

## **Moreland Bicycle User Group (Moreland BUG) Letter of Objection for Permit Application MPS/2020/260**

Proposed Development Address: 145 Glenlyon Rd, Brunswick VIC 3056

Advertised development description:

Use of the land for trade supplies and restricted retail premises (Bunnings), buildings and works including the construction of a two-storey building with mezzanine, display of signs, reduction in the bicycle requirements and creation of an easement.

### **Objector Details:**

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Contact:	Faith Hunter (Secretary)

Moreland Bicycle User Group (Moreland BUG) is a community organisation run by volunteers that has been advocating for safer bike riding in Moreland for thirty years. Our objection to the proposal is based on the detrimental effect the proposal will have on the bicycle network in Moreland, the increased risk it presents to riders already using the network and the detrimental effect the proposal will have on Moreland Council's efforts to increase active transport in Moreland.

**We request that Council reject this planning permit outright, as a Bunnings store in this location presents an unacceptable danger and risk to people using bicycles in this area of Moreland, is incompatible with maintaining existing levels of cycling in this part of Moreland or increasing those levels as expressed in the Moreland Integrated Transport Strategy (2019)**

## Reasons for objection

**Moreland Bicycle User Group objects to the proposed Bunnings store at 145 Glenlyon Rd for the following reasons:**

**1. The proposed Bunnings store and associated volumes of visitor traffic pose an unacceptable risk to people on bicycles using the bicycle lanes on Glenlyon Road.**

Glenlyon Road is part of the Victorian State Government's Principal Bike Network and the painted bicycle lanes on it provide a significant and strategic east-west bicycle route in Moreland which is used independently by people from thirteen years upwards and by younger children as passengers on adult's bicycles.

The most recent Super Tuesday bicycle count conducted in March 2020 identifies 113 people moving east or west on the Glenlyon Road bicycle lane adjacent to the proposed site between 7-9am. The bicycle lane is well used throughout the rest of the day in particular by people accessing Brunswick Secondary College, Brunswick Library, RMIT, Brunswick Baths, Sydney Road and other community destinations. The weekend sees additional recreational riders using the bicycle lanes. The Glenlyon Road bike lanes provide important connections to other strategic cycling routes such as Ewing St, the East Brunswick Shimmy (and from both of these the CCT) and the Merri Creek Shared Path.

All staff and customer vehicles accessing the 250 car parking spaces proposed by Bunnings will have to cross the bicycle lane on the north side of Glenlyon Rd to access the crossover. The Traffic Impact Assessment by TTM uses a survey undertaken at Fairfield Bunning's store for guidance on likely traffic generation at the site. The survey identified 379 traffic movements on a Saturday between 1 and 2pm. This volume of traffic crossing the bicycle lane poses a very serious and unacceptable risk to people in the bicycle lane.

In addition to the risk to people on bicycles created when drivers cross the bike lanes the additional traffic created by locating the Bunnings store at this site poses other risks to users of the Glenlyon Road bicycle lanes.

The Traffic Impact Assessment by TTM analysis claims that the queue lengths along the western leg of Glenlyon Road will be up to 64 metres during the weekend lunchtime period and will therefore not hinder vehicle access to the staff and customer parking crossover.

This is completely at odds with the experience of people riding along Glenlyon Road who already experience queues of vehicles backed westwards from the intersection of Lygon and Glenlyon sometimes as far back as Ewing St, and regularly as far as Minnie St. Traffic Volume Data from VicRoads Opendata indicates that the existing traffic volume averages are higher than those cited in the TIA report with an average on a Saturday between 12 and 1pm of 398 in contrast to the figure of 355 cited by TTM. The weekday peak is similar, rising to 409 on Fridays between 5-6pm. These

figures confirm what people using the bicycle lane report, that the current queuing is much worse than cited by TTM.

Additionally, the TTM report makes no allowance for the impact of the traffic generated by Bunnings on these queues.

Currently at the intersection of Lygon and Glenlyon over 50% of vehicles turn either left or right and riders already experience difficulty here with the bicycle lane ending so that a left slip lane can be provided. The risk to riders approaching this intersection will only increase as the queues increase, with impatient drivers tempted to use the bicycle lane to access the slip lane, or queue across the bicycle lane as they attempt to manoeuvre out of Minnie St or Bunnings.

