



## Whitehorse City Council submission

### Suburban Rail Loop Draft Key Directions – Box Hill and Burwood

June 2024



## **EXECUTIVE SUMMARY**

Whitehorse City Council (Council) reiterates its support of the transport benefits that will come from the Suburban Rail Loop (SRL) project. Council again appreciates the move to a polycentric Melbourne to accommodate significant population growth and agrees that population should be directed where necessary infrastructure and community facilities exist, and where there is capacity for infrastructure to be improved or expanded to meet growth.

The SRL Precinct Key Directions comprise several draft ideas that will promote discussion, some of which are already contained in, and being implemented by, existing local strategies. Council's submission regarding the draft Key Directions for the Box Hill and Burwood precincts highlights areas of support as well as concern.

The submission discusses the following:

- Information supporting the draft Key Directions
- Consideration for existing Council strategies in the draft Key Directions
- Detail about community infrastructure required for the projected population growth
- Information about built form and design to accompany the proposed building heights.
- Implementation mechanisms for the PSPs
- Consultation, engagement, and overall procedural issues

Council wants to work collaboratively with the SRLA to develop the Precinct Structure Plans (PSP) so they meet the aims and objectives of the State Government, while still achieving long lasting and sustainable outcomes that Whitehorse residents, businesses, visitors, and the Council can be proud of.

## 1. INTRODUCTION

This submission outlines comments from Council relating to the SRL draft Precinct Key Directions for Box Hill and Burwood.

It also expresses Council's comments regarding consultation, engagement and procedural issues relating to the overall SRL PSP process within the City of Whitehorse.

## 2. GENERAL COMMENTS ON THE DRAFT KEY DIRECTIONS

### 2.1 Supporting information

The draft Key Directions do not include any supporting information beyond the high level Key Directions. Council considers this insufficient information for a project of this significance and scale and queries the absence of supporting discussion and rationale which is typically provided ahead of more detail in the future PSP. Council would like to know when the supporting information that underpins the Key Directions will be available?

As a minimum, the supporting discussion (and ultimately actions) should include responsible agencies, timing, and funding to allow feedback on these details.

Council requests that the Structure Plans and specific strategies, actions, and responsibilities for implementing the recommendations should be developed in collaboration with Council, rather than being presented to Council after they are completed. These details will need to be reviewed and scrutinised by Council's subject matter experts.

Additionally, there is a need for 3D modelling to assist the community in understanding the proposed building heights.

### 2.2 Existing local policies and strategies

Council has undertaken significant strategic work, including, but not limited to, the review of the existing *Box Hill Structure Plan, 2007* (the draft *Box Hill Structure Plan, 2021* [the draft BHSP]), the draft *Box Hill Urban Design Framework, 2021*, the preparation of the *Whitehorse Housing Strategy, 2014* and *Neighbourhood Character Study, 2014* and more recently the *Whitehorse Residential Corridors Built Form Study, 2019*. This work included significant community engagement, robust technical research and analysis of future employment and population growth, and therefore represents the aspirations and goals by the community and Council. These must be considered and appropriately reflected in the Structure Plans, and any new planning controls should be applied accordingly.

The SRLA has been provided with all the relevant information regarding the suite of existing and draft structure plans and other relevant strategic documents applicable to the Structure Plan areas. Council's submission to the Discussion Paper provided a list of relevant documents that Council requested to be referenced by the SRLA relevant to Box Hill and Burwood Structure Plan. There appears to be little consideration given for the existing strategic work in the draft Key Directions.

### 2.3 Social and community infrastructure

There is an absence of substantial information regarding social infrastructure or services to meet the needs of the projected population, businesses, and workers. The draft Key Directions focus on where employment and housing will be located, however additional open spaces, new schools, other community facilities and service infrastructure (e.g., drainage, new and or upgrades to roads, intersections) required to meet the needs of the projected population and businesses are given little

mention. Council emphasises the need to be involved in the necessary technical studies to project the expected population and increase in economic activities, and the infrastructure needs to inform the Structure Plans.

Council is particularly concerned about the impact of the forecast population on the need for new education facilities, from kindergarten through to secondary schools. Current education facilities are approaching, or are at capacity, and Council is not aware of any new facilities being proposed. Council would like to see planning by the Department of Education for new facilities to support the projected population growth. Education facilities need to be provided locally (from a sustainability and liveability perspective), instead of relying on schools from further afield.

There are existing pressures and demands on sport and recreation facilities, that will be exacerbated by population growth. By contrast, there may be some sports and activities that are oversupplied with facilities. Further analysis is needed in consultation with Council to determine an appropriate balance for our diverse community. Council looks forward to receiving details of additional state infrastructure which is proposed to be deployed within Whitehorse to accommodate the additional population.

#### 2.4 Sustainability and climate change

Council has a commitment to be net zero and aims for net zero community emissions by 2040. The following ideas should be explored as part of the implementation mechanisms, as they align with Council's *Climate Response Strategy 2023-2030* and the Empowering Sustainability Key Direction:

- The PSPs should be climate appropriate, resilient, adaptive and elevate Environmentally Sustainable Development (ESD) targets.
- The PSPs should aspire for net zero community emissions by 2040 and include innovative strategies for transitioning urban precincts towards net zero, along with opportunity to create net zero precincts, looking at consumer energy resource and grid integration.
- The percentage of green space and areas allocated to canopy cover, urban forest, biodiversity, nature should be increased.

