

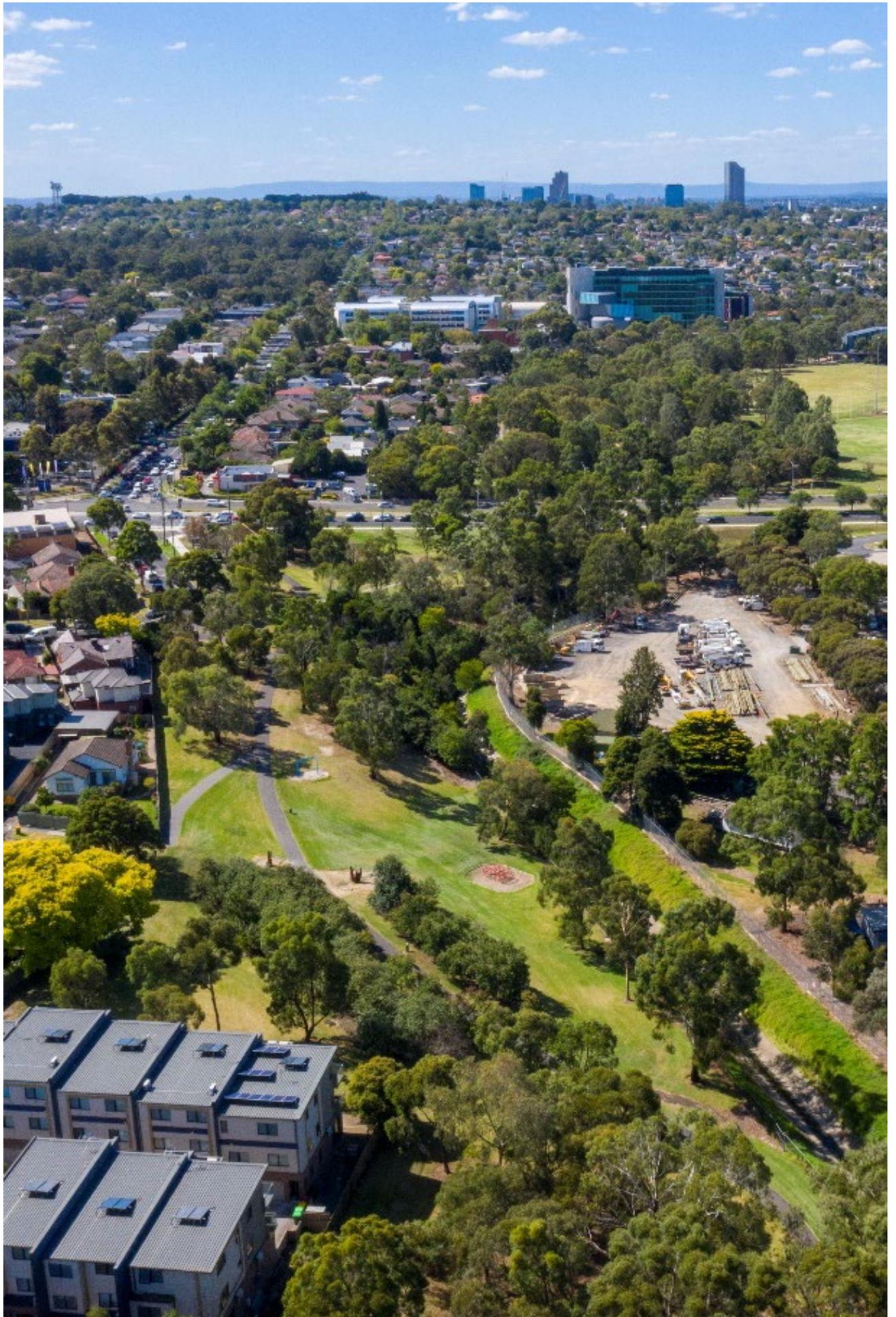
Roma McLaughlin, *Tait's Corner*, 2011. Whitehorse Art Collection © the Artist



Whitehorse City Council submission

Suburban Rail Loop Draft Precinct Visions – Box Hill and Burwood

February 2024



1. EXECUTIVE SUMMARY

Whitehorse City Council (Council) is supportive of the transport benefits that will come from the Suburban Rail Loop East (SRL) project. Council also appreciates the move to a polycentric Melbourne to accommodate significant population growth and agrees that population and employment should be directed where necessary infrastructure and community facilities exist.

