Public Transport Users Association Inc.
Org. No. A-6256L

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Mr Adam Fennessy
Secretary
Department of Environment, Land, Water and Planning
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Dear Mr Fennessy

PTUA SUBMISSION ON PLAN MELBOURNE REFRESH

As the recognised consumer organisation representing passengers of all forms of public transport in Victoria The Public Transport Users Association appreciates the invitation extended on 22 October 2015 by Planning Minister, Hon. Richard Wynne, to respond to *Plan Melbourne Refresh*. This is a welcome opportunity having regard for the significant flaws in the document released by the previous government in 2014 and our submission is attached for your consideration.

We would be pleased to discuss the detail of the submission included at Attachment A at your convenience.

Yours sincerely,

Tony Morton

President

ATTACHMENT A
PTUA SUBMISSION ON PLAN MELBOURNE REFRESH

Introduction

This submission by the Public Transport users Association is focused primarily on the passenger transport needs of the people of Melbourne.

Plan Melbourne, transport and project evaluation

It was asserted in *Plan Melbourne* when it was released in May 2014 by the Napthine government that we would need to increase our reliance on public transport and that we would need to do this to accommodate a projected additional 8 million daily person trips by 2050 on top of the 12.5 million daily person trips today.

Regrettably, the only major committed project by the previous government was the East West Link. This project was based on a flawed business case, threatened to increase car dependency in Melbourne and to absorb the capital funds that *Plan Melbourne* declared to be necessary to provide for significant growth in public transport.

Whilst the East West Link project is now behind us, at least for now, since the election in November 2014 we have been operating in an environment in which transport project decisions are being made without the full assessment of the relative merits of potentially competing projects.

The Ministerial Advisory Committee quite properly criticised the characterisation of the city's 2050 economic structure as an *Integrated Economic Triangle*, primarily defined by sections of the outer freeway/major highway network. We agree with the Committee that the triangle distracts attention away from the key elements of the preferred city structure, a polycentric city and supporting 20-minute neighbourhoods (*Plan Melbourne* 2015 Review. Report of The Ministerial Advisory Committee, p. 17).

The reality is that expanded freeway corridors are no longer regarded by the governors of modern cities that know what they are doing as the "go to" solution for the mobility requirements for their citizens. The main solutions lie with public transport including mass transit on major corridors together with walking and cycling.

Alarmingly, however, the Napthine government's car-centric model of mobility lives on in the one new project of major substance to come to light since the 2014 election. This is the Western Distributor, which had been pitched to the Victorian government by Transurban as an "unsolicited bid." It was not in the mix in the election period and (highly superficial) public consultation on the project has since been "sub-contracted" by the Victorian government to the project proponent. Whilst it is purported to have a mildly positive benefit-cost ratio there has been no attempt to consider the relative merits of alternative projects, especially built around incremental enhancement of rail capacity, to achieve the same objectives as could have been reasonably anticipated with the role assigned to

Infrastructure Victoria. It is particularly apposite in this respect to note that the recent opening of just two new railway stations in the City of Wyndham, at Tarneit and Wyndham Vale, have evidently been responsible for about a 70% increase in rail patronage on Geelong V-Line services.

If it proceeds the Western Distributor threatens to make the fast growing western suburbs more car dependent and to introduce significantly greater volumes of motor cars into the Melbourne CBD and surrounds as well as to stymie long needed initiatives to re-assign container movements to and from the Port of Melbourne from road transport to rail. It may also elbow aside long-identified initiatives for rail services to Melbourne Airport and in the south-east of Melbourne, including to Rowville.

Plan Melbourne and infill development in established suburbs

Consideration is given in the discussion paper to setting a target to deliver 70 per cent of new housing in established areas of Melbourne with 30% in green field growth areas. This is for the purpose of increasing the number of households close to existing transport infrastructure, services and jobs; to reduce the demand for new infrastructure on the urban fringe; and extend the number of years of green fields land supply (*Plan Melbourne Refresh Discussion Paper*, p. 47).

Research indicates that a large proportion of projected demand for residential accommodation to mid-century can indeed be met from the built up city and that rather less of the projected growth in housing previously expected in outer suburbs may be needed (See, for example, Michael Buxton, Joe Hurley, Kath Phelan, *Melbourne at 8 Million: Matching Land Supply to Dwelling Demand* (RMIT University Centre for Urban Research October 2015))

However, insufficient regard has been had for the requirement to improve public transport in middle and inner suburbs where there are clearly identifiable "black holes" in the provision of services. This is not dealt with as seriously as is warranted in *Plan Melbourne*, having regard for the fact that these suburbs are already absorbing significant population growth.