Further comments are included under Empowering Sustainability for each precinct.

#### 2.5 Implementation

The Key Directions include words such as “investigate,” “ensure” and “support,” however Council believes that the Key Directions need to be more nuanced and provide a stronger implementation commitment by the SRLA and State Government. More robust words such as “implement,” “provide”, “fulfil,” “execute” or “accomplish” should be part of the PSP language to provide certainty to the community and Council about the long term delivery of the Structure Plans.

As previously stated in feedback to the SRLA, there is also no mention about how the required community and development infrastructure indicated in “Enriching Community” will be funded, the timing of delivery or who will be responsible for delivering the infrastructure. Council’s current *Whitehorse Development Contributions Plan, December 2023* (DCP) has not factored in the growth and development projected by the SRLA. As such, the current DCP will not cover the infrastructure cost to come out of these Structure Plans, and in a rate capping environment, Councils do not have the funds to support infrastructure delivery arising from the Structure Plans.

Council reiterates the suggestion that these Structure Plans should develop a practical funding mechanism and infrastructure delivery plans for funding the infrastructure projects that are required to meet the needs of the projected growth from these Structure Plan areas. If the SRLA chooses to

prepare specific DCPs for these Structure Plan areas, the SRLA must also prepare funding mechanisms to pay for the balance of the cost of each of the infrastructure projects identified to be delivered in these Structure Plans, without any financial burden or 'cost shifting' to Council. Council also suggests this could be via a 'value capture' mechanism whereby contributions are made by developers to fund infrastructure. The SRLA must also provide the technical design knowledge and construction implementation to ensure the infrastructure will sustain the population numbers and sizeable developments that will occur.

Council would like more information about value capture mechanisms that might affect existing landowners and the flow on effects to housing affordability in the PSP areas. Council is keen to ensure any mechanisms such as this are properly communicated to the community.

Whilst the SRLA has not provided any detail on likely planning controls to facilitate its proposed building heights, the significant increase in building height proposed means that there will be the need for significant changes to the existing planning controls. Many of the proposed building heights released with the Key Directions do not align with the existing suite of residential zones and therefore Council seeks to understand as early as possible the proposed zone and planning controls that are being considered. It is also critical that the building heights respect the interface between properties in the PSP areas and more traditional development and provide appropriate transitions. Council must be consulted and actively involved in determining the appropriate zones and overlays to be applied to the Structure Plan areas, as well as future built form and other controls (such as to achieve affordable housing) to be implemented.

### 3. SPECIFIC COMMENTS - BURWOOD

The draft Vision document included generic themes. These themes seem to have been transferred directly over to the Key Directions, without any refinement or recasting as a result of community feedback.

Council’s comments regarding the Key Directions are outlined in the table below. Some of the commentary reiterates Council’s previous feedback.

Precinct Key Direction	Whitehorse City Council comments
<p>Boosting the Economy</p> <ul style="list-style-type: none"> <li>• Support and facilitate the growth of Deakin University’s Burwood Campus</li> <li>• Create a mixed-use Precinct Centre around the SRL train station</li> <li>• Transform Burwood Highway and Highbury Road into areas with more retail and businesses</li> <li>• Create a network of high-amenity knowledge-based employment areas</li> </ul>	<p>Council supports the growth of Deakin University’s Burwood Campus, given its important role in the municipality and broader region.</p> <p>The PSP process provides the opportunity to review the current land use activities and development in the existing industrial and commercial areas of Burwood, however this needs careful consideration to ensure that planning for the future needs of the area, including jobs and services, does not make it prohibitive for a range of commercial and industrial uses. Council is concerned about the loss of important industrial land in favour of more residential land use.</p> <p>There are streets within the Burwood commercial and industrial areas that invite an opportunity for a greater mix of land use activities and changes to current built form typologies and scales, however this would need to be carefully managed through appropriate planning zoning and overlays to ensure the optimal mix and intensity of uses that can function coherently and offer an appropriate level of amenity.</p> <p>It is noted that, any mixed-use zones that allow residential uses in the Structure Plan areas, should include clear requirements that future residential land uses should not unreasonably disadvantage existing industrial uses and businesses in the area. Critical consideration needs to be given to current ‘as of right’ uses in the Industrial 1 zone. Future residents in zones that allows for residential and mix of land uses need to be aware of the mixed-use nature of the area and that the level of amenity may be different to the amenity in purely residential areas.</p> <p>Alternatively, if the structure planning process were to result in the loss of industrial land, which is in short supply across Metropolitan Melbourne, this needs to be replaced within the nearby catchment.</p> <p>Council queries how the SRLA and the Structure Planning process will attract businesses and again reiterates our desire to be actively involved in the discussions about, and working through, the appropriate zones and overlays and other planning controls to be</p>

