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07 July 2021

Hon. Richard Wynne
Minister for Planning
Level 16, 8 Nicholson Street
East Melbourne Vic 3002

Via engage.vic.gov.au website & email: richard.wynne@minstaff.vic.gov.au

Dear Minister Wynne,

SUBMISSION: DRAFT CENTRAL GEELONG FRAMEWORK PLAN

Please accept the following as the Committee for Geelong's submission to the Central Geelong Framework Plan consultation process. I submit this on behalf of the Committee for Geelong, both as representing views of the membership of the Committee for Geelong, with specific reference to commentary via member organisations: the City of Greater Geelong and the UDIA Vic, as well as feedback received during our recent member briefing series 'The Future of Central Geelong.'

ABOUT THE COMMITTEE FOR GEELONG

For 20 years, the Committee for Geelong has provided strategic leadership and influence to leverage the economic and social prosperity of the Geelong city-region. An independent, non-partisan, membership-based, not for profit organisation, the Committee for Geelong works collaboratively with an authoritative group of stakeholders and influencers to design Geelong's best future.

The following submission includes a range of requests that we ask to be considered prior to the finalisation of the Plan.

SUBMISSION

Overall, the Committee for Geelong is generally supportive of the intent of the Central Geelong Framework Plan (CGFP) and corresponding planning controls.

GEELONG IS GROWING FAST / IMPACT OF COVID ON CITIES

Prior to COVID and now fueled by trends related to the pandemic, the greater Geelong region is one of the fastest growing cities in the country.

Residential growth is booming and property prices are escalating in the Geelong region. The increase in migration from Melbourne to the Geelong region has been clearly documented with Geelong recording the third highest net migration figure in Australia.

"More than 9100 people left Melbourne and moved to Geelong in the 2019-20 financial year, with a total of 15,000 Australians choosing to relocate to the region. ABS data shows around 10,700 people left Greater Geelong leading the area to record a net internal migration of 4977. The region recorded the third highest net migration figure in Australia behind Gold Coast and the Sunshine Coast. It was



the only region in the top five not in Queensland.

<ref: Geelong Advertiser, 16 June 2021 [Geelong migration equal to Melbourne population loss | Geelong Advertiser](#) >

With the opportunity for people to choose to live in Geelong and work from home on a more regular basis, we believe that this strong level of population growth will continue and must be supported by a vibrant CBD.

The impact of COVID-19 on the purpose and function of the Geelong CBD, and on cities across the globe, is profound. In a recent opinion piece from the Committee for Geelong, and prior to the release of the CGFP, these issues and opportunities were highlighted.

The following trends and data provide food for thought:

- *More people are predicted to continue to work from home than prior to the pandemic.*
- *International data predicts that over twenty per cent of office workers will continue to work from home in some capacity. Prior to the pandemic, this figure was five per cent.*
- *As less people commute to CBDs, office space demand is predicted to decline. While office spaces are currently reinventing floor plans to ensure that social distancing is complied with and the need for private offices brought back into focus, the demand for office space will lessen.*
- *Consumer spending in the CBD will decrease, with some research stating the decline to be somewhere between five and ten per cent against pre-pandemic levels.*

CBDs are vital parts of our community and perform value-added roles including agglomeration, entertainment, cultural experiences, and larger-scale social interaction. However, we now need to re-vision our CBDs, and design healthy, sustainable environments for people to live, work and play in. There will be a need for mixed use spaces, co-working in cafes and hubs, spaces with fresh air and room to walk outside, and more green spaces.

<link to full article [CBD must adapt to life after pandemic - Committee for Geelong](#)>.

In a recent article published by ABC News it was stated that

“The pandemic has changed our tolerance for office work. Surveys show up to 70 per cent of employees will seek new jobs if their employer does not offer flexibility to work from home some of the time.” [Open-plan office noise increases stress and worsens mood: we've measured the effects - ABC News](#)

We need to acknowledge and understand these trends and incorporate into supply and demand models and also encourage and incentivize developers and landlords to look at new ways to create flexible working environments.

