substantial obstacle to mid-block crossing. This blockage impact of tram stops is becoming more pronounced as trams and tram superstops get longer.

Tram stops such as the Bourke Street stop approaching Spencer Street funnel large numbers of passengers into very small entry and exit points, creating artificial 'choke points' that generate pedestrian delay. This in turn encourages unsafe behaviour, as people look to find ways around the choke point.

This section addresses the choke point issue in tram stop design, but does not specifically address the obstacle to mid-block crossing.

The map of tram stops likely to be overcrowded by 2030 appears conservative. For example the Bourke Street stop adjacent to Spencer Street already appears to be at capacity at peak times. Passengers are sometimes unable to fully exit the southern side of the stop during the crossing phase of the traffic lights in the evening peak and in the morning peak the northern side is often uncomfortably crowded.

If the Melbourne Rail Link project proceeds as currently planned, this will significantly alter the distribution of passenger growth and associated pedestrian crowding at public transport stops around the CBD. Our understanding is that pedestrian volumes at and around Southern Cross would increase significantly. In that scenario, the role of Spencer Street would probably need to be reconsidered, as it would need to function primarily as a pedestrian street, at least between Collins and Bourke Streets.

### Recommendations

20. Add discussion of the potential barrier effect of tram superstops in preventing mid-block crossing and the need to avoid tram stop design that blocks pedestrian movement.
21. Review map of tram stops likely to be over capacity by 2030, with a view to adding stops, including Bourke Street adjacent to Spencer Street.

### **3.6 Increasing the number of formal crossings**

Victoria Walks supports this section.

In considering where new crossings might be installed, Victoria Walks recommends prioritising and retrofitting existing roundabouts with zebra crossings (such as the intersection of Pelham and Drummond Streets). We are pleased that the City no longer installs roundabouts, which are dangerous and/or inconvenient to pedestrians (who have no right of way at roundabouts and must yield to all other traffic).

Zebra crossings at roundabouts should be installed in the style of the Faraday and Cardigan Streets roundabout.

Victoria Walks supports Action 3.6.1:

“Develop a prioritised list of locations for new pedestrian crossings and work with VicRoads to install them.”

In developing such a list it would be appropriate to reconsider the location of some existing crossings. For example the pedestrian operated signals across Lygon Street just south of Pelham Street are problematic. Drivers come around the corner from Pelham Street and may fail to see the lights at the crossing, which they enter almost immediately after turning.

### Recommendations

22. Add new action:

“Progressively install zebra crossings, on pedestrian desire lines, at intersections with roundabouts.”

### **3.7 Making streets easier to cross**

Victoria Walks supports this section, but the right to cross without a formal crossing should be more strongly asserted. The right to cross is not necessarily understood and even amongst road management authorities there is often a view that pedestrians should seek out formal crossings rather than crossing the road on the most direct route.

In addition to painted medians, raised thresholds assist crossing of side streets along arterial roads (at non-signalised intersections) and are already utilised by a number of Victorian councils including Darebin and Boroondara. Other initiatives currently or potentially in the Plan such as using various forms of shared space and reducing speed limits would also assist in facilitating crossing at uncontrolled locations and this should be noted in the discussion.

The current wording of the action could give the impression that it is not legal to cross without a formal crossing.

### Recommendations

23. Replace the first sentence under 'issues' with the following:

“Pedestrians are not legally required to use formal crossings to cross the road (unless one is available within 20 metres). Mid-block crossing allows convenient, direct journeys and reduces crowding at formal crossing points.

24. Amend Action 3.7.1 to read:

“Investigate techniques to assist pedestrians to cross city streets safely at ‘non-crossing’ locations, including medians, pedestrian refuges and raised thresholds.”

## **Issues not addressed in the plan**

### **Long term vision**

The plan has a short timeframe, encompassing the period 2014 to 2017. The actions in the Plan are generally good short term steps, but the Plan does not establish a long term vision for walking in the city.

A key element of the long term vision for the city should include all ‘little streets’ (streets generally less than a 20 metre wide road reserve) within the Hoddle Grid as pedestrian spaces or shared spaces. It is unreasonable to continue to dedicate the majority of space in these narrow streets to exclusive use by vehicles, when the dominant mode of transport is walking. Any vehicle use of these streets should be oriented to property access – they should not have a through-traffic function and they should not have a parking function beyond loading or providing access to existing off-street car parking. On those streets where an ongoing traffic function needs to be retained during the day, the street should be a shared space based on the German model, with maximum 20km/h speed limits and vehicles (including bikes) required to give way to walkers. This is not only a walking for transport issue – this model will improve the liveability, tourism and economic potential of the city, as demonstrated by the Tivendale Transport Consulting report *CBD Shared Zones*.