	<p>applied to the Structure Plan areas to ensure the appropriate planning framework is in place.</p> <p>Council also believes that net zero emissions precinct governance opportunities should be established across the local businesses in the precinct, and support should be given to enable all businesses and their operations within the precinct to transition to net zero emissions.</p>
<p>Enriching Community</p> <ul style="list-style-type: none"> <li>• Ensure community infrastructure supports the needs of residents and workers, including multi-purpose hubs</li> <li>• Introduce greater housing diversity</li> </ul>	<p>Council supports enriching the community; however, it queries how this can be achieved by the precinct planning. The Key Direction mentions community infrastructure but there has been little to no information provided about the type of community infrastructure required, where it will be provided and how it will be funded. Council is currently developing a municipal-wide Community Infrastructure Plan that is open for initial community consultation. More information is at <a href="https://yoursay.whitehorse.vic.gov.au/cip">https://yoursay.whitehorse.vic.gov.au/cip</a>. This project recognises there is a need for buildings and facilities where community services are provided, such as aquatic centres, community halls, libraries, kindergartens, Maternal and Child Health, sports fields, and senior centres. The PSP does not identify these facilities. There are existing pressures and demands on sport and recreation facilities, that will be exacerbated by population growth. By contrast, there may be some sports and activities that are oversupplied with facilities. Further analysis is needed in consultation with Council to determine an appropriate balance for our diverse community.</p> <p>The Burwood Precinct contains, or is close by, to several education sites and Council encourages investigating the co-use of all, or part, of these sites for open space and community facilities. In particular, there is merit in investigating the use of facilities at Deakin University as well as the future use of the Mount Scopus site if the school ultimately decides to relocate as has been reported in the media, most recently in June 2024. Greater detail is needed in order for Council to respond to where potential lies for regional open space for sporting facilities.</p> <p>Council also supports providing greater housing diversity, but queries how this will occur when it appears the PSP is encouraging development that begins at 7 storeys, which limits the provision of less intense development and that may only appeal to some cohorts in the community. Amendment C220 to the Whitehorse Planning Scheme (Planning Scheme) was recently approved, which applies a Design and Development Overlay (DDO) to land included in the Residential Growth Zone (RGZ) along Burwood Highway. This amendment was approved with a discretionary height limit of 6 storeys and provisions to protect the sensitive interface between the RGZ and less intense development in the Burwood Highway</p>

	<p>hinterland. The PSP process should also recognise this and review the proposed building height proposed along the corridor.</p> <p>Council also queries what mechanisms the PSP process proposes for the Burwood precinct in relation to affordable housing, given its high student population. Affordability and diversity of housing is also crucial in this precinct to support aging in place. The PSP process needs to review the current and projected demographic trends to ensure provision of appropriate housing stock.</p>
<p>Better Connections</p> <ul style="list-style-type: none"> <li>• Investigate improving walking, cycling and biodiversity connections along Gardiners Creek (KooyongKoot)</li> <li>• Create a world class and well-integrated public transport interchange</li> <li>• Upgrade and connect transport routes, as well as improve walking and cycling paths</li> <li>• Support public transport and active travel choices to reduce reliance on private vehicles</li> </ul>	<p>Council supports creating better connections, however there should be greater attention to overall access and movement to, and within, Burwood, particularly how to improve the catchment to the new SRL station. Council queries the 22% mode share for active transport in 2018. This seems very high, and Council would like clarification about where the data is from.</p> <p>Many of these directions are vague platitudes and should include stronger commitment than “investigate” or “support.” Council seeks clarification about “biodiversity connections” and whether this relates to animal crossings/highways.</p> <p>Council supports improving the paths along Gardiners Creek subject to a range of considerations. Boroondara and Stonnington have already started on the Gardiners Creek cycling corridor, therefore the precinct planning should consider how this portion of Gardiners Creek Trail could contribute to a connected and safe corridor for recreation and sustainable transport.</p> <p>The cycling connection at Elgar Road and Uganda Street should be improved by the SRLA, such as adding a bicycle lantern for western movements. This is on one of Council's Easy Ride Routes, it provides access to the Gardiners Creek Trail and one of the main end of trip cycling facilities at Deakin University. Improvements are also needed for the Gardiner’s Creek Trail crossing at Highbury Road.</p> <p>Consideration should be given to the extension of Tram Route 70, from the current terminus at Riversdale Road and Elgar Road, south along Elgar Road to Deakin University/SRL Burwood Station/Burwood Highway/Tram Route75.</p> <p>Tram Route 75 along Burwood Highway provides connections from the east and west of the SRL Burwood Station. There are however opportunities for capturing significant patronage with the extension of the tram route beyond Vermont South to enable those who live, work and study in the City of Knox and beyond, to connect to the SRL Burwood station. It is acknowledged that this lies outside the 1.6km radius of the Burwood Precinct however, this example shows the limitations that a radial model places on the structure planning process.</p>



