19 June 2009

Ms Alex Douglas
Executive Officer
Road Safety Committee
Inquiry into Pedestrian Safety in Car Parks
Parliament of Victoria
Spring Street
East Melbourne VIC 3002

Dear Ms Douglas

Re: Inquiry into Pedestrian Safety in Car Parks

I refer to the Road Safety Committee’s current inquiry into pedestrian safety in car parks. I have been engaged by ALDI Stores to prepare a submission setting out their views in relation to the issue.

In preparing this submission I am aware that the Road Safety Committee was requested by the Legislative Assembly to consider the “current rules and standards that apply to pedestrian safety in car parks, and the Committee is to recommend potential measures that relevant authorities should consider to improve safety for pedestrians”.

Clearly there exist many different types of car parks having many different characteristics including size, number of spaces, length of stay, types of users, requirement to provide for loading activities etc. Given this wide range of car park characteristics, it is important to note that this submission relates only to ALDI car parks, which may be seen as a sub-set of supermarket car parks.

ALDI Stores currently have 203 stores operating within Australia, mainly located along the east coast. Within Victoria, ALDI Stores operate 69 stores, 44 within the Melbourne Metropolitan area and 25 in Regional centres.

There are two main types of ALDI car parks – those constructed to support stand-alone ALDI stores (of which there are 38 within Victoria), and those where an ALDI store is located within a larger shopping centre, where shared parking areas are provided (of which there are 31 within Victoria). For stand-alone ALDI stores, car parks of between 70 spaces and 100 spaces are generally provided. Some stores have car parking provided on an upper or lower level.

ALDI Stores takes the issue of pedestrian safety extremely seriously. They design their car parks on a site by site basis to maximise pedestrian safety both for their customers and for any other pedestrians who may access or walk past the site. In some situations this may
involve provision of a walkway of some type through the car park (for example, linking the street footpath network with the doors of the store), while at other sites (typically where the doors of the store may be accessed directly from the street footpath network), on-site walkways are generally not provided.

I have been advised by ALDI Stores that they have never been notified of any pedestrian safety issue relating to any of their stores.

ALDI have developed their design approach as a response to the fact that in most cases providing formalised walkways through the car park would be of little benefit to shoppers, most of whom have different ‘desire lines’. For example, most shoppers will take the shortest route between their vehicle and the store entry (and vice versa on departure). Shoppers parked in different areas of the car park will therefore take different routes to and from the store, meaning the provision of a walkway would provide for only a very small number of customers.

I note that for stand-alone ALDI Stores the delivery truck loading bay is typically accessed through the car park, sometimes requiring 19 metre semi-trailers to reverse along a section of car park aisle to reach the loading bay. All exiting truck movements are in a forwards direction. The requirement for this method of arrival and departure is a function of site size but also results from restrictions of access, where only a single vehicular access point to the site from the road network is permitted. It is important to note that ALDI stores generate only 1 to 2 semi-trailer delivery vehicles per day (significantly fewer than the major supermarket chains), with one of these vehicles typically arriving outside of trading hours. Therefore typically only one semi-trailer per day accesses the site during operating hours when customers are present. Additionally, there are a very small number of smaller trucks accessing the site on a daily or weekly basis (e.g. bread delivery truck and garbage truck).

ALDI Stores carefully designs and monitors the operation of their car parks. Observation and the ALDI internal reporting systems show that the safety of pedestrians is not impacted by the use of car park aisles by delivery vehicles once per day during operating hours.

In conclusion, I wish to emphasise the many different types of car parks and car park users that exist. I would ask that the Committee does not recommend a ‘one-size-fits-all’ design approach to pedestrian safety in car parks. Rather, it is more appropriate for car park designs to be undertaken relating to the conditions existing at a particular site.

If requested by the Committee I would be pleased to attend the public hearings associated with this inquiry.

Yours sincerely

O'BRIEN TRAFFIC

[Signature]

Deborah Donald
Director