This gap in service provision is poised to become even more pronounced as higher density residential development proceeds in these established suburbs. For instance, tram services serving inner and middle northern suburbs are often heavily overloaded and the frequency of many train services is inadequate. As is the case with much of metropolitan Melbourne existing services are radially based and centred on the Melbourne CBD, with relatively infrequent "across town" services.

The proposed redevelopment of the 16.5 hectare site at the intersection of Chandler Highway and Heidelberg Road in Alphington, which was formerly owned by the packaging company, Amcor, serves as a useful case study of the current failure to integrate transport and land use planning in inner and middle suburban Melbourne.

It is expected that about 2,000 dwellings will be constructed on the site of about 16 hectares with a final resident population of about 4,500. There is also to be significant commercial and retail development of the site which, together with trips by residents, are predicted to generate about 18,000 car trips each day. This forecast is based on the current modal mix of transport trips by residents of the area, which for a location relatively close to the Melbourne CBD is heavily dominated by private motor car travel, and which is anticipated to endure. The significance of the impact on the road network of just this one development can be illustrated by the fact that the two arterial roads that flank the site, Chandler Highway and Heidelberg Road, currently carry about 44,000 and 25,000 vehicles each day, respectively. There are other such developments in the inner north in the Cities of Yarra, Darebin and Banyule, perhaps not of the same scale as the Alphington development individually, but in aggregate will dwarf the Alphington project. The available public transport services are not up to the task.

One regrettable land use consequence of the official expectation that the current paucity of public transport in the area is to endure is that the new dwellings on the Alphington site will be constructed with the on-site car parking capacity of a "car dependent" suburb. This phenomenon has been most commonly associated with outer suburbs, and one which *Plan Melbourne* should be seeking to avoid. Adverse consequences include greater congestion on the road network and the diminished affordability of the dwellings to be constructed because of the requirement to garage larger numbers of cars.

That there is to be no increase in public transport capability in the area was, for practical purposes, confirmed by the absence of Public Transport Victoria from any serious discussion about timely increases in needed public transport capacity during the recent planning approval process.

Significantly, public consultation processes related to the duplication of the Chandler Highway bridge and the widening of the Chandler Highway which is being conducted by VicRoads has been proceeding more or less in parallel with the planning approval process for the redevelopment of the Amcor site. This project was identified by the Ministerial Advisory Committee as a priority project (*Plan Melbourne 2015 Review. Report of The Ministerial Advisory Committee*, p. 44).

PTUA understands that VicRoads has ministerial support for its preferred option for the northern segment of Chandler Highway between Heidelberg Road and Yarra Boulevard to be expanded to six lanes. Again, Public Transport Victoria was effectively absent from proceedings notwithstanding the absence of any north-south route bus services on the Chandler Highway corridor, sub-standard services on the corridor from the northern suburbs to Melbourne CBD, and substandard services on Heidelberg Road.

It could be concluded therefore that the expansion in road capacity contemplated by VicRoads also assumes the continuation of the car dominated transport mix in the area. The prospect for the future is therefore very grave indeed with likely future greater road congestion on the Chandler Highway corridor both north and south of the Yarra River and diminished liveability of primarily residential areas.

This exercise in failed transport and land use planning does not bear repeating in other inner and middle suburbs that are slated for higher density development; a matter that needs urgent attention in this revisiting of *Plan Melbourne*.

Outer suburbs and public transport

PTUA considers that the design of route bus services in outer suburbs and their connectivity with other public transport services (the "network effect") are a significant factor in their level of usage. They should be direct, with an adequate daily service span and adequate frequency and connect with major employment, commercial and transport network destinations. The boost in route bus patronage at Williams Landing on the Werribee line and at South Morang following relatively modest service improvements are testimony to the scope for high public transport patronage in relatively low density suburban locations.

Much of the public discussion associated with transport and urban growth has quite logically been associated with new suburban expansion. There are a number of issues which should be addressed in *Plan Melbourne*. The first relates to the timing of the provision of public transport in newly established suburbs. If reasonable standard public transport services are not available when new suburbs are opened up developers will build residences which cater for anticipated high levels of car use. This increases household costs at the outset. It is also likely to result in greater household costs in the longer term as people, having "invested" in car dependency, continue in that mode.