	<p>Council supports new bus connections along Highbury Road and recommends the SRLA work with DTP to ensure the bus interchange at the new SRL station can accommodate increases in bus service levels and additional services. This is noting that the diagrams look to remove the bus stop/terminus within the Deakin University campus. The 903 SmartBus Route now uses Elgar Road, however consideration should be given if this bus route should be re-routed to the SRL Station and then along Highbury Road.</p> <p>Council cautions that shared pathways can pose a higher risk for people with disability, older people and children who may not be able to react to approaching bike riders. Careful consideration of the design of pathways is needed to manage potential path user conflicts, for example, where shared paths intersect with pedestrian movement paths such as the entry and exit from stations and pedestrian pathways across roads. Access to the station forecourt and surrounds should be streamlined and accessible, with clear and visual wayfinding.</p> <p>Council strongly recommends a reduction in speed limits along major roads within the precinct to change the priority of private vehicles, which would improve walking and cycling connections and promote active travel choices. Likewise, investment into the bus network and bus services will ensure that the expected increase in people living in Burwood will have access to many more services and destinations in the area without needing to use a car.</p>
<p>Enhancing Place</p> <ul style="list-style-type: none"> <li>• Identify opportunities for enhanced and new open space</li> <li>• Support growth by encouraging change in targeted locations</li> <li>• Manage stormwater better to improve water quality and support a greener environment</li> </ul>	<p>Council supports this theme; however, the document does not include any information about built form and design including how individual buildings will interface with, activate, and treat the public realm. There needs to be provisions relating to the built form and public realm amenity such as overshadowing and wind effects. There is also no reference to place identity and recognition of the heritage values in the precinct.</p> <p>The proposed building heights raise concern for Council, particularly those areas proposed to allow 20 storeys, which Council considers inappropriately high for the area.</p> <p>Further it is noted that the 20 storey core for Burwood seems to be comparatively much more extensive than for other SRL station precincts south of Whitehorse. Council questions the justification for this height and extent given the Burwood context (aside from the presence of the more modest Deakin University buildings within a generous campus setting).</p> <p>The major asset in the precinct is the Gardiners Creek corridor and Council continues to advocate for the Creek to be naturalised to Highbury Road and well beyond into the City of Monash. Council seeks a commitment in the Structure Plans with strategies as to how to achieve this outcome. Any interface to the creek also needs</p>

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to be nuanced and provide for passive surveillance, yet limit overshadowing and overlooking. The proposed 20 storey building height around Highbury Road is not appropriate around the creek, and the pedestrian experience from the public realm needs to be strongly considered.

Council prepared the *Whitehorse Residential Corridors Built Form Study* in 2019. This reviewed the built form controls along the Burwood Highway corridor and ultimately resulted in Amendment C220 introduced Schedule 11 to the DDO. This Study and Amendment recognises that there are sensitivities between the Burwood Highway corridor and properties to the north and south of the corridor, which do not appear to have been considered by the SRLA.

The Study ultimately recommended suitable building heights for the corridor of up to 6 storeys. The PSP process should also recognise this and review the proposed building heights, particularly the 10 storey building height proposed along the corridor, in line with Council's Study, as well the transition between such heights and the traditional residential development outside the PSP areas, for example in the Glengarry Avenue area.

Council believes that the proposed building heights towards Warrigal Road should be reviewed. Whilst there are heritage properties in this vicinity, the proposed heights approaching Warrigal Road do not make sense when considering the wider corridor going into an adjacent Activity Centre within the City of Boroondara. This area is where taller buildings could be proposed.

There is a significant need for additional recreational and open space facilities. Doubling the population and number of employees with the same amount of open space is not sustainable, nor will it enhance liveability within Burwood.

There is support for the link between Gardiners Creek and the Lundgren Chain, and further opportunities for public open space should be explored. Consideration should be made about how users of Lundgren Chain can safely cross Station Street. The Whitehorse Open Space Strategy also identifies the use of streets for active recreation as a priority. In enhancing the open space network, cool connections between all open spaces should be created to promote walking, cycling and active transport for all ages and abilities.

Creating opportunities for new public recreation and community spaces is vital and consideration should be given to the role that a repurposed Mount Scopus site could bring if the school decides to relocate. If the existing recreation and cultural facilities on the site are suitable, they could provide an enormous benefit to the Burwood community (and the wider regional community).

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	<p>The Bennettswood Reserve Masterplan is currently being developed by Council. Particular focus is to investigate the redevelopment of the northern oval and extension of the pavilion and other sporting / activity areas to the north. Council seeks to work with the SRLA during the development of the Masterplan to ensure upgrades to the sites are captured as part of the PSP process.</p> <p>New and improved open space and recreation facilities are necessary to meet the needs of the growing community that is projected by the SRLA. Council believes that there is great opportunity for the State Government to invest in community infrastructure and sustainability initiatives in both the Bennettswood Reserve and the Gardiners Creek Reserve to assist with meeting these needs.</p> <p>Sinnott Street Reserve should also be returned as open space post construction of the station. If this cannot occur, Council would like to see the temporary offset open space between Cumming Street and Gillard Street made permanent and for this land to be transferred to Council as freehold land. Council also expects that any new open spaces created within the Burwood precinct be transferred to Council as freehold land.</p>
<p>Empowering Sustainability</p> <ul style="list-style-type: none"> <li>• New buildings should use sustainable practices such as lower carbon material and include renewable energy in their design</li> <li>• Future proof the precinct and plan for new energy technologies</li> <li>• Create a cool and green environment</li> <li>• Embed sustainable water management</li> </ul>	<p>Council supports this Key Direction, particularly to embed measures to promote sustainability and mitigate climate change where it aligns with Council’s Strategic Directions and ESD principles and objectives. However, Council seeks more information about how the SRLA proposes to achieve this. In particular, Council queries what incentives or affordable solutions are proposed to ensure sustainability is incorporated in the PSP process and future development. Council firmly believes that the precinct should be able to manage water, waste and energy while being net zero by 2040, given the increase in activity density and population. Additionally, there needs to be direction around using building rooftops and building facades for energy facilities, green space, and water harvesting.</p> <p>A precinct wide sustainable governance framework should be established to manage integrated energy systems. Existing infrastructure should be assessed for vulnerability to climate change impacts and adaptation strategies should be developed to enhance resilience and mitigate risks for uses and asset owners and managers.</p> <p>Council currently has an ESD Policy at Clause 22.10 of the Planning Scheme. This policy aims to integrate environmental sustainability principles into land-use planning, new developments, and redevelopment of existing infrastructure. It includes objectives relating to energy performance, water, indoor environment</p>

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quality, stormwater management, transport, waste management and urban ecology. Council therefore queries what the SRLA will promote that is not already occurring and if the structure plans will seek higher levels of sustainability.

