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Manager
City Development
City of Greater Geelong

Dear Sir/Madam,

Re: Submission on Planning Permit Application 722/02 (Bunnings Complex, Waurin Ponds.)

The Geelong Branch of the Public Transport Users Association (PTUA) wishes to express the following concerns over the proposal for the Bunnings Complex at Waurin Ponds:

- 1) The proposed site has very poor public transport access.
- 2) The proposed complex would increase car use.
- 3) The proposed complex would detrimentally affect traditional hardware shops in existing and more accessible activity centres.
- 4) The proposal goes against the key recommendations of the *Activity Centres Review* for healthy activity centres. This review is a critical part of the Victorian State Government's *Metropolitan Strategy* for Melbourne and Geelong.

The Geelong Branch urges that the application be rejected.

The proposed site has very poor public transport access

The proposed site has very poor public transport access. Currently, only a very limited and infrequent bus service (the Deakin Direct service) runs along the Princes Highway in front of the site. It runs only once every hour, between approximately 9am and 3pm on weekdays, and does not run at all on weekends. Bus services to the proposed site are unlikely to be significantly increased given its location on the periphery of Geelong's urban area.

In any case, it is obvious that the applicant has not taken into account the movements of public transport users in the design of its complex. Indeed, it completely ignores

the planning guidelines which specify that public transport access should be taken into account.

Bus stops and routes are not shown on the site plan, and nor are there any pedestrian links from bus stops to the building entrances. Under the current design, passengers would have to trek across a large and undoubtedly busy car park to get to the buildings from their bus stop. This clearly goes against the recommendations of the *Activity Centres Review (Technical Report 8, June 2001)* ("the ACR"), which recommends that centres should be "designed to provide easy access and attractive approaches to transit interchanges to promote the use of public transport by all groups in the community." (p 159.)

Public transport access is extremely important for the over 900 staff that the applicant estimates are likely to work at the complex. It is not only a critical environmental issue, but also an issue of equitable access to transport. This is particularly so for the (often young) casual workers who will have little choice but to drive a car to work if the proposal goes ahead. The City has recognised the need to reduce car use and dependence in the *Geelong Transport Strategy*, and approving this development would actively work against that goal.

It is also important that customers have access to the site without having to drive a car. While some customers will need to use cars, at the very least those merely browsing or buying small items should not need to drive to the complex. Other customers buying large items often require them to be delivered. The *ACR* notes that "there are relatively few retail uses that genuinely require spacious sites. In most cases, the large sites required are needed for extensive car parking, and so in cities where centres policies are co-ordinated with transport policies to promote mode shift, the force of this argument for freestanding sites is greatly diminished." (p 27.)

The proposed complex would increase car use

The proposed complex would actually increase car use in Geelong. The complex is clearly meant to be a major destination and generator of car trips, providing as it does for almost 900 car parks. Being on the outskirts of the city and away from frequent public transport routes, it is likely to encourage a large number of extra car trips (generating a total of over 1300 vehicle movements in the Saturday peak, as the applicant predicts.) These car trips would often be cross-town trips that would be unable to be served effectively by public transport.

It is particularly concerning that the complex is located almost directly at the end of the proposed Western Ring Road. While the PTUA would like to see public transport dramatically improved before a ring road is considered, if a 'bypass' is to be built, this sort of development would encourage people living along the western side of Geelong to drive long distances along the freeway to get to the complex. This would create the sort of "edge city" development that is the antithesis of Ecologically Sustainable Development. The *ACR* notes that "facilities that generate long distance, cross-corridor travel should be avoided." This is the last sort of development that should be encouraged to occur.

It is disingenuous of the applicant to claim that such a development would reduce car use because it will create a 'one-stop' homemaker centre (*see the report by Essential Economics p 37.*) It certainly provides no evidence or modelling to back up this claim.

In fact, the complex is more likely to form yet another place for prospective customers to visit, and one that is distant from the traditional activity centres in central Geelong (and more recently, the concentration of retail outlets along Melbourne Road in North Geelong.) This is likely to lead to an increase in the length and number of car trips.

Similarly, we reject the assertion made in the applicant's submission that the complex would form a single activity centre with the existing Waurm Ponds Shopping Centre. It is, as the submission acknowledges, more than one kilometre away from the Waurm Ponds Shopping Centre. This is not within a reasonable walking distance and as a result the vast majority of trips between the two areas are likely to be done in cars. By way of contrast to this proposal, the *ACR* recommends that internal structure of Activity Centres should be planned with emphasis on "compactness" and "pedestrian-friendly layouts." (p 28.)