The Suburban Rail Loop East Draft Precinct Vision documents contain 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 SRL East Precinct Visions for Box Hill and Burwood highlight areas of support as well as concern. The key matters include:

1.1 General matters

- Council has significant concerns regarding project governance matters and reiterates the request for the SRLA to take a collaborative approach with Council to develop the Structure Plans.
- Clarification is sought regarding the 15 year precinct planning timeframe, which does not correspond to the projected population and employment figures (which are to 2056).
- Detailed information is requested about how the provision of the required community and development infrastructure will be funded.
- The Vision documents provide reasonable levels of detail regarding housing and employment opportunities however provides limited information that quantifies and locates the additional infrastructure needs such as but not limited to open space, sporting facilities, community facilities and education (early years, primary and secondary). Council's Development Contributions Plan (DCP) has not factored in the growth and development projected by the SRLA. As such, the current DCP will not cover the infrastructure costs to come out of these Structure Plans. In addition, the Vision documents failed to identify and show the suitable locations to provide the required community facilities nor provide any mechanism to acquire the required land for the provision of required community facilities. This detail is critical for the Structure Plan. More accurate representations are requested of the expected development to be included.
- The artist impressions and imagery used in the Draft Precinct Visions are modest when compared to the diagrams depicting the change types and therefore may not demonstrate what would be commonplace for each of the precincts.
- Clarification is requested regarding the extent of the higher change areas depicted on the draft precinct maps beyond the arterial roads. The coloured, shaded areas mapped for land use activities and notional built form typologies and heights seem to be purposely blurred and need further interrogation.

1.2 Burwood

- Council supports some level of increased density along arterial roads such as Burwood Highway however the extent of change beyond arterial roads is unclear on the maps and is concerning. The land beyond the Burwood Highway corridor quickly transitions to traditional residential development and Council supports maintaining these as areas for low and medium density development.

- There is support for enhancing the education and commercial precincts however further details are requested to understand how the issues and opportunities are being addressed, particularly the legacy of existing industrial uses.
- Council's preference for the Burwood precinct is for a corridor approach rather than a radial approach.
- There are opportunities to amplify the importance of Gardiners Creek (Kooyongkoot), pedestrian and cycling connections, enhancement of the tree canopy, biodiversity, open space, and link to First Nations cultural values.

1.3 Box Hill

- The draft Precinct Vision for Box Hill incorporates many of the ideas contained in Council's draft Box Hill Structure Plan. Council supports the elements of the Vision that align with Council's strategic planning for the area.
- The SRL Vision needs to incorporate inclusive language that acknowledges the diverse communities within Whitehorse without highlighting specific groups. The Vision references "a cultural melting pot" but then only mentions "a marketplace for Asian food" and the "Chinese community".
- The strategic work undertaken by Council consistently reinforces that Box Hill is the preeminent urban centre for Melbourne's east however this is not reflected in the SRLA's Vision.
- The Vision does not recognise that the Box Hill Metropolitan Activity Centre is a regionally significant health and education precinct, nor that Box Hill has a substantial visitor economy.
- The 'Opportunity Areas' are generally supported as they align with the neighbourhoods described in Council's draft Box Hill Structure Plan. Council is however concerned that the significant and higher change areas extend considerably further south than the current Metropolitan Activity Centre boundary and into areas of traditional residential development, some of which are controlled by heritage and neighbourhood character overlays in the Whitehorse Planning Scheme.
- The Vision does not demonstrate how the existing and new residents and employees in Box Hill will have access to high quality public open space. The current facilities will not be adequate to meet the State Government population projections with Council estimating that the amount of open space will reduce from 29m² per person to 5.9m² which will have significant negative impact on the liveability and wellbeing of current and future communities.
- Many of the preliminary ideas are reflective of the strategic direction outlined in Council's draft Box Hill Structure Plan, however there is a lack of information to demonstrate how they would contribute to improved community outcomes.