As westward drivers queue behind vehicles waiting to make a right-hand turn into Bunnings, they will be tempted to use the bicycle lane to pass those vehicles on the left, putting people using the bicycle lane at additional risk.

## **2. The proposed Bunnings store and associated volumes of visitor traffic pose an unacceptable risk to people on bicycles using Lygon Street.**

Lygon St is an important cycling route in Brunswick, heavily used by commuters on bicycles to move south towards the city in the morning and return north in the afternoon. The most recent Super Tuesday bicycle count conducted in March 2020 identifies over 200 people moving north-south on Lygon St between 7-9am

In addition to a through route Lygon St north and south of Glenlyon Road is a shopping precinct with a high degree of public and active transport as identified in MITS and the Bunnings Planning Report by Metropol. The Brunswick Structure Plan 2010 asserts that “Car traffic undermines the identity and function of the Lygon St Activity corridor as a social and economic space” The report by Metropol identifies the requirement expressed in Clause 18 of the SPP that sustainable modes of transport such as walking and cycling are to be encouraged by creating environments that are safe and attractive but the response does not address the ways in which the traffic generated by the proposed Bunnings store will negatively impact the existing bicycle networks in the area.

The proposed Bunnings store and associated increase in volumes of traffic pose an increased risk to vulnerable road users using Lygon St, where there is no bicycle lane.

Lygon St in the southern end, the area Bunnings is proposed, is identified in the MITS (2019) as a hotspot for crashes between motor vehicles and cyclists. The Lygon St corridor is already overrepresented for incidents between vehicles and cyclists as well as crashes which resulted in serious injury. The proposed Bunnings store and the traffic generated by it will only exacerbate this situation.

## **3. The proposed Bunnings store and associated volumes of visitor traffic will increase rat running and put riders using back streets at risk**

Minnie St, Evans and Albert Streets are low traffic roads heavily used by people on

bicycles to make their way through Brunswick. The additional congestion created on Glenlyon Road and at the Glenlyon/Lygon Streets intersection will encourage drivers to use these streets as a 'rat run' increasing the risk for riders on these streets.

**4. The heavy vehicle traffic associated with the proposed Bunnings store poses an unacceptable risk to people using bicycles on both Glenlyon Road and Lygon St.**

The Traffic Impact Assessment by TTM included in the Application for the proposed Bunnings store describes 19m semi-trailers and a large proportion of 12.5-meter-long rigid trucks accessing the site.

All of these heavy vehicles will access Bunnings from Glenlyon Road, crossing the north-side bicycle lane as they do. They will pose a significant risk to people using both north and south side bike lanes due to the greater turning circle required by the vehicles (potentially causing them to swing wide into the south-side bicycle lane) and the limited visibility drivers of these vehicles have, particularly of vulnerable road users such as those on bicycles.

The application by Bunnings describes delivery and waste vehicles, which will include the 19m semi-trailers and 12 m trucks, accessing the site from 7am onwards. This will place heavy vehicles on Glenlyon Roads and Lygon St during the morning peak hours 7-9am when bicycle use on these routes is at its highest.

These heavy vehicles will exit Bunnings via Pitt St.

Loyola Avenue and Pitt St are a route favoured by people on bicycles heading northwards to avoid the Glenlyon/Lygon St intersection and in particular the left turning slip lane. This is a route that particularly appeals to people riding with their children. The presence of so many heavy vehicles in Pitt St is incompatible with the safety of these people.

From Pitt St heavy vehicles will turn right onto Lygon St, where vulnerable road users will be at increased risk. Lygon St in the area Bunnings is proposed, is identified in the MITS as a hotspot for crashes between motor vehicles and cyclists. The Lygon St corridor is already overrepresented for incidents between vehicles and cyclists as well as crashes which resulted in serious injury.

Heavy vehicles such as these described accessing Bunnings as part of its day to day operations are over-represented in cyclist deaths in Australia:

The presence of these heavy vehicles on Lygon St sharing contested space with a tram network, shopping precinct, car parking and active transport users is incompatible with the objectives for the Lygon Street Activity Corridor described in the Brunswick Structure Plan. Lygon St will be furnished with accessible trams stops in the future, and the presence of this volume of truck traffic undermines these plans.

The intersection of Lygon and Glenlyon is already a hot spot for accidents between motor vehicles and cyclists. The presence of this volume of turning heavy vehicles at

the intersection of Lygon and Glenlyon Road will have an adverse impact on cyclists crossing or turning at the intersection due to the extra space these vehicles require when making turns and in particular due to the constraints on the driver's view of the road and other road users in these vehicles.