Future proofing the precinct and planning for new energy technologies is a commendable aspiration. At the current rate of development, the infrastructure will already be under pressure within the planning horizon, without the projected population from the SRLA. Therefore, what mechanisms will the SRLA develop and implement to ensure this direction is pursued? Council believes that the PSP process should identify suitable locations within the precinct for renewable energy generation, such as solar photovoltaic (PV) panels.

Given the heavy night-time energy use profile of the area, energy efficiency and emissions reduction principles should be embedded into assets and sites. Opportunities for partnerships with local community groups should be explored to establish community battery solutions where the return on investment and payback period are viable.

Holistic water-efficient design and management should be implemented that integrates the whole precinct - linking buildings, infrastructure assets, paved surfaces, landscaped areas within the precinct. This should include water cycles and systems thinking of natural services/ utilities across the whole precinct.

Council queries the meaning behind “create a cool and green environment” which is very broad and needs to be more specific. Burwood is an established urban area, and the urban heat island effect can affect the use of the public realm and open spaces. The PSPs must include ways to reduce the urban heat island effect.

Council has undertaken a significant quantum of work to protect and enhance the important tree coverage across the municipality. This includes the *Whitehorse Municipal Wide Tree Study* (translated into Schedule 9 to the Significant Landscape Overlay within the Planning Scheme), and the *Whitehorse Urban Forest Strategy for 2021 –2031 (2021)*. Council agrees with setbacks to accommodate deep soil planting at the front of the built form, and between buildings, but also advocates for tree pits and passive irrigation to facilitate tree planting in hardscape zones. Roof top gardens provide limited benefits to those at ground level, however green walls when utilising climbers with their roots in the soil at ground level can achieve good outcomes. Council is concerned that there is an expectation that the 30% canopy cover will lean too heavily on the public realm; instead, private development should equally be expected to contribute.

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	<p>Council would like the precinct planning to consider an increase in canopy planting in streetscapes and public spaces – for example, in kerb outstands along areas being considered more pedestrian friendly. There are many innovative ideas for canopy planting in these areas to make them more leafy suburban streets like other areas of Whitehorse and help curtail urban heat issues and aim to meet Council’s target for tree canopy coverage. Pedestrian and cycle routes need to be cool, with planted ground surfaces and safe tree canopies. Space should be reclaimed to accommodate more trees and plants and enhancing cool and green spaces.</p> <p>Sustainable materials and construction practices should be prioritised in the development and maintenance of all assets, in particular the use of recycled or local sourced materials and waste management strategies.</p> <p>Finally, there is no reference to flora and fauna diversity, including native animals and trees and vegetation. Council queries whether biodiversity, currently included in Better Connections, should be included under Empowering Sustainability.</p> <p>Council is seeking best practice integrated water management practices to be embedded through planning controls within the Planning Scheme. The aim is to ensure all future developments within the SRL precincts are sustainable, drought-proof and designed to adapt to climate change. Additionally, stormwater management across the precinct is integral to mitigating impacts on the Gardiner’s Creek corridor.</p>
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#### 4. SPECIFIC COMMENTS - BOX HILL

The draft Vision document included generic themes. These themes seem to have been transferred directly over to the Key Directions, without any refinement or recasting as a result of community feedback.

Council’s comments regarding the Key Directions are outlined in the table below. Some of the commentary reiterates Council’s previous feedback.

Key direction	Whitehorse City Council comments
Boosting the Economy <ul style="list-style-type: none"> <li>Ensure the Box Hill Precinct will have enough office space to accommodate significant employment growth, especially near to the centre</li> </ul>	<p>Council suggests including themes and objectives detailed in Council's recently adopted <i>Investment and Economic Development Strategy 2024-2028</i>, which contains commentary about industry development, liveability, and the visitor economy. The strategy can be accessed via <a href="https://www.wbiz.com.au/investment-economic-development-strategy-2024-2028">https://www.wbiz.com.au/investment-economic-development-strategy-2024-2028</a></p> <p>Activity Centres, such as Box Hill, attract a large volume of spend in the region and provide significant amenity to support the</p>