The SRL East is a critical city-shaping project affecting the community, Council, and agencies. Council reiterates its desire to see a robust and transparent process in place to ensure the structure planning is undertaken with effective and inclusive community and Council input that genuinely influences the development outcomes of this project.

Council has not received a formal response from the SRLA about its submission to the SRL Precincts Discussion Paper submitted in October 2023, which reinforces Council's request for transparency. Nor has it seen a comprehensive review of the feedback received - only high level themes.

Lastly, Council seeks effective collaboration throughout the project to allow for the opportunity to genuinely influence the direction and outcomes.

1.4 Recommendations

Council is eager to work collaboratively with the SRLA to develop the Structure Plans that 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.

Council requests the following:

1. That no decision on the Vision Statements for the Box Hill and Burwood Structure Plans be made until the outstanding issues raised in Council's submission are resolved to the satisfaction of Council.
2. A meeting between the Minister for Planning, the Mayor, and Council's CEO be held to discuss Council's concerns with the Draft Vision Statements, community consultation, collaboration with Council, and an appropriate approach towards resolving the outstanding issues prior to proceeding with the remainder of the project, and
3. To work with the SRLA in resolving the relevant outstanding issues raised in Council's submissions prior to drafting of the Structure Plans and any Planning Scheme amendment documents.

2. INTRODUCTION

This submission outlines comments from Council relating to the Suburban Rail Loop East Draft Precinct Visions for Box Hill and Burwood [2023].

It also expresses Council's comments regarding procedural, and community and stakeholder engagement relating to the overall SRL East structure planning projects within the City of Whitehorse.

3. GENERAL COMMENTS ON THE DRAFT PRECINCT VISIONS

Council acknowledges the importance of the Draft Precinct Vision reports in progressing the structure plan process, and notes (p.22) that the preliminary ideas it contains are a "*starting point*". In a similar vein, p.18 states that the final Structure Plan will include "*a final Draft Precinct Vision that reflects feedback provided on this document*". Council therefore assumes that these ideas and plans are not set, are intended to prompt discussion, and can evolve and change through the structure plan process. Council seeks assurance that this will be the case.

Some of the concepts included in the Draft Precinct Vision reports are broadly consistent with existing strategic work that Council has undertaken, particularly for Box Hill. However, the Draft Visions contain motherhood statements, and Council questions the assumptions and expectations that stem from these statements.

The Draft Visions need to be clear, concise, meaningful, realistic, and achievable. There is also duplication across the priority outcomes, themes, ideas, and opportunity areas, where generic information is applied to very different locations like Box Hill and Burwood. The approach should be more customised and specific to each precinct.

It is unclear what the purpose of the slogans on p.17 (in both documents) are when compared to the Vision statements. This should be clarified.

3.1 Existing local policies and strategies

The *Whitehorse 2040 Community Vision (2020)* and the *Council Plan 2022-2025 (2022)*, articulate the aspirations of the Whitehorse community and serve as guiding frameworks for Council decision-making and initiatives. These strategic documents were developed through extensive community engagement, reflecting the collaborative input of residents, businesses, and visitors.

Council encourages the SRLA to integrate the themes outlined in the *Whitehorse 2040 Community Vision* into the Structure Plans for Box Hill and Burwood to enable unified visions between State and local planning documents.



1 Whitehorse 2040 Community Vision themes

Significant strategic work has been undertaken by Council including, but not limited to, the review of the existing *Box Hill Structure Plan, 2007*, the preparation of the *Whitehorse Housing 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 draft Visions for Box Hill and Burwood do not successfully align with the vision and strategic directions from these strategies.

