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Ms Mandy Elliott
Department of Sustainability and Environment
PO Box 103
GEELONG VIC 3220

Dear Ms Elliot,

Re: Comment on the Draft Scoping Guidelines for the Geelong Bypass EES

The Geelong Branch of the Public Transport Users Association (PTUA) would like to submit the following comments on the Draft Scoping Guidelines for the Geelong Bypass (Section 3) EES:

1) Our dissatisfaction with the assessment of only one section of the Geelong Bypass Project, which would appear to prevent an assessment of any alternatives to the project as a whole.

2) The need for the EES to clarify:

   a) The predicted impacts of the bypass on current through-roads such as Latrobe Terrace and Melbourne Road; and
   b) What the purposes of the bypass are; and how any conflicts between those purposes are intended to be resolved.

3) The need for specific guidelines for assessment of the bypass' impacts on:

   a) Demand for inappropriate peripheral residential, rural residential and commercial development, and recommendations on managing this;
   b) Car dependence in existing and future suburbs in southern Geelong and the Surf Coast, and a risk assessment of the social and economic impacts of higher future oil prices; and
   c) The viability of existing or possible future public transport services in southern Geelong and the Surf Coast;

4) We also draw your attention to studies on "induced" or "generated" traffic and request that the effects of such travel be specifically included in guidelines for the assessment of greenhouse gas emissions.

Further Information

1) Dissatisfaction with the EES for Section 3 only

We take this opportunity to express our dissatisfaction at the Minister's decision to require an assessment of the environmental effects of section 3 only. This would appear to prevent an assessment of alternatives to the project as a whole, and means that any alternatives to Section 3 would still have to assume that the first two sections would be constructed.

We believe that improved public transport (and travel demand management measures) could make a significant contribution to reducing the pressure on existing roads through Geelong, given that the vast majority of residents and visitors currently have no realistic alternatives to driving. We note that no alternatives to building roads (apart from the "do nothing" option) have ever been rigorously, transparently and independently evaluated. The Geelong Ring Road Strategic Study (pp 88-89) dismissed improved public transport as (even part of) an alternative in less than two pages because it predicted a continued increase in car travel (presumably on current trends) and simply assumed that the predicted extra travel needed to be provided for.

2) The need for the EES to clarify:

a) The predicted impacts of the bypass on current through-roads such as Latrobe Terrace and Melbourne Road;

There seems to be some confusion within the community over what impacts the bypass will have on reducing the level of traffic on roads within Geelong. There are suggestions that for much of the week, traffic on existing roads will remain approximately at current levels or continue to increase on roads such as Latrobe Terrace and Melbourne Road (p. 72 *Geelong Ring Road Strategic Study*).

An assessment by the EES of what it might take to actually reduce traffic on roads such as Latrobe Terrace (*eg* during Geelong's morning and evening peaks) might help to clarify community confusion on the issue and allow more informed decision making in the future.

b) What the purposes of the bypass are; and how any conflicts between those purposes are intended to be resolved.

There is some confusion in the community about what the purposes of the bypass are. The name 'Geelong *bypass*' suggests that it is meant for through-traffic to places such as Colac, Torquay and Warrnambool to bypass suburban Geelong; and yet the 'bypass' is clearly also designed to support traffic from residential areas in and immediately around suburban Geelong.

There is significant potential conflict between these purposes, particularly if traffic congestion occurs on the road in the future. An EES should outline how these potential conflicts are intended to be resolved so that those effects can also be considered in the EES process (and so that the community can be informed).

3) Need for specific guidelines on the assessment of the bypass' impacts:

a) Demand for inappropriate peripheral residential, rural residential and commercial development, and recommendations on managing this;

We believe that the bypass would increase pressure on planning authorities to approve inappropriate peripheral residential, rural residential or commercial development designed for access from the freeway. This could be a significant threat to a public transport-friendly urban structure, and would also encourage more traffic to use the bypass unnecessarily.

While we note the Draft Scoping Guidelines 4.6.6 provide a general section on *Land Use and Planning*, we believe this threat is significant enough to warrant specific mention and require an assessment of the strength and adequacy of existing planning policies.

b) Car dependence in existing and future suburbs in southern Geelong and the Surf Coast, and a risk assessment of the social and economic impacts of higher future oil prices;

We note that the City of Greater Geelong and Surf Coast Shire are expecting significant residential development to occur between the Surf Coast and southern Geelong as a result of the construction of the bypass (see eg 'Shire braces for ring road impact', *Geelong Advertiser* 9/6/04 p. 3). Much of this development will only become possible thanks to reduced travel times to employment centres in northern Geelong and Melbourne, meaning that residents will be dependent on driving long distances daily along the bypass and other roads.

Car dependence has been linked to isolation and disadvantage for people who cannot drive as well as reduced physical activity and obesity among the wider population. Furthermore, the prospect of oil price rises in the medium-long term poses significant social and economic risks to individual car dependent households and the wider community (eg through the effects of reduced disposable incomes on businesses.) We believe that the EES should assess those risks and ways of managing them (ie ensuring that less energy and greenhouse gas-intensive forms of transport are available and can be easily substituted for car travel.)

c) The viability of existing or possible future public transport services in southern Geelong and the Surf Coast,

Providing residents and tourists with quicker access to Melbourne or northern Geelong by car than they can get by catching public transport (ie taking a bus or even driving to their nearest railway station) will make public transport a relatively less attractive option. This is likely to reduce (existing and potential) public transport

patronage and detrimentally affect the viability of existing or future public transport services.

It was claimed in the Geelong Ring Road Strategic Study (p. 89) that:

> Geelong's public transport services serve a radial transport demand, while the ring road options would serve a circumferential travel demand. This means that ring road options would serve a complementary travel demand market to the current public transport market.

However, this is incorrect. For example, a trip from Torquay or Grovedale to Melbourne (which by car is likely to be done by the bypass) is in fact radial in character; and could be done by catching a train to Melbourne from Grovedale. Therefore, the bypass will not be complementary but will actually compete with some transport markets.

The impacts on the viability of current or potential public transport services therefore need to be properly assessed as part of the Environmental Effects process. (See also ANZECC Criteria 2- Impacts of Proposals: Question 3: *Will the proposal significantly divert resources to the detriment of other natural and human communities? Including access to services and infrastructure; and opportunity costs/options foregone*).

4) Induced or Generated Traffic

'Induced' or 'generated' traffic has been recognised as a phenomenon by many bodies including the UK Department of Transport's 'Standing Advisory Committee on Trunk Road Assessment' (SACTRA) in its 1994 report *Trunk Roads and the Generation of Traffic*. This means that there is a "feedback" effect: when a new freeway is built; people respond to it by transferring journeys from more environmentally-friendly transport modes to cars and driving further and more often. They can also respond to land use changes *eg* by driving to new freeway-oriented retail facilities. This increase in kilometres travelled is usually well beyond the rate of population growth.

Any EES assessment of greenhouse gas emissions needs to take into account that while the fuel used to make existing trips may be reduced, the overall effect of providing the freeway may be to encourage the making of more car trips. This can result in a total increase in fuel use and associated greenhouse gas emissions.

Thankyou for the opportunity to make a submission.

Yours faithfully,

Tim Petersen
Convenor, Geelong Branch
Public Transport Users Association (PTUA)