<ul style="list-style-type: none"> <li>• Ensure sustainable growth of health and education services in the Precinct</li> <li>• Extend activity and services right across the Precinct to support local living</li> <li>• Concentrate retail and entertainment uses in and around the Precinct Centre to support a vibrant and culturally diverse place</li> </ul>	<p>visitor base, including through food, retail, and entertainment experiences.</p> <p>Given its proximity to Melbourne CBD and connectivity through public transport and freeways, Box Hill is well positioned to take advantage to explore a modern and innovative economy, including ways to enhance the visitor experience and grow its status as a visitor destination.</p> <p>The draft BHSP aimed to provide for future employment growth and rebalance future residential growth, recognising that Box Hill should remain a genuine mixed use centre that ensures future development provides opportunities for both employment and residential growth. The draft BHSP sought a maximum proportion of residential gross floor area (GFA) for certain neighbourhoods to ensure the role and function of a Box Hill as a regionally significant location for health, education and employment is maintained and employment floorspace is prioritised in neighbourhoods where employment is a primary focus. Council strongly encourages the SRLA to investigate the use of such mechanisms in the PSP.</p> <p>Having the hospitals, medical facilities and Box Hill Institute in close proximity, there are opportunities for collaborative research and innovation in Box Hill, including medical research centres, as well as centres for research and development, along with traditional retail businesses and services. The PSP process should strongly incentivise these opportunities along with the decentralisation of government, private offices, and headquarters of major corporations to Box Hill as they are the function and responsibilities of Metropolitan Activity Centres. Expected high-rise buildings will allow for larger areas that can be used for these centres as are in the Melbourne CBD and in Docklands. For example, the Ringwood Metropolitan Activity Centre (MAC) has attracted VicRoads and Eastern Health as major tenants, and this should be occurring at Box Hill. Other opportunities could include the creation of a justice precinct to allow the decentralisation of these services from the Melbourne CBD to a regional catchment.</p> <p>The third Key Direction is too broad and nebulous, instead it should be more nuanced and tailored. The accessibility of basic services and activities, such as supermarkets, is critical. The third and fourth dot point also need clarification as they appear to partially contradict each other. The draft BHSP encouraged mixed use development with a wide range of community, employment and accommodation uses, so clarification is required as to what is meant by “extend activity” vs “concentrate retail...”</p> <p>The <i>Investment and Economic Development Strategy</i> sees a diversity of uses as a key driver of economic and employment</p>
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	<p>outcomes that will foster investment in a range of sectors. The PSP process should identify how different types of tenants and employers will be attracted to Box Hill.</p> <p>Like Burwood, Council also believes that net zero precinct governance opportunities should be established across the local businesses in the precinct, and support should be given to enable all businesses and their operations within the precinct to transition to net zero carbon emissions.</p>
<p>Enriching Community</p> <ul style="list-style-type: none"> <li>• Ensure community infrastructure supports the needs of residents and workers</li> <li>• Provide greater housing diversity to support local living</li> </ul>	<p>Council supports enriching the community; however, it queries how this can be achieved by the precinct planning. The Key Direction mentions community infrastructure but there has been little to no information provided about the type of community infrastructure required, where it will be provided and how it will be funded. Multi use hubs, the co-location of facilities and shared use of facilities should be explored, for example, the Box Hill Library, Surrey Park, Box Hill Town Hall, as well as school and church facilities. There are existing pressures and demands on sport and recreation facilities, that will be exacerbated by population growth. By contrast, there may be some sports and activities that are oversupplied with facilities. Further analysis is needed in consultation with Council to determine an appropriate balance for our diverse community.</p> <p>Council also supports providing greater housing diversity, but queries how this will occur through the PSP process. There is a need for key worker housing and short term rentals (particularly for the hospitals) and disability accommodation for residents, as well as accommodation to allow aging in place. Additionally, there is an increase in demand for larger apartment dwellings to support intergenerational living in Box Hill.</p> <p>Additionally, the draft BHSP proposed to incorporate an affordable housing contribution in several of the neighbourhoods within the Structure Plan boundary. While there is a high proportion of rental properties in Box Hill, information suggests there are rental properties that lie vacant, therefore decreasing the available housing stock (particularly near the hospital) and consequently impacting rental affordability and contributing to rental distress. What mechanisms does the SRLA propose to promote affordable housing for the diverse cohorts in the community?</p>
<p>Better Connections</p> <ul style="list-style-type: none"> <li>• Reinforce existing strategic traffic corridors to direct private vehicles outside of the Precinct Centre</li> </ul>	<p>Council supports reinforcing existing strategic traffic corridors, but queries how the PSP process will be able to achieve this. More detail is required, as to whether it will be through signage, road design or other mechanisms.</p>