### Recommendations

25. Introduce a long term vision, including all narrow streets within the Hoddle Grid as shared space, with 20km/h speed limits and pedestrian right of way.

## **Cycling**

Victoria Walks supports the Council's efforts to encouraging cycling in the City and believes that more bicycles on the roads generally makes for a safer walking environment. Victoria Walks believes that as bicycles are vehicles they belong on the road, or on dedicated cycling paths.

Footpath space should not be given over to bicycles as has occurred with the creation of the Nicholson Street shared path, which is highly disadvantageous for pedestrians and not ideal for cyclists. It has also created the situation where many bike riders continue to ride on the footpath, and across signalised crossings, beyond the end of the shared path (e.g. crossing Victoria St and along Nicholson St). This is in part due to the mixed and confusing message the shared path sends to bicycle riders (where the path starts and ends and what riders legal obligations are). Clearly, in being vehicles, bicycles belong on the road; the issue is the roads need to be made safer for bike riders. There needs to be better policing of illegal bike riding on footpaths and on crossings.

Victoria Walks supports strongly the position taken by the City not to allow bicycles to be ridden in parks such as Carlton Gardens. Parks and gardens are not only pedestrian walking routes, they are spaces to sit, play, talk, relax, learn, play and have fun. Melbourne's world standard parks should not be turned into vehicle transport routes.

### Recommendations

26. Include actions to:

- a) Dedicate footpaths to walkers and provide separate cycling facilities
- b) Advocate for enforcement action in response to illegal cycling on footpaths.

## **Motorbike parking**

Between 2005 and 2010, in Victoria the registrations of motor bikes grew by 45% (ABS 2011). Similarly, there has been an obvious growth in the number of motorbikes coming into the CBD. This has resulted in a marked increase in the number of motorbikes parking on footpaths in inner Melbourne.

In expanding footpaths it appears that the City is spending significant sums of money, under the guise of increasing walkability, to build what in some cases are free motorbike parking lots.

Victoria Walks acknowledge (but do not support) Victoria Road Rules that generally allow the parking of motorcycles on footpaths. This raises two key issues:

- Motorbikes occupy valuable public space and may be parked in ways that obstruct pedestrians, delivery vehicles and public transport users.
- The vast majority of motorbike riders who park on footpaths ride their motorbikes on the footpath to park (illegally in our view).

The Victorian Motorcycle Advisory Council have produced guidelines for parking motorcycles on footpaths (VMAC 2008), but these guidelines are not enforceable.

Councils are able to limit motorbike parking on footpaths in defined areas. Victoria Walks believes motorbikes should not be parked on any footpaths, but a compromise option is set out below.

### Recommendations

27. Include an action to prohibit motorbike parking:

- a) On congested footpaths (eg Bourke St near Southern Cross)
- b) Where motorbikes need to be or are typically ridden on the footpath to access them, such as where there is no trafficable road adjacent to the parking location (eg tram superstop on south side of Bourke St, east of Swanston St)
- c) Next to the building line, where they may impede pedestrians, particularly those with vision impairment.

28. Include a new action:

“Investigate options to promote, implement and enforce the Victorian Motorcycle Advisory Council *Guidelines for Parking Motorcycles and Scooters on Footpaths*.”

## Conclusions

Victoria Walks strongly supports the Draft Walking Plan 2014-2017.

Our submission has set out a range of opportunities to further strengthen the Plan. Key elements include:

- Providing a long term vision beyond 2017, including all narrow streets in the CBD as pedestrian or shared spaces
- Changes to traffic signal operation including late introduction, use of pedestrian early starts in some locations and trialling pedestrian countdowns
- Developing a child friendly pedestrian street in the CBD
- A broader approach to pedestrian safety and a commitment to further exploring safe speed
- Stronger commitment to facilitating informal road crossing
- Appropriate control of motorcycle parking on footpaths.

Victoria Walks would be happy to be heard in support of this submission.

If you have any queries regarding this submission please contact Duane Burt, Senior Walkable Communities Advisor on [dburt@victoriawalks.org.au](mailto:dburt@victoriawalks.org.au) or 9662 3975.

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