There have also been cases where new residential developments have been too far removed from higher capacity public transport in outer suburban areas. New developments should be rolled out in an orderly manner to ensure that early development is committed in closest proximity to existing or committed new public transport capacity.

The design of new activity centres in outer suburbs are also far too often predicated on a large proportion of trips being made by motor car. This is incentivised by the provision of large volumes of, typically, open air and free car parking. This is an inefficient use of space and constrains higher numbers of trips being taken by sustainable means. There needs to be an adequate level of intervention to ensure that in the design of new activity centres and the provision of infrastructure that priority is given to sustainable forms of transport. It appears that the design of the activity centre at Mernda, the destination for the extension of the South Morang line, is dominated by car-centric fixed infrastructure.

The design of street networks in new suburbs in the last few decades has too often precluded direct and efficient route bus services. The design of local road networks for ready public transport access should be mandated. Collector roads in particular should be of sufficient width and be readily accessible from the local street network for residents to be able to walk quickly to the nearest bus stop. There are still significant areas of suburban Melbourne without adequate footpaths and that about 18% of bus stops in outer Melbourne are not connected to the footpath network (See http://www.victoriawalks.org.au/pedestrian_infrastructure/) . This means that people do

not feel comfortable and safe walking within the confines of the road network, which triggers greater number of trips by car.

The affordability of locations is commonly expressed in terms of the cost of housing, whether it be owner-occupied dwellings or rental accommodation. However, the price and availability of transport is also a major factor. (See, for example, *The MetroVancouver Housing and Transport Cost Burden Study: A New Way of Looking at Affordability* (MetroVancouver 2015)

Road tolling

Road pricing is increasingly seen as a means to reduce or regulate demand for road capacity and provide for its more efficient use as well as to fund transport infrastructure.

There are two toll roads in Melbourne, CityLink which was opened in December 2000 and EastLink which was opened in June 2008. It is proposed that a third tollway now be built, the Western Distributor, for the ostensible major purpose of removing heavy trucks servicing container terminals at the Port of Melbourne from inner western suburban streets.

No strategy has been enunciated and implemented to ensure that the pricing on these toll roads has the primary purpose of influencing the travel behaviour of road users rather than to generate greater revenue and potential monopoly profits for the concessionaires. In fact, in Victoria, the primary driver appears to have been fiscal, to reduce the call on the public account, rather than to achieve desired transport and land use objectives along with unsubstantiated claims of operational efficiency benefits.

It needs to be questioned how effective a tool road tolling alone can be because of the incentive it provides for the diversion of less time sensitive road users to other corridors on the road network. This has the potential to adversely affect planning objectives. There is also the more directly political concern that authorities, immensely grateful to concessionaires for relieving their perceived budgetary difficulties, accept conditions in concession agreements that make it more difficult to meet medium to longer term challenges in transport networks as they arise. In this environment governments may find it more attractive to fund a transport mode more amenable to this funding model even in circumstances which lead to much poorer transport and land use outcomes including further diminution of the role of public transport.

This is now much more of a threat in Victoria where one operator has been granted considerable authority over the design, construction and operation of Melbourne's road network.

Car parking policy

The Ministerial Advisory Committee recommended the reduction of statutory car parking requirements where affordable and social housing is being provided, especially in areas with

ready access to public transport (*Plan Melbourne 2015 Review. Report of The Ministerial Advisory Committee*, p. 40).

There are good grounds for broader consideration to be given to eliminating or reducing minimum parking requirements in local planning schemes on the grounds that they unnecessarily stimulate demand for private passenger vehicle trips and for road capacity to the detriment of positive land use outcomes. To avoid spill over effects this would have to be undertaken on a metropolitan-wide basis. Evidently, there are also problems with quasi-judicial interpretation of current requirements for car parking which is resulting in meritorious residential projects with diminished car parking requirements being put at risk (See, for example, Clay Lucas, "Green building with no car parking thrown out by VCAT for having no car parking," The Age, 23 October 2015)

Under current regulatory arrangements there is also too much of an incentive for the taking of long car journeys for shopping and other purposes due to such phenomena as large format or "big box" shopping centres, typically located on freeways and with large volumes of car parking available free to customers, but well removed from public transport. This phenomenon is reducing the economic viability of local shopping and other commercial centres and it is a threat to the concept of a "twenty minute neighbourhood."