<ul style="list-style-type: none"> <li>• Create a compact, urban centre that prioritises walking and cycling</li> <li>• Improve access and connectivity along Whitehorse Road</li> <li>• Enhance walking experience along Station Street</li> <li>• Enhance the transport interchange’s functionality and connectivity</li> <li>• Support public transport and active travel choices to reduce reliance on private vehicles</li> </ul>	<p>The draft BHSP supports creating a compact urban centre that gives precedence to walking and cycling, and amongst other things, recommends a reduction in speed limits along Whitehorse Road and Station Street, as a minimum. This would help transform streets into higher amenity places that prioritise active transport and enhance the walking experience. Additional pedestrian crossings are also required across Station Street, such as at Box Hill Gardens and an additional pedestrian crossing leg at Rutland Road.</p> <p>Council recommends the SRLA review the Box Hill Urban Realm Vision Treatment (BHURT) guidelines which seek to improve the public realm, and ensure that streets and laneways are highly accessible, resilient, high quality and functional for the existing and projected population. The BHURT guidelines identify public realm types, and corresponding streetscape palettes. It is assumed that an even higher level of public realm provision will be needed for the SRLA’s anticipated growth in Box Hill and the wider precinct.</p> <p>Comparatively, the Key Direction for Burwood references a “world class and well-integrated public transport interchange.” As a MAC, Council strongly thinks Box Hill is also deserving, and should have, a world class interchange that is well-integrated. As previously highlighted, upgrades to the Box Hill Transport Interchange are critical and need to occur as a priority and concurrent with the SRL project, to fully enhance the transport interchange’s functionality and for Box Hill to achieve it’s potential. The need for upgrades is clearly articulated in the Box Hill Transit Interchange Ministerial Advisory Group report (2017), the subsequent Box Hill Transit Interchange Steering Committee report (2019) and Council’s <i>Box Hill Integrated Transport Study</i> (2020).</p> <p>Council supports the consolidation of car parking, as proposed in the draft BHSP, along with support for maximum parking rates in conjunction with active transport improvements. The SRLA should consider the work undertaken by DTP about maximum parking rates, titled “Modernising Car and Bike Parking Requirements.”</p> <p>Maximum car parking rates cannot be implemented without concurrent improvements to the walking and cycling network and infrastructure to assist in the mode shift away from private vehicles. A number of active transport projects in the Box Hill precinct will assist with this, particularly the completion of the Box Hill to Hawthorn strategic cycling corridor, and the construction of a link over the train line at Thurston Street/ Nelson Road. The need for wider links is also important, to connect to the broader metropolitan area. Likewise,</p>
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	<p>improvements to public transport are critical when applying maximum car parking rates. Investment in walking, cycling and public transport will ensure that the expected increase in people living and working in Box Hill will have access to many more services and destinations in the area without needing to use a car.</p> <p>The precinct planning needs to consider all future modes of personal transports, such as e-bikes, e-scooters, and electric vehicles, which may become the preferred mode of transport in a contemporary urban setting. How these are factored into the streetscape and what end of trip facilities will be delivered need to be considered by the PSP.</p>
<p>Enhancing Place</p> <ul style="list-style-type: none"> <li>• Identify opportunities for enhanced and new open space</li> <li>• Support growth by encouraging change in targeted locations</li> <li>• Enhance the open space network and make it more accessible</li> </ul>	<p>Council supports this theme; however, the Key Direction does not include any information about built form and design, including how individual buildings will interface with other development or the public realm. There needs to be provisions relating to the built form and public realm amenity such as overshadowing and wind effects which are clearly defined in the draft BHSP. Box Hill is a significant centre, and the built form and design should be of high quality and distinctive. The amenity and comfort of the public realm is important and should be comfortable and safe for both walking and sitting. Additionally, there needs to be direction around using building rooftops and building facades for energy facilities, green space, and water harvesting.</p> <p>There is also no recognition of place identity or the public realm, including the loss of the historic core of Box Hill or how the public realm will be activated and treated.</p> <p>Council does not have any concerns with the heights proposed in the Inner Precinct Core given the existing Commercial 1 Zone and development trends, however the proposed heights in various other neighbourhoods and the transition to those areas raise concerns for Council and the community. The northern part of the precinct, for example, is proposed to be substantially higher than that envisaged by the draft Box Hill Structure Plan and is not supported. There are several larger individually listed heritage properties in Watts Street, Court Street and Kangerong Road. Council is concerned about the impact on these heritage properties from taller buildings that could be permitted under the proposed building heights.</p> <p>The draft Structure Plan was informed by the need to protect key public open spaces and the primary pedestrian network from overshadowing. Similarly, the building heights should stay in proportion with the surrounding development to provide an appropriate transition to less intense development in the</p>

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residential hinterland. Seven storeys along Severn Street are a stark juxtaposition against lower density development beyond the precinct boundary.

Similarly, to the south there are concerns about the permitting of up to 10 stories along Station Street and Canterbury Road. This is unacceptable for a variety of reasons, including overshadowing of adjoining residential properties, compromising access to sunlight and a reduction in the amenity of residential properties. Furthermore, this area adjoins the Combarton Street heritage precinct (HO101) and contains the Alexander Street heritage precinct (HO242) and the William Street precinct (HO212). Additionally, there are properties in Acacia Street and Bass Street covered by the Neighbourhood Character Overlay (NCO2). These precincts, and the properties they contain, along with individually listed heritage properties in the wider area need to be respected. Council is concerned about the impact on these heritage properties from taller buildings.

Likewise, the properties to the west and south of Zetland Road will be affected by allowing up to 6 stories in this area. There is significant concern about the inclusion of Zetland Road within the PSP area, and particularly the transition from more intense development to traditional residential development. Additionally, there is concern about the transition toward properties in Glenmore Street and beyond to the southeast of the precinct.

There should be appropriate height transitions between the precinct and adjoining areas that should not compromise on the amenity of the area or erode the neighbourhood character.

The first and third key directions under “Enhancing Place” are the same. The major asset in the precinct is the Box Hill Gardens yet this will be affected by the construction of the SRL East and potentially SRL North, impacting community space for up to many decades. What provision has been made for permanent new open space and recreation facilities that will support the growing population and workforce? There is a difference between passive open space and that used for recreation, and both need to be recognised and provided for.