The much-anticipated draft Central Geelong Framework Plan is one piece of the puzzle in ensuring that our city maintains its liveability and vibrancy as we reflect our resilience in the face of the pandemic.

The Committee for Geelong would also like to submit that there are several other policy and projects that are currently underway in Geelong that are important when considering the CGFP.



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1. The Geelong City Deal

The Geelong City Deal was announced several years ago and includes multiple projects of relevance to Central Geelong including the Green Spine – a project that was realized through the Vision 2 process (a Committee for Geelong instigated project). The Geelong City Deal has projects that directly impact and inform the built environment in the Geelong CBD. For the purpose of this submission, we wish to express our strong interest in being further engaged regarding the planning, design and development of the Geelong Convention and Exhibition Centre (GCEC).

The opportunity for the Geelong waterfront to be transformed through this significant project must be realized. Local stakeholders wish to be engaged to provide input into the opportunity for the GCEC to not only deliver on the provision of space for conferences and exhibitions but to be an exemplar of design and an architectural attraction in its own right. How the city responds and benefits from such a significant investment needs to be realized with the private sector also engaged to add value to the public investment. This level of engagement has not occurred to date.

2. Revitalising Central Geelong Action Plan - refresh

The Committee for Geelong is currently heavily engaged in consultation regarding a refresh of the Revitalising Central Geelong Action Plan. The Action Plan provides a unique opportunity to begin building on the actions needed to support the successful implementation of the CGFP. For example, while the CGFP does not provide detailed guidance regarding public transport and freight movements in the CBD, a key project for the RCG Action Plan should be to seek funding and develop a public transport plan for the metro Geelong area and leverage the billions of dollars invested into Geelong Fast Rail including the duplication of the line between Waurn Ponds and South Geelong. This work will need to include a solution to the single tunnel that connects South Geelong and Geelong Train Station.

The Committee for Geelong recommends that the key initiatives referenced in the CGFP be aligned and help inform the work of the RCG Partnership, including the allocation of funding streams to support delivery and implementation.

3. UNESCO Creative City of Design designation

The City of Greater Geelong was successful in gaining a UNESCO Creative City of Design designation in 2017. This provides a unique and compelling opportunity for Geelong to position itself globally. As a city of design, we strongly support the CGFP's intent to preserve the natural amphitheatre of our north-facing bay and ensure that building heights do not unnecessarily obstruct views to Corio Bay. Geelong was carefully designed on a Hoddle grid with wide streets to maximise bay aspects. As referred to earlier, there needs to be specific reference to design excellence in the built environment to acknowledge our UNESCO designation. This includes leveraging the public investment in the GCEC on the waterfront as a design exemplar.

4. The Geelong Authority

The first CEO of the Committee for Geelong, Mr Peter Dorling was the inaugural Chair of the Geelong Authority. With new Geelong Authority Chair Diana Taylor now in place, we are aware of its Terms of Reference being reviewed. The Committee for Geelong is in regular engagement with



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the Geelong Authority, in particular via the RCG Action Plan refresh. We request that work of the CGFP takes into consideration, and recognizes, the unique circumstances in Geelong for developers progressing through the planning permit application process. We ask, as the Geelong Authority's Terms of Reference is reviewed, that regular engagement, invitations to brief and be briefed, and specific reference to the Committee for Geelong as a significant stakeholder be included. This will assist us in supporting and informing our members, and the Geelong community, in navigating the complex planning processes as we design our city for the future.

5. Regional Integrated Transport Strategy

The Committee for Geelong is working with G21 Geelong Region Alliance on the development of a Regional Integrated Transport Strategy. This strategy has been informed via a briefing paper developed by the Committee for Geelong - submitted to RDV & Department of Transport BSW - and was also included in our submission to the Principal Freight Network consultation. <link [201218-Principal-Freight-Network-submission-Committee-for-Geelong-18DEC2020.pdf \(committeeforgeelong.com.au\)](#)>

While this Regional Integrated Transport Strategy is important, we cannot lose focus on the transport planning needs for the Geelong CBD.