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 regarding 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.

3.2 Unclear plan timeframe and reach

Council requests clarification regarding the 15-year timeframe referred to in the Draft Precinct Visions as it is not the same timeframe as the SRLA’s projected population and employment figures (which are to 2056). The vision needs to be realistic to its planned timeframe. It is unclear whether the Draft Precinct Visions, for example, represent 15 years (as per p.18 in both documents) or 30+ year possibilities for growth and change.

Phrases such as “*in the longer term*” on page 18 in both documents are also very vague. Does this refer to 15 years hence (the Structure Plan timeframe), or to 2056?

The forecast figures provided do not enable an understanding of the current state compared to the projected state. This is important in conveying the quantum increase of population and employment. A small table would have been helpful.

The reach of the Vision and ultimately, the Structure Plans, need to be clear. The Vision documents outline an initial focus on a 10-minute walking distance (which should also reference an approximate km distance) as the extent of influence from the SRL stations. The documents include statements such as “*the full precinct, extending around 1,600m from the station will evolve over time and will be guided by the Draft Precinct Vision*”. The documents do not however clarify if the wider areas will be subject to a community led review of the Structure Plans or if, and there is concern that, the Minister for Planning has authority to make decisions within the wider declared planning areas

without formal refinement of the Structure Plans. This again leaves the extent of change ambiguous and uncertain for communities. If change is proposed for additional areas the Structure Plans should be formally reviewed.

Council queries the peripheral inclusions in the declared planning areas e.g., Laburnum, Canterbury/Station, Wattle Park, Mont Albert, and requests further discussion on the logic of including or excluding certain areas. Some peripheral areas, such as Wattle Park and Laburnum have character considerations that distinguish them from the immediate station precincts.

Council suggests that the Structure Plans explore elements of the Missing Middle¹ concept and opportunities as part of addressing housing supply, housing affordability and social housing issues. For example, the Missing Middle advocates for (amongst other things) consistent, low to medium scale development, of moderate intensity (up to 6 storeys) in locations identified for increased density. Both precincts provide the opportunity to explore this idea.

3.3 Social infrastructure comment is inadequate

There is an absence of substantial information in the Vision documents regarding social infrastructure or services to meet the needs of the projected population, businesses, and workers. The Visions focus on how and 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 or no 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.

3.4 Implementation - Funding and delivery concerns

There is no mention about how the provision of the required community infrastructure and development infrastructure indicated in some of the draft ideas 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.

Council, under its municipal wide DCP has commitments to deliver many infrastructure projects over the next 20-year period. Council must find funds to pay the balance of costs for each of the DCP projects. As such, Council will not be able to commit to deliver more infrastructure that are not costed nor factored in the current DCP. The provision of the required infrastructure that is to be provided by these Structure Plans, must be provided by the SRLA or other State or Federal agencies

1

https://researchmgt.monash.edu/ws/portalfiles/portal/296610274/The_Missing_Middle_increasing_the_density_and_diversity_of_housing_in_Australia_suburban_cities_Damian_Madigan_National_Housing_Conference_2019_Darwin.pdf

<https://thefifthestate.com.au/columns/spinifex/why-have-we-failed-to-implement-a-viable-missing-middle-strategy/>

<https://architectureau.com/articles/in-which-the-middle-goes-missing/>

and not shifted onto Council. In a rate capping environment, Councils do not have the funds to support infrastructure delivery arising from the Structure Plans.

Council strongly suggests that through these Structure Plans, the SRLA 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 mechanism 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 to Council.

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 completed). These details will need to be reviewed and scrutinised by Council's subject matter experts. While it is appreciated that the SRLA intend to present these to the community with later iterations of the Structure Plans, it is considered that comprehensive comments on the Visions cannot be provided without providing higher-level overview of the ultimate plans and how, when and by whom will they be delivered.