It is critically important that public open space not be neglected amongst the vertical nature of Box Hill’s built infrastructure. Council’s analysis concludes that there will be a catastrophic lack of open space per person if investment in new open space is not expedited. Without new open space, the amount per person will reduce from 19m<sup>2</sup> to 7.15m<sup>2</sup> per person. This will be a terrible legacy that the SRL project would leave for the existing and

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	<p>future population and have significant impacts on health, wellbeing, liveability, and amenity.</p> <p>There are existing dormant sites that provide a unique opportunity to investigate the suitability for open space of a significant scale, for example the former Box Hill Brickworks. Whilst this has contamination issues that are still being remediated, Council recommends investigating the use of this site for open space. There is also support for open space along Carrington Road with a connection to the Thurston Street/Nelson Road pedestrian railway crossing. In enhancing the open space network, cool connections between all open spaces should be created to promote walking, cycling and active transport for all ages and abilities.</p>
<p>Empowering Sustainability</p> <ul style="list-style-type: none"> <li>• New buildings should use sustainable practices such as lower carbon material and include renewable energy in their design</li> <li>• Future proof the precinct and plan for new energy technologies</li> <li>• Create a cool and green environment</li> <li>• Embed sustainable water management</li> </ul>	<p>The feedback above for the Burwood station precinct applies equally to the Box Hill station precinct, and wider Metropolitan Activity Centre.</p> <p>Crucially, Box Hill is an established high density urban area, and the urban heat island effect can affect the use of the public realm and open spaces. The mechanisms to create a cool and green environment and integrate sustainable development practices is of critical importance and need to be better articulated with this Key Direction.</p> <p>Council also believes the SRLA needs to collaborate with other Authorities (such as water and power authorities) for ESD projects that can be delivered as part of the SRL project works.</p>

## 5. CONSULTATION

In Council's submissions to the Discussion Paper and draft Precinct Visions, Council requested that a specific report responding to Council's submission be provided to Council ahead of, or with, the release of further documents, as this would help Council to understand the awareness of the project and the community views as the development of the PSPs evolve.

No report was made available prior to the release of the draft Precinct Vision documents. A generic phase one engagement report was made available in April 2024 just prior to the release of the draft Key Directions. This report provided a high level summary of the engagement undertaken by the SRLA. Some feedback was provided at the Key Direction workshops with Council officers; however, Council is still seeking a comprehensive report on the submissions it has already made. To date it is very unclear how any of Council's feedback has been incorporated into the draft Key Directions.

Council is seeking information from the SRLA about:

- How Council's submission and other community feedback on the Discussion Paper and draft Precinct Visions was considered prior to the release of the draft Key Directions,

- How Council can be assured that engagement activities with the Whitehorse community and other stakeholders are effective and meaningful, and
- How the SRLA will collaborate with Council in the PSP process rather than inform Council after developing documents at different stages.

Finally, Council has found the SRLA website difficult to navigate through in order to access relevant information, such as the maps to the draft Key Directions.

## **6. PROCESS, ROLES, AND TIMELINES**

As raised in Council's submission to the Discussion Paper and the draft Precinct Visions, the *Suburban Rail Loop Act, 2021* gives the SRLA powers that directly impact the planning role of Council as a Planning Authority and Responsible Authority under the *Planning and Environment Act, 1987* and introduces a level of uncertainty regarding how the SRLA's powers will be used that may contravene Council's vision for Box Hill and Burwood and ignores the locally relevant issues.

Council has repeatedly requested information about Council's role in the preparation of the Structure Plans. Council, in consultation with the community, has undertaken significant and extensive work in developing the Vision for Box Hill and has updated its Structure Plan, as well as undertaking strategic planning in the Burwood area. Council therefore has intimate local knowledge to contribute and should be used in SRLA's Structure Plan process. Council is therefore to be part of developing those documents. Both authorities should work collaboratively together, to achieve the population shift for a revised version of the work Council has already done.

Council officers continue to experience a good working relationship with the SRLA on other elements of the SRL project, e.g., Initial and Early Works and Main Works. It is therefore concerning that the SRLA's approach to working with Council regarding the structure planning is different. The perception is that the project is being managed in isolation from Council and that engagement with officers and Councillors (and the community) is tokenistic. Whilst the working relationship has improved, Council was particularly disappointed that it received virtually no advance notice of the draft Key Directions that were released.

Council again reinforces our desire to participate more collaboratively in the process to provide intimate local knowledge about Burwood and Box Hill.

## **7. CONCLUSION**

Council reiterates its desire to see a robust and transparent process in place to ensure the structure planning is undertaken with effective community and Council input that genuinely influences the development outcomes of this project.

As discussed throughout this submission, and previous submissions, Council wants to work collaboratively with the SRLA to develop the Structure Plans that meet the aims and objectives of the State Government for the Structure Plan areas, while still achieving long lasting and sustainable outcomes that Whitehorse residents, businesses, visitors, and the Council can be proud of.

The draft Key Directions are inadequate in providing any meaningful information or rationale to support them. The draft Key Directions are an opportunity for the SRLA to flag key initiatives that are specific to each precinct and the SRLA simply has not done this. As a consequence, it will be an extraordinarily big leap from the draft Key Directions into the draft PSP - this is not appropriate, nor fair to the community, for such a significant change to their neighbourhoods.

Council reserves its right to make further submissions at any future advisory committee (or similar) appointed to consider this project and or the subsequent amendments to Whitehorse Planning Scheme to implement the Structure Plans.

## **8. CONTACT DETAILS FOR FURTHER INFORMATION**

### **Vanessa McLean**

Senior Strategic Planner

City Planning and Development

Whitehorse City Council

Email: [vanessa.mclean@whitehorse.vic.gov.au](mailto:vanessa.mclean@whitehorse.vic.gov.au)