Further, the Committee for Geelong agrees with the City of Greater Geelong in its submission to the CGFP, that the development of the CGFP has relied on the Transport Network Operating Plan released in late 2019 which was not endorsed by the City of Greater Geelong.

"the Transport Network Operating Plan (TNOP) that was not endorsed by Council, including proposed changes to freight routes that fail to address level rail crossing issues broadly, and in particular at McKillop Street...<has> A failure to address longstanding issues with bus movements, bus interchanges and bus stop locations within Central Geelong, which continue to negatively impact retail and public realm amenity on Moorabool Street, as well as limiting alternative transport options more broadly across the region; A failure to adequately address the Geelong railway station, rail and bus connections within Greater Geelong, and the exclusion of a future rail link to Avalon Airport." <ref: City of Greater Geelong, CGFP submission – 22 June 2021>

For reference – the Committee for Geelong made a submission to the City of Greater Geelong's Transport Network Operating Plan in January 2020 [Committee-for-Geelong-Transport-Network-Operating-Plan-submission-COGG-2-Jan-2020-FINAL.pdf \(committeeforgeelong.com.au\)](#). Some key comments from that submission which we believe has relevance to the CGFP include:

"In the Geelong community's Clever and Creative vision, there is an aspiration for A Fast, Reliable and Connected Transport Network. Within that aspiration there is a measure of success that outlines a future where 50 per cent of journeys to work are made by public transport, walking or cycling."

"Apart from short walking and cycling trips, public transport is the key alternate transport option to private vehicle use into the Central Geelong area. Beyond rail and regional ferry services, all public transport within Geelong shares the road network which highlights the lower order priority that public transport plays in our road networks."



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“According to the data outlined in the draft Transport Network Operating Plan, all people who travel to work to Central Geelong from a four to six kilometre radius, 92 percent travel by car with five percent choosing to use public transport (three percent cycle to work). This clearly shows there is a considerable public transport challenge facing us.”

“Public transport provides the greatest opportunity to promote mode shift away from private vehicle use. It needs and must have a high order priority within Council’s medium and long-term planning.”

“Public transport is a significant consideration of Geelong’s future as we grow to 500,000 people in the next 20 years.”

In that submission, the Committee for Geelong made the following recommendations:

- *The need to align with the Accessible and Inclusive Geelong Feasibility Study and recognise that walking and cycling is often not an option for people with a disability and that public transport that is accessible and inclusive is often the only option.*
- *That public transport options and the consideration of new technology – for example trackless trams – be included at the forefront in ongoing dialogue with the Victorian Government’s Department of Transport.*
- *Priority routes and transit lanes for public transport that supports the cycling and pedestrian priority routes within the Central Geelong area that offers flexibility and creativity, acknowledging the evolving nature of public and sustainable transport.*

The need for a Department of Transport funded and led public transport strategy for Metropolitan Geelong is urgent. We believe that for the CGFP to be truly embedded in local planning, a public transport strategy must be developed simultaneously. The Committee for Geelong stands ready to support and advice on the development of this strategy.

SHARED POSTIONS WITH UDIA VIC (Geelong chapter)

The following section in this submission includes edited extracts from contribution via the UDIA Vic Geelong Chapter of which the Committee for Geelong CEO Jennifer Cromarty is a member. We wish to thank members Nat Anson, Aaron Walley, Nick Clements and Greg Bursill for their contribution and advise that the Committee for Geelong is in agreement with statements as follows:

Local Planning Policy

Clause 21.09 (as amended) identifies the key issues and influences upon Central Geelong and consequently proposes a series of objectives that seek to:

- “Support Central Geelong to be an international waterfront city with world class facilities.
- Encourage high density housing development.
- Encourage innovative and sustainable design outcomes whilst maintaining overall intensity of development.



- Discouraging the under development of sites.”