3.5 Misleading artist impressions

The artist impressions used in the Draft Precinct Visions are modest when compared to the diagrams depicting the change types and therefore may not demonstrate what would be commonplace for each of the precincts. Council believes the imagery could be misleading and more accurate representations of expected development should be included. For example:

- The Box Hill impression (p 22) shows a pedestrian mall with a low-rise street wall and deep upper level setbacks on the right hand side. It is unclear if this image is intended to represent Market Street or the new pedestrian promenade between Whitehorse Road and Box Hill Gardens. Given the Draft Vision for the two areas are quite different (one being surrounded by Significant Change and the other by Higher Change), it could lead to a misunderstanding of what could be expected within Box Hill.
- The Burwood impression (p.19) along Gardiners Creek looking north to Burwood Highway shows a modest building (6 levels) in the significant change area. Subject to more detail, Council supports lower rise development near the creek interface in the station precinct but is concerned that there will be a more intensive outcome at sensitive locations like this that will impact the important creek environs. Noting the dominant steps (and what appears to be a lift) in this image, Council is keen to ensure that the station precinct and areas around Gardiners Creek can be used by all people including people with limited mobility all the time.

3.6 Mapping issues

Council queries the legend on the Draft Precinct Plan maps (p.20):

- What do the big arrows on the maps display? Is it indicating potential growth of the boundary beyond the 1.6km or simply noting these are arterial road corridors. Council seeks information be added to the legend or the arrows be deleted.
- The points of interest / activity symbols are difficult to read (including the SRL station location) and some seem to be randomly placed. Council questions their accuracy and requires greater clarity with these symbols on the maps.
- The change areas shown on the Draft Precinct Plans are vague and ambiguous (see further discussion below).

3.7 Vague change areas

The extent of the higher change areas depicted on the Draft Precinct Plan maps is substantial and Council is concerned about the extent of this area beyond the arterial roads. The coloured, shaded areas mapped for land use activities and notional built form typologies and heights seem to be purposely blurred and will need further refinement. The change area descriptions themselves are vague and should specify a height range in metres and storeys. We note that the artists impressions for the change areas are understandably different for Box Hill and for Burwood however this might not be apparent to the community when each report contains so much generic content.

In addition, the extent of the change areas shown on the Draft Precinct Plans do not match with the Opportunity Areas maps, for example, the Box Hill Opportunity Areas do not extend southwest of the Elgar Road/ Whitehorse Road intersection, however the Draft Precinct Plan shows these as Medium Change areas. This brings uncertainty to the process and requires explanation.

3.8 Statutory implementation

Whilst the Vision documents should represent the commencement of the precinct planning, Council assumes consideration has already been given to the statutory and non-statutory mechanisms to implement the Structure Plans. Under the *Planning and Environment Act, 1987*, Council being the default Planning Authority and the Responsible Authority for the City of Whitehorse, 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 controls to be implemented.

4. BURWOOD – DRAFT PRECINCT VISION – SPECIFIC COMMENTS

4.1 Burwood Draft Vision statement (p5)

In the Vision statement:

- Gardiners Creek and its environs is referenced several times and Council concurs that is a central piece in the identity of the Burwood precinct. However, it concerns Council that the SRLA is placing considerable emphasis on, and simply leveraging off, this significant natural asset to deliver amenity for the whole precinct instead of looking for additional environmental and recreational initiatives to support liveability.
- Gardiners Creek (Kooyongkoot) is also of significant First Nations cultural value which has not been reflected in the Vision statement.
- There is a lack of reference to high quality design of buildings and the public realm and to environmental matters (beyond reference to Gardiners Creek).
- Paragraph 3 states: *“A vibrant urban centre will emerge around the new SRL transport hub...”*; *“will provide everything locals need”*; and *“great cafes and restaurants, providing spaces to work and a unique destination to meet in the evenings and on weekends.”* The Vision document fails to identify the community infrastructure needs of the projected population and does not describe how the precinct will meet all the community’s needs.
- The Vision has overlooked important linkages along the Burwood Highway corridor to Burwood Village to the west and to the Tally Ho Major Activity Centre (MAC) and beyond to the east. This route also takes in Greenwood office park, Burwood Heights MAC and Burwood One shopping centre. Collectively this string of centres will genuinely provide *“everything locals need”* within easy access via tram Route 75.
- Paragraph 4 refers to *“new services and amenities”* for Burwood Highway and Highbury Road, however it is unclear what these are.
- The phrase *“seamlessly connected”* in paragraph 5 needs to expand beyond Gardiners Creek. There must also be a focus on east-west connections to facilitate walking and cycling trips to the new station and other destinations within the precinct.
- Relocate paragraph 9 relating to Gardiners Creek below paragraph 6.