The proposed complex would detrimentally affect traditional hardware shops in existing and more accessible activity centres.

The applicant predicts that the Bunnings Complex would have a 14% negative impact on the business of traditional hardware stores. This represents a very significant impact on the viability of a retail industry where profit margins are already low. The City needs to consider the public benefit in retaining hardware (and other) shops that are accessible by walking, cycling and public transport as well as by driving cars. It also needs to consider the benefits of maintaining (and restoring) the health of existing retail shopping centres in High Street Belmont, Highton and the central city.

The proposal goes against the recommendations of the *Activity Centres Review* for healthy activity centres.

The proposal runs counter to the recommendations in the Victorian State Government's *Metropolitan Strategy*. The Strategy's *Activity Centres Review* explicitly condemns "big box" developments on Highways— just like this proposal – for discouraging walking, cycling and use of public transport, and instead calls for the focussing of retail activity on existing activity centres.

The *ACR* says that growth in superstores and highway convenience retailing has undermined environmental sustainability (*Executive Summary*, p v.), and instead promotes the need for strong activity centres. The benefits of maintaining strong centres include "reduced travel needs, better community access to wide range of services and facilities, provision of a community focus, improved social and economic interaction, better support for public transport services, reduced pollution and more efficient use of land, buildings and urban infrastructure" (*ACR* p 34-5.)

The *ACR* notes on page 132 that:

"...the main pressure point on the viability of the network of centres is the extent of retail and commercial development outside of centres – particularly in the form of large stand alone developments (eg, corporate offices), strings of superstores along main roads, and clusters of highway convenience retailing. These developments are continuing to occur particularly in the middle and outer areas of Melbourne and Geelong, and are affecting the performance of established centres in the network.

What is needed to improve the network is to discourage these forms of development completely. Corporate offices, superstores, and other forms of “big box” retailing encouraged to locate within or adjacent to major suburban centres.”

As a result, the *ACR* recommends the following (p 164):

5.5.5 Strings of Peripheral Sales Outlets and Stand Alone Office Complexes

The policy focus is to discourage this form of development completely. The activities should be encouraged to locate within or adjacent to major suburban centres.

5.5.6 Stand Alone Superstores

The policy focus is to discourage this form of development completely. The activities should be encouraged to locate within or adjacent to major suburban centres.

In the face of weak demand for retail space in central Geelong and Belmont (evidenced by a number of vacant shops and low-value land use like large expanses of at-grade car parking), we also endorse the *ACR*'s recommendations. We recommend that if the applicant wishes to develop a retail outlet, the onus should be on the applicant to find a site in or adjacent to an existing centre.

It is true that the Geelong Municipal Strategic Statement (MSS) does provide some encouragement for big box retailing, and it is criticised by the Review for being a policy framework that “does not provide a comprehensive approach to meeting ESD objectives.” (p 54.) Even so, the largest concentration of recent ‘big box’ development has occurred on Melbourne Road in North Geelong, which at least has a consistent and reasonably frequent bus service (running approximately every 20 minutes on weekdays.) Though still far from transit-friendly, it is also not on the outskirts of the suburban area (as is this proposal.)

The City of Greater Geelong should also note the overseas planning experience outlined in the *ACR* (p 27) in considering this application. We recommend that all ‘big box’ proposals should be subject to similar planning controls in the future:

“In 1997, the Danish government amended the national planning Act to require all urban areas to plan for the siting of retail facilities in locations that promote access on foot, by bicycle, or by public transport. The amendment was motivated by sustainability concerns and was expressly designed to prevent proposed ‘out of centre’ developments occurring...

The 1997 amendment offers an exception for stores selling space demanding goods that cannot be located in centres. But the shops in question must sell only goods of this type, and there is a strict definition, which includes timber, building materials and cars, but specifically excludes food, electrical equipment such as televisions and washing machines,

furniture and hardware (Laursen, 1997). It is clear that most 'big-box' retailing in Denmark will be required to locate in centres."

Conclusion

We urge the city to reject the Bunnings Complex proposal so that Geelong can strengthen its existing activity centres. These centres are more accessible to pedestrians, cyclists and public transport users; and provide greater opportunities to reduce car use and dependence.

Yours sincerely,

Tim Petersen
Convenor
PTUA Geelong Branch