UDIA Victoria (and the Committee for Geelong) support these aspirations as we share a future view of Central Geelong as a vibrant and welcoming business district that is connected to its surrounding suburbs and metropolitan Melbourne.

Geelong is no longer a regional town and is appropriately recognised as Victoria’s second city within strategic planning policies such as Plan Melbourne.

The UDIA is concerned that the bright future for Central Geelong as a modern international waterfront city with envisaged world class facilities may be unnecessarily constrained by the Central Geelong Framework Plan and corresponding planning controls.

The Central Geelong Land Use and Market Assessment (SGS Economics and Planning) has informed the Central Geelong Framework Plan’s land use demand projections for 2050. This assessment has been largely relied upon to guide the proposed changes to the planning controls.

While it is acknowledged that this economic assessment has considered a variety of growth scenarios based on retail and commercial floorspace demand, as well as population and employment growth, UDIA Victoria (and the Committee for Geelong) submits that this approach should not unreasonably curtail the unforeseen market changes that may occur over the coming years.

Building Heights

UDIA Victoria (and the Committee for Geelong) is generally supportive of the need to provide further clarity around buildings heights throughout all precincts within the central business district.

However, UDIA Victoria (and the Committee for Geelong) believes that in some cases there appears to be a sporadic application of preferred building heights that are often incongruous with surrounding land parcels. It would appear that preferred building heights have in some circumstances been applied based upon the size of the land parcel, rather than broader strategic principles associated with the precinct.

If this is in fact the case, this does not recognize the common outcome where smaller parcels are combined by developers to achieve required development efficiencies.

UDIA Victoria (and the Committee for Geelong) submits that greater consideration should be given to the likely consolidation of smaller parcels within the central business district prior to their redevelopment.

Building Setbacks

The proposed Activity Centre Zone (Schedule 1) provides for a complex arrangement of front, side and rear setbacks as well as building separation.

The controls do not adequately address whether a 6m setback (above street wall height) would be applied to each street frontage, or would a designated “front” be determined? If the latter, how would the “front” be determined?

Even where a 4.5m setback could be adopted for secondary streets not considered to be the “front”, it results in an unnecessarily constrained development outcome. Buildings with setbacks less than



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4.5m can be well-designed and highly articulated buildings.

The proposed setback guidance will impact on the ability to create design excellence and uniqueness in built form, instead resulting in a homogenous and repetitive built form outcome that is often referred to as 'layer caking'.

Additionally, Clause 4.4 that states that... "A terrace, deck or balcony should not protrude into the building setback requirements." To not permit balconies to protrude into building setbacks is excessive and unnecessarily restrictive in our opinion.

Car Parking

The car parking objective at Clause 2.0 of the proposed Activity Centre Zone (Schedule 1 to Clause 37.08) that states *"To provide car parking provision that responds to anticipated demand, except in the Retail Core precinct where additional car parking should be minimised."*

On its own, the above objective is insufficient to support key elements of the Draft Structure Plan Transport and Movement objectives that seek to encourage transport mode change and transition away from car use.

Planning for significant public transport service improvements as well as works to improve the attractiveness of active transport are critical to be undertaken in conjunction with parking reductions. The UDIA Victoria (and the Committee for Geelong) is pleased that significant investigation for public transport improvements has formed part of the strategic work undertaken.

Geelong traditionally had a tram network and we would encourage the Government to develop a business case for investment in higher frequency and capacity public transport network provisions to support reduction in car traffic into the CBD. <ref: Committee for Geelong call for trackless trams pilot ['Trackless trams' potential pilot for Geelong - Committee for Geelong](#)>

The Government recently released its new bus strategy which includes the concept of trunk bus services and even Bus Rapid Transport (BRT) which if applied in Geelong could help achieve the desired transformation. This would be consistent with Council's vision for the Clever and Creative Corridor in the Northern and Western Growth Areas which was subject to discussion at the Amendment C395 planning panel hearing in 2020.