4.2 Priority Outcomes

Council provided comments regarding the Priority Outcomes in the submission to the **Discussion Paper**. Feedback from the SRLA on the comments has not been received to date, and Council’s view remains unchanged. The comments are reiterated, and in some cases expanded upon, below.

Priority outcome	Whitehorse City Council comments
Diverse housing options	<p>Council supports housing diversity particularly when higher density is located on tram and road corridors, namely Burwood Highway, leaving local streets with low and medium density housing. Refer to the Residential Corridors Built Form Study, Neighbourhood Character Study and Housing Study for further information. Council considers that the redevelopment along Burwood Highway envisaged in this study is well underway.</p> <p>All housing densities should offer more affordable, accessible, and social opportunities.</p> <p>Diverse housing options should also consider valued neighbourhood character elements. Refer to Council’s Neighbourhood Character Study for further information.</p>
Enhanced environment and biodiversity	<p>Council supports the prioritisation of actions that enhance the environment and biodiversity, social connectedness, as well as health and wellbeing. However, clear strategies should be provided as to how these will be achieved. Beyond Gardiners Creek naturalisation and enhancement of existing park environs, other aspects such as ESD, increased tree canopy throughout the precinct and actions toward climate resilience are important. Council would like the SRLA to provide evidence as to how the Structure Plan will assist with greening Burwood to address issues such as increasing the tree canopy and reducing or pausing the urban heat island effect.</p>
Capacity for future employment and industry	<p>Council supports the opportunity to align future jobs with skills training through Deakin University, as well as linking to the nearby Box Hill Institute within the SRL Box Hill precinct.</p>
More diverse, high-value jobs	<p>Council seeks more information about the SRLA’s focus on ‘high value’ jobs.</p>
Increased cycling and walking connections	<p>Council would support expanding this priority to include public transport connections and ensuring all transport options encourage safe behaviour, are accessible for all, are environmentally friendly and promote health and wellbeing. Where applicable pedestrian priority areas should be identified and upgraded accordingly.</p>

4.3 Precinct Themes

The draft Vision document states that *“each precinct is different”*, however each precinct has the same generic themes. Council believes that this could mislead the reader into thinking that the themes presented are specific to Burwood. Specific unique and justifiable themes should be developed for each precinct.

Council’s comments regarding the themes are outlines in the table below.

Precinct Theme	Whitehorse City Council comments
Boosting the Economy	<p>Council would like more information about the assumptions underpinning the growth scenarios that the employment figures are based on within the Burwood precinct.</p> <p>There is 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.</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. Council 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 applied to the Structure Plan areas.</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>
Enriching Community	<p>Council supports creating healthy and inclusive neighbourhoods; however, it queries how this can be achieved by the precinct planning. One suggestion is <i>“enabling diverse and affordable housing choices and tenure models that support liveability for a growing community.”</i> What mechanisms does the SRLA propose for the Burwood precinct, given its high student population?</p> <p>In regard to <i>“enhancing recreational assets”</i>, while it is pleasing to see that existing recreational assets are suggested to be “enhanced”, there is a significant need for additional recreational and open space facilities. Doubling the population and number of employees with the same number of open spaces is not sustainable, nor will enhance liveability within</p>

