



PO Box 4127
Geelong Victoria 3220
geelong@ptua.org.au
Paul Westcott
Convener
Tim Petersen
Spokesperson

**Armstrong Creek Urban Growth Plan:
Submission from the Geelong Branch of the Public Transport Users Association**

Attention: Aaron Garrett, Coordinator Strategic Planning, City of Greater Geelong.

This submission from the Public Transport Users Association's Geelong branch is in response to the call for comment on the Armstrong Creek Urban Growth Plan.

The Public Transport Users Association is the recognised consumer group representing passengers on all forms of public transport throughout Victoria. It is a non-profit, voluntary organisation, with no political affiliation.

In this submission, the PTUA's Geelong Branch deals with the following matters:

1. Support for the ideas outlined in the Structure Plan about designing a Greenfield subdivision in a more ecologically sustainable way.
2. Concern about the lack of any plan for infill residential development in Geelong's existing urban areas, and concern about the vague sequencing of development in this Plan.
3. Concern that while roads for possible public transport routes have been earmarked, there is no actual service plan for public transport.
4. A recommendation that the major shopping centre should be located on the Surfcoast Highway next to a station near the existing railway crossing.
5. An objection to the proposed high-standard road link paralleling the Warrnambool railway line, which will impede opportunities for transit-oriented development, and further divide communities north and south of the line.
6. The need for strong development controls to ensure that the Structure Plan is followed.

Each of these points is addressed in turn.

1) Support for the ideas outlined in the structure plan about designing a Greenfield subdivision in a more ecologically sustainable way

The Geelong Branch of the Public Transport Users Association supports the recognition of the importance of ecological sustainability in the plans for Armstrong Creek, particularly in the provisions relating to transport.

The identification of potential public transport facilities and routes, and local activity centres prior to construction, is a step forward, as is the recognition of the need for street layouts that are 'permeable' and pedestrian-friendly. The suggestion in the plan for areas of

higher dwelling (and presumably population) density near stations and activity centres is also welcome.

2) Concern about the lack of any plan for infill residential development in Geelong's existing urban areas, and concern about the vague sequencing of development in this Plan.

Our response to the Structure Plan is in the context of concern over the lack of active planning for urban consolidation within Geelong's existing urban area. If this continues, it will hasten the development of 'Greenfield' land, which is one of the least-desirable types of development.

While it is reasonable to have a "pressure relief valve" provided by a new Greenfield development, this type of development must be carefully staged and controlled if it is not merely going to add to urban sprawl.

The sequence of development shown in the current staging diagram is too vague to be an effective control on development. We are particularly concerned about the proposed early development of the 'island' around the major activity centre on the Surfcoast Highway. This site is distant from the existing developed area and more likely to lead to inappropriate development in the intermediate area, particularly if development does not proceed at the rate envisioned.

3) Concern that while possible roads and reservations for public transport routes have been earmarked, there is no service plan for public transport

The Geelong Branch supports the introduction of direct minor arterial or collector roads of adequate width, as it believes that these provide the best potential bus routes.

However, to make sure that all of the development area can be served by efficient and direct bus routes, proposed bus routes within the development must be actually set out. It is not enough to show roads merely as those down which buses can run. A service plan must be developed to show how the bus network will actually operate.

While the Structure Plan states that a more detailed public transport plan will be developed, we believe that this must be taken into account at the early design stage of the development.

The area's public transport will have to link with adjacent residential development in Grovedale and Waurin Ponds, and also with the existing bus networks north of the railway line. Given that the Armstrong Creek development should form a functional part of urban Geelong, these links are not adequately shown in the existing structure plan.

Bus routes in the Structure Plan area will generally be expected to link their catchment areas to the nearest railway station, the major shopping centre proposed for the southern end of the development; and to parts of Grovedale and Belmont.

Theoretically, these links can either be provided by direct routes to those destinations; or by allowing passengers to transfers between services. However, routes that aim to serve all destinations will become indirect and slow when they have to serve multiple destinations in different directions. Experience shows that transfers between routes only work well if services are very frequent. At least in the short term, such high frequency

services are unlikely to be introduced in Geelong. It therefore makes sense to combine some of the major destinations together.

4) Recommendation that the major shopping centre should be located on the Surfcoast Highway next to a station near the existing railway crossing.