Land use car parking requirements outside of the Retail Core Precinct remain as minimum requirements under the provisions of Clause 52.06, with matters required to be addressed within a car parking demand assessment under Clause 52.06 predominantly based on current or historic data, not aspirational objectives. It is not clear spatially where Action 22.2.2 will be applied (Action 22.2.2 Apply the parking rates in column B of Clause 52.06 for sites located within 400m of high- frequency corridors). A plan indicating its application would be helpful.

Car parking concessions beyond the statutory rates of Clause 52.06 are typical in central business districts and are critical to appropriately minimize car dependency, promote active transport modes, support public transport and activate the broader area. As such UDIA Victoria (and the Committee for Geelong) supports a review of land use car parking requirements within Central Geelong in-line with the actions at Strategy 26.1 of the Draft Structure Plan.

UDIA Victoria (and the Committee for Geelong) also submits that alternate land use car parking rates,



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particularly the removal of minimum car parking requirements, provides greater development flexibility.

It is unclear what consideration has been given to land use car parking provision within the built form modelling and outcomes testing scenarios within the Urban Design Framework. This could be explored in roundtable discussion with interested stakeholders.

Transport and Movement

Geelong Station and the Moorabool Street Central Geelong bus interchange remain the significant focus of bus and rail activity across Geelong. Ryrie Street, McKillop Street and LaTrobe Terrace are key regional road links that pass through Central Geelong.

Whilst the UDIA Victoria (and the Committee for Geelong) broadly supports the Transport and Movement objectives within the Draft Structure Plan and agrees with the need to improve transport options (Objective 22) and to identify a clear street hierarchy and reduce through traffic through Central Geelong (Objective 23), these Objectives should be guided by a broader regional and integrated transport approach and be fully coordinated with other strategic transport initiatives currently underway, including the Geelong Growth Area Transport Infrastructure Strategy.

Implementation

The Central Geelong Framework Plan outlines a comprehensive list of actions required to inform its ongoing implementation. More than 30 of these actions relate to the preparation of stand-alone plans and strategies.

Generally, we support the vast majority of these projects being designated as 'immediate' or 'short term', noting the urgency to facilitate additional work required to support development in Central Geelong.

UDIA Victoria (and the Committee for Geelong) submits that each relevant lead agency, (Department of Transport, Revitalising Central Geelong Partnership and the City of Greater Geelong), must be supplied with the necessary and dedicated staffing resources and budget to complete the actions in the short timeframes specified.

We further submit that it is important that key agencies responsible for delivering these plans, strategies and initiatives make a strong commitment to future consultation and that each future action incorporates timely and informed stakeholder consultation as appropriate.

6. Application Process

UDIA Victoria (and the Committee for Geelong) is concerned that nowhere in the CGFP does it explain, either diagrammatically or in writing, the planning permit application process.

At present, the application process is unnecessarily complex and timing consuming. Planning applications are formally and informally referred to Development Victoria, the Geelong Authority, the Office of the Victoria Government Architect, the City of Greater Geelong, and other relevant agencies. Too often our members report that application processes differ from site to site and that consistency of comments from the Office of the Victorian Government Architect is lacking.

UDIA Victoria (and the Committee for Geelong) submits that the application process must be critically



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reviewed and streamlined to provide greater clarity to our members.

In addition, our members are reporting too often that applications are being managed by planning officers from the Department's Melbourne office rather than planning officers from the local Barwon office. For a city of the scale and importance of Geelong, it is no longer reasonable for Melbourne-based planning officers to manage applications that are often fraught with characteristics unique to Geelong alone.

In conclusion, the Committee for Geelong is generally supportive of the intent of the Central Geelong Framework Plan and corresponding planning controls and recognises the need to better manage the evolution of Geelong over the coming years as we grow.

Many thanks for the chance to make this submission.

The Committee for Geelong would welcome the opportunity for ongoing engagement and to answer any questions you may have with respect to this submission. Please feel free to contact me via jennifer.cromarty@committeeforgeelong.com.au or contact my office direct on 03 5227 8075.

Kind regards,

Jennifer Cromarty
CEO, Committee for Geelong