There is no specific reference to the impact of large format shopping centres in *Plan Melbourne*, which are understood to be responsible for a growing share of retail turnover, possibly now about 20%, and growing. Their role should be addressed in *Plan Melbourne* because of their potential impact on the geographic distribution of retail trading, including their impact on the concept of the "20 minute neighbourhood." Assessment should also be made of whether these businesses are operating with an unfair advantage under current planning regulations.

Building resilience to climate change

The *Plan Melbourne Refresh* discussion paper recognises that Melbourne should move towards a low carbon future by shifting to low-emission transport modes, the greening of the city and implementing other resource and urban management initiatives to maintain its liveability.

The private motor vehicle is an inherently inefficient means of transport, which is exacerbated by very low vehicle occupancy rates of about 1.1 persons. Greenhouse gas emissions from road motor vehicle use in Australia has been stable for over a decade at about 4 tonnes per capita per annum, with passenger cars accounting for nearly half of these emissions. Factors influencing aggregate greenhouse emissions during the period include relatively stable distances travelled per capita, increased fuel efficiency of the motor vehicle fleet, relatively stable fuel prices since about 2006, and population increase.

Given prospective population growth, however, and the current modal mix, there will continue to be upward pressure on aggregate greenhouse gas emissions.

The single greatest potential contributor to reducing greenhouse gas emissions in transport is an increase in the proportion of trips by public transport to other sustainable transport forms. It would be appropriate to enunciate targets should be enunciated in *Plan Melbourne* to provide necessary impetus for the necessary program initiatives to achieve mode shift.

Place making and public transport infrastructure and services

The Ministerial Advisory Committee is highly critical of the deletion of place making in *Plan Melbourne* and has recommended the re-introduction of a chapter on Place and Identity (*Plan Melbourne* 2015 Review. Report of The Ministerial Advisory Committee, p. 83). PTUA endorses this recommendation.

There are several elements of public transport service provision and infrastructure that need to be enhanced to improve place making. These are often associated with the connectivity between different modes of public transport. They are also important for the way that people move within specific localities. It is particularly important for the idea of the 20 minute neighbourhood.

There are powerful space efficiency imperatives for preferencing as many local connections by walking and cycling to public transport rather than the private motor cars. These same imperatives also point to connecting bus services as a superior connection to rail services relative to the private motor car for those who have to travel further to their local railway station.

In Melbourne, high proportions of train, tram and bus users connect by walking. Lower proportions connect by cycling. These figures could all be improved in particular locales with improvements in pedestrian and cycling oriented design and higher frequency route bus services.

Unfortunately, however, there are attempts to build impetus to invest in car parking at suburban railway stations, whilst insufficient attention is being paid to improve walking, cycling and route bus connections at local train stations (See Adam Carey and Clay Lucas, "Build multi-story car parks at stations to encourage train travel, Metro says," The Age.com.au, 27 July 2015).

Metro and RACV are reportedly supportive of increased car parking at railway stations. This followed the recent construction of a car park at Syndal station on the Glen Waverley line which now offers free parking. It is notable that the car park, which cost over $10 million to construct will cater for just 250 cars whilst the station handles 2,500 passengers a day. *Plan Melbourne* should recognise that it is much superior to provide connectivity with rail services by sustainable means rather than by motor car through the provision of car parking.

Grade separation projects are discussed little in the report by the Ministerial Advisory Committee and are not referred to at all in the *Plan Melbourne Refresh* discussion paper

(October 2015). This is a major omission as grade separation of rail and road corridors undertaken with superior urban design and place making objectives in mind substantially enhance potential returns from local commercial activity and for residential development in the precinct.

Arguably a major opportunity has been lost with the grade separation of the rail line with Blackburn Road in Blackburn by undergrounding the railway line rather than elevating the line without regard to the significant potential for commercial and residential development to the north and south of the railway line.

If grade separations and similar projects at transport nodes are approached with the primary objective of freeing up road traffic to the practical exclusion of other objectives they put place making at serious risk. This should be given explicit recognition in *Plan Melbourne*.

A different set of considerations exist with the redevelopment of the Frankston station and the adjacent precinct. The activity centre, which has been economically depressed for years, and is beset with social difficulties which play out in the area, is dominated by motor car traffic. The redevelopment of the railway station at Ringwood, a notoriously isolating precinct for years, has made some effort to incorporate the station precinct into the adjacent Eastland shopping centre that has also been recently redeveloped. In other instances, access to public transport has been compromised by the provision of indirect routes to public transport vehicles, most notoriously at Melbourne Central where the major objective of the "planners" appeared to be to expose commuters to as many retail shop fronts as possible on their lengthy journey to rail platforms.