It would be a significant advantage to integrate transport and land use planning by providing the major shopping centre on the existing railway line near the Surfcoast Highway (perhaps to the east of the crossing).

While we support the reservation of a public transport corridor towards Torquay, there is a high level of uncertainty over the provision of a rail line to Torquay. There are significant questions about how easily a route to Torquay can be secured, how and in what form services will be provided, and, if the line does go ahead, how soon it is likely to be constructed. As well, extending existing rail services to Torquay along the route proposed may mean that frequent rail services cannot also be provided to the proposed station at Rossack Drive.

Furthermore, even where previous proposals for rail extensions appear to have had the support of the Victorian government (such as the line to the Aurora Estate in Epping North), the extensions have usually not proceeded. Knox City in Melbourne's outer east is another example of a major development in the geographic centre of its retail catchment which is still waiting for fixed rail services to be delivered.

Given these uncertainties, and the fact that a serious feasibility study has yet to be conducted on the proposed Torquay line, the location of a major shopping centre cannot be dependent on a railway line and station being constructed at some unknown time in the future.

As noted above, it would also be easier to provide bus routes in most of the Plan catchment that have only one main focus; the railway station and shopping centre at the Surfcoast Highway / Warrnambool railway line intersection. This station and shopping centre will also be *en route* to the rest of the Geelong urban area.

The rail line to Warrnambool forms a barrier and many routes will need to converge towards the Surfcoast Highway crossing when making their way towards the centre of Geelong.

We acknowledge that our proposed station / shopping centre site is not central to the new development. However, it should be seen in the context of the retail catchment of the wider southern Geelong urban area, for which the site would be a highly accessible location. The centre is also likely to be passed by many residents of the Plan area on the way to central Geelong, which is likely to be a significant employment and recreational destination.

A smaller centre near the proposed rail line to Torquay could be built as a local centre if and when the line is extended, and still provide residents in the southern part of the Plan area with a closer local shopping centre.

5) An objection to the proposed high-standard road link paralleling the Warrnambool railway line, which will impede opportunities for transit-oriented development, and further divide communities north and south of the line.

We do not support the reservation of land for a major east-west road link parallel to the railway line. A dual carriageway road alongside the existing railway will create a significantly wide barrier between the Armstrong Creek development and the adjoining suburbs, especially where the link intersects with the Surfcoast Highway, given that it seems imperative to have a significant road interchange at that point, possibly even grade-separated.

The creation of a wide, noisy and fairly high-speed road link will not encourage pedestrian friendly, high-density, transit-oriented development close to the proposed railway station at Rossack Drive. Even if it simply remains a reservation, there will be a wide corridor of space that cannot be built on, distancing development from the station, and reducing confidence that the amenity of surrounding properties will be preserved.

At its eastern end, the proposed reservation takes the east-west road into the wetlands of the lower Barwon River. This is environmentally damaging, and was one of the reasons (along with a lack of any real demand) that the link was rated poorly by earlier VicRoads studies, and not recommended.

The east-west road is supposed to link the Bellarine Highway with the Geelong By-Pass. As stated above, the demand for such a link is unproven, and it seems unlikely that much road traffic to the Bellarine Peninsula will choose to use such an indirect route (approximately 10-15 kilometres longer than the current road). In fact, the quality and capacity of more direct, alternative access routes from Melbourne to the Bellarine Peninsula, such as Breakwater Road, are already being upgraded at significant expense.

If a connection between the end of the Geelong By-pass and the Surfcoast Highway is needed, the PTUA suggests that a limited-access road could skirt the western and southern boundary of the Armstrong Creek area. This reservation may also define the edge of the urban area more effectively.

6. Need for strong development controls, including use of statutory overlays, to ensure that the Structure Plan is followed.

Strong development controls will be essential if the development is to proceed in the way that the Structure Plan sets out. Experience suggests that many structure plans are treated as mere 'inspirations' for development, and that developers leave out features that they find inconvenient, expensive, or hard to coordinate with other developers and landholders.

Rather than a general requirement not to clash with the vision proposed by the Structure Plan, the planning overlays or special development zoning should specify exactly what the minimum standards are. For example, even if the development of shop-top housing is not mandated, there should be enforceable standards on pedestrian permeability. Public transport corridors and reservations must be mandated and preserved through strong overlays (even through a Public Acquisition Overlay if required).

Thank you for the opportunity to make a submission.

Paul Westcott
PTUA Geelong Branch
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