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## **Comments on the Medium Density Housing Strategy**

The Public Transport Users Association (PTUA) is the recognised consumer group representing passengers on all forms of public transport throughout Victoria. It promotes policies for ecologically sustainable transport, and is a non-profit, voluntary organisation with no political affiliation.

The Geelong branch of the Association thanks the City of Greater Geelong for the opportunity to make the following comments on the *Medium Density Housing Strategy*.

### **1) Support for general principles of the Strategy**

We support the general principle of choosing land that is close to activity centres, and is well-served by public transport, as the best location for developing housing of higher densities.

We also believe a higher-density housing strategy could be a good way to maintain or increase population density, thereby improving the efficiency of future upgraded public transport services, and lessening the consumption of additional 'greenfield' land by developments on the city fringe.

### **2) A need for greater public involvement**

The Strategy is proposing a potentially radical change to the built form of Geelong's suburbs, particularly in *Increased Housing Diversity Areas* where high-density housing may be allowed in some locations for the first time.

People are likely have a number of concerns that about higher-density housing. These include such things as increased traffic movement, greater competition for car parking space, loss of vegetation and shade, increased hard surfaces and resulting run-off, changed streetscapes, “overlooking”, overshadowing and noise. We do not feel that enough has been done to raise awareness of the Strategy and to ascertain what residents' concerns might be, let alone work out how any concerns should be tackled.

The PTUA does not believe that these concerns preclude higher density housing in all locations, but we strongly support public participation in decision making. If during the development of the Strategy, the people of Geelong do not agree to the general principles, or do not see most of their concerns dealt with, the Strategy will be difficult for the City to defend when it is tested.

### **3) The Strategy should note the need for improved public transport services**

The Strategy should note the importance of bringing public transport services up to a sufficient quality, so that they can mitigate some of the adverse effects of increased housing density, such as additional car traffic, and parking problems resulting from the increased number of residents.

On the other hand, increasing housing density is often promoted by planners on the basis that it will increase public transport use, though we are relieved to see that the Strategy does not mention this as a rationale. Increasing housing density can certainly bring more people within potential public transport catchment areas. However, we maintain that the Strategy should explicitly acknowledge that increasing housing density by itself will not significantly increase use of public transport if the quality of public transport services is low.

### **4) The reasons for the size of *Increased Housing Diversity Areas* should be explained**

The Strategy explains that an 800m 'pedshed' has been adopted for sub-regional shopping centres, and a 400m 'pedshed' for all other centres, based on a ten or five minute walk respectively.

It is not clear exactly why the 400 and 800m radii have been allocated to each type of centre. We assume that the 800 metre radius for sub-regional centres was chosen because such centres are likely to serve a greater proportion of people's needs, and will therefore be a destination that residents will be willing to walk further to get to. On the other hand, we assume that the 400 metre radius would apply to smaller shopping centres, which serve fewer needs, as well as to railway stations, which are a means of getting elsewhere. However, rather than leaving people to guess at the rationale for these pedsheds, it is necessary to make this justification explicit.

It is also not clear from what point the 400 or 800 metres have been measured. Looking at the maps, we assume that the strategy picked a single central point in each centre, but that point is not identified or justified. Without further clarification, it could be argued by developers that the 400 or 800m limit should extend from the edge of the centre, thus extending the area well beyond what was envisioned. We therefore believe the choice of a central point should also be explained.

The Strategy also does not explain why some areas surrounding particular public transport facilities have not been included as *Increased Housing Diversity Areas*. Were properties around stations at North Shore and Corio rejected because of their proximity to industrial areas, or because of their stations' poor rail service levels and lack of bus connections?

This clarification could also guide the future evolution of the Strategy. For example, if bus services in Geelong were upgraded to a service frequency of every 10 minutes or less, could adjacent properties then be considered eligible to become *Increased*

*Housing Diversity Areas?* This may or may not be a desirable outcome, but a clear rationale for the choice of those areas would help to guide future decision makers.

#### **5) The 800m zone around sub-regional shopping centres needs refinement**

As mentioned above, we presume that the 800m zone around sub-regional shopping centres has been chosen on the basis that people will be prepared to walk to the shopping centre as it will meet most of their needs. However, self-containment has always been an elusive planning goal, and the trip destination of people living within the 800m radius areas will often not be the sub-regional shopping centre. We presume that the City would prefer that people travelling elsewhere did not drive their cars, if only to reduce the impacts of higher density housing on existing residents.

However, many residents of the new housing are unlikely to be prepared to walk 800m just to get on a bus to go somewhere else. Therefore, we believe that all areas between 400-800m from the sub-regional shopping centre, and which are designated as *Increased Housing Diversity Areas*, should also be within 400m or less of a high standard bus service (perhaps running every ten to fifteen minutes, or less).

In addition, the 800m radius seems to ignore the topography of some areas, with parts of East Belmont being designated as increased housing diversity areas, despite the steep hill between that area and the core shopping strip. Other sites seem to ignore pedestrian barriers such as busy major highways, or unpleasant walking environments that are likely to discourage residents from walking (an example would be the properties chosen north of the Princes Highway at Waurin Ponds). Such properties should be reviewed, and if appropriate, removed.

#### **6) High density development should be well-planned and restricted to designated areas**

The draft Strategy would permit high-density development across large areas of land designated as *Increased Housing Diversity Areas*. Although such an outcome may be unlikely, it seems the Strategy allows high-rise development in the middle of low-rise neighbourhoods up to 800 metres from the centre, with little obvious connection to that centre.

800 metres is usually considered the upper limit of walking distance from an important destination, and 400 metres as the approximate limit in suburban areas for access to a regular public transport route. Neither limit should be used to identify prime locations for densely-populated high density developments, which must provide a much shorter and more convenient walk to activity centres. High density development should therefore be restricted to areas close to the edge of each centre.

As high-density development (or significant concentrations of medium-density development) will have a significant effect on the built form of the centre and its surrounding area, we believe that both the developments and their surrounding streetscapes need to be well-planned and not undertaken in a piecemeal, un-

coordinated fashion. If this planning is to be done, the City will probably need to designate priority areas for individual structure plans to be undertaken.

**7) The difference in practice between *Incremental Development Areas* and *Increased Housing Diversity Areas* should be clarified**

If we presume that developers are likely to want to build medium density housing, where permitted, under the Strategy, the difference between the *Incremental Development Areas* and the *Increased Housing Diversity Areas* must be clarified, rather than essentially stating that medium density housing will be encouraged "more" in increased housing diversity areas.

When a developer submits plans for a proposed medium density development in an *Incremental Development Area*, it should be clear what they will need to demonstrate, or what additional tests they will they have to pass, to gain approval.

**8) Design standards are required**

As is mentioned above in our call for greater public involvement, we feel that the design of medium and higher density housing will be very important if public concerns over higher density housing are to be allayed.

Some of those concerns may be covered by the DSE's guidelines for Melbourne's activity centres. However, the Guidelines contain very few performance standards, and may require further adaptation and improvement to be successfully applied to the situation in Geelong.

We suggest that the Strategy reviews the need for standards on matters such as vegetation (including whether a vegetation plan is required to be developed), on the extent of hard surfaces, building materials, and on developer contributions for street landscaping.

**9) Adequate areas for expansion of centres should be identified**

There are clear advantages in directing retail and office development to existing centres that are well served by public transport. From a transport perspective, this is often more important than developing higher-density housing around the centres. As building higher-density housing around centres will restrict opportunities for commercial redevelopment, the City should ensure that it tries to identify and protect land that may be required for centre expansion.

Once again, we appreciate the opportunity given to comment on the Strategy.

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