### **5. The car parking requested is excessive and the bicycle parking proposed inadequate**

The Traffic Impact Assessment report by TTM identifies the number of parking spaces required by Moreland Council Planning Scheme as 76 but proposes to provide 250 spaces on the grounds that many of the goods sold at Bunnings are too large to be conveniently transported by anything other than a motor vehicle.

Most of the goods sold at Bunnings are smaller items easily transported on a bicycle. A survey by Moreland BUG conducted between 8-13 September 2020 found that of 183 respondents, 83% use a bicycle to purchase hardware and nursery items when practicable.

The volume of parking requested by Bunnings is incompatible with the aspirations of Moreland Council for the Brunswick Activity Centre with respect to active transport. This amount of car parking and the traffic they expect places them at odds with the existing nature of the area and the planned future for the area.

The bicycle parking required by Moreland Council reflects the aims expressed in MITS of increasing active transport.

Many people in Moreland make use of cargo bicycles of various styles and bicycle trailers when shopping and are easily able to transport larger nursery, timber and hardware items by bicycle. The Moreland Integrated Transport Strategy suggests bicycle parking should be designed to accommodate cargo bikes and trailers of different styles and there is no provision for these in the existing plan.

At least 7% of people living in Moreland travel to work by bicycle and 19% of people living in Moreland also work in Moreland. If the Bunnings proposal is to have any employment benefits for those living in Moreland it is reasonable to expect that a significant number of those employees will arrive by bicycle.

### **6. The proposed Bunnings Store is inconsistent with the Moreland Integrated Transport Strategy (2019)**

MITS (2019) has the following aims, all of which are undermined by the proposed development in this location:

- Combat the negative effects of growth by helping more people move around the city without their car so those who need to drive are able to do so.
- Make better use of our public road space and prioritise public transport, walking and cycling to make travel more reliable and reduce the impacts of congestion.
- Provide facilities which allow people to choose to walk or cycle more often and increase their levels of incidental and recreational exercise.

In particular MITS aims to;

- Protect our local streets from the impacts of increasing vehicle traffic.
- Prioritise access by walking, cycling and public transport over car-based travel.
- Make cycling safe, comfortable and a preferred mode of travel in Moreland.
- Encourage local trips to jobs, services and facilities by walking and cycling

All of these aims are threatened by the granting of this application and the increase volumes of traffic associated with it. In particular, the presence of the additional heavy vehicles described in the application, means that protective measures such cyclist priority at traffic lights and separated bicycle lanes will have a very limited effect against the detrimental impacts of the application.

MITS (2019) also states “From a cycling perspective, safety was identified as the most significant concern, particularly in the south of Moreland”. The location of the Bunnings store at this site exacerbates this concern.

### **Negative impact of the proposal**

**The advertised proposal will have a negative impact on people in Moreland who use a bicycle to get around and will deter those who don't yet ride, from this mode of active transport:**

- by increasing risks to people of all ages using the bicycle lanes on Glenlyon Road, or riding on Lygon St.
- by increasing the risk to riders using local back streets whether through the presence of heavy vehicles or by encouraging motor vehicle drivers to rat run.
- will substantially increase the perception of risk associated with riding a bicycle in the area, discouraging people from taking up using a bicycle and encouraging people already riding to use private motor vehicles instead.
- will lead to greater congestion, (both through the traffic the store will generate, and the additional traffic generated as people abandon bicycles as a transport mode in the area) undermining the rideability of the southern part of Brunswick.
- will instigate a severance effect as described in MITS (2019) and create a break in the local cycling network.
- stymies community aspirations for the Glenlyon Road bike lanes to be upgraded to be separated from traffic, as Moreland Council identifies is the preference for this type of road.
- has a negative social impact, impacting the health of residents who will be adverse to using bicycles on congested roads in the presence of additional heavy vehicles.

It is with these concerns for the safety of people choosing to get around by bicycle in and through Brunswick and the failure of this proposal to meet the intentions of the Moreland community, in particular as expressed in MITS (2019), that Moreland Bicycle User Group object to the issuing of a Permit for the proposed Bunnings at 145 Glenlyon Road, Brunswick.

Kind regards,

Faith Hunter  
Secretary – Moreland Bicycle User Group

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