	<p>Burwood. More open space is needed. Further, Council queries the reference to 'green space'(p18). Does this mean public open space?</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.</p> <p>There is opportunity to include indigenous design and planting throughout the SRL project and specific consideration should be given to this in the precinct's buildings, play and open space designs. This approach is supported by the Whitehorse Community Vision, where the community has expressed interest in developing knowledge and understanding of Aboriginal history and culture. Council is interested in the ongoing feedback the SRLA receives from Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation as it progresses with the structure plan projects.</p> <p>The draft Precinct Plan identifies a key cross precinct connection through the section of Lundgren Chain that currently does not connect to Gardiners Creek. Council supports the SRLA securing this connection.</p> <p>Scott Grove public open space is not marked on the map. This needs to be revised.</p>
<p>Better Connections</p>	<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.</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 would like to see safe and secure connections across Burwood Highway, between the station precinct and Deakin University. This would not only benefit the student population but encourage mode shift to active transport.</p> <p>Visioning for the projected resident and employment populations and associated developments must consider the impacts on car parking within local streets and whether the local street infrastructure is suitable to cater for additional traffic.</p>

	<p>This precinct provides an opportunity to enhance the paths along Gardiners Creek. Boroondara and Stonington 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>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.</p> <p>Greater attention could be given to more “potential enhanced corridors” along roads than shown in the Draft Precinct Plans for pedestrian amenity (Enhanced Community theme) and better connected spaces and activity hubs.</p>
<p>Enhancing Place</p>	<p>Council supports this theme; however, the document does not include any information about built form and design including how individual buildings will interface, 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.</p> <p>As well as the existing planning scheme provisions, Council prepared the <i>Whitehorse Residential Corridors Built Form Study</i> in 2019. This reviewed the built form controls along the Burwood Highway corridor and ultimately resulted in Amendment C220 which intends to introduce Schedule 11 to the Design and Development Overlay. This Amendment is currently with the Minister for Planning for approval.</p> <p>Council supports measures that will enhance safety (particularly at night) as well as vibrancy and amenity.</p> <p>There are opportunities to amplify the importance of Gardiners Creek (Kooyongkoot) and its links to First Nations cultural values in the area.</p> <p>The post settlement history of the area also needs acknowledgement, including the Burwood SRL station being the site of the first drive-in theatre in Australia.</p> <p>Creating opportunities for new public recreation and community spaces is vital and consideration should be given to the role that a repurposed Mt Scopus site could bring if the school decides the 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).</p>

Empowering Sustainability	<p>Council supports mechanisms to respond to the impacts of climate change. Additional information is requested as to how the SRLA proposes to achieve the examples provided in the draft Vision document, e.g., how will the Structure Plan enable “<i>reductions in energy consumption</i>” and “<i>foster responsible use of resources</i>”?</p> <p>Overall, the Draft Precinct Vision Paper contains limited guidance on sustainability and the environment. Indeed, it seems absent from “Figure 3 – Interaction between the three SRL objectives”.</p>
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4.4 Burwood Draft Precinct Plan



2 Burwood Draft Precinct Plan, source: Suburban Rail Loop East, Draft Precinct Vision - Burwood, 2023

What kind of change could this include?

Future planning for Burwood will provide a great opportunity to deliver more housing where people want to live, with high design standards in great places close to local schools and Deakin University.

SRL will better connect Burwood with the rest of metropolitan Melbourne - creating the right conditions to attract investment in new job opportunities, and unlocking new spaces to boost housing supply.

Targeted and detailed precinct planning will consider the different character, strengths, and opportunities for each of the local neighbourhoods. **Medium Change** areas will provide opportunities for more incremental residential growth, providing quality social and affordable housing, well-designed townhouses and smaller scale apartments in appropriate locations.

Enabling more housing diversity in highly accessible areas will be a priority for Burwood. **Higher Change** areas, particularly along Burwood Highway, Elgar Road and Highbury Road, will provide new homes in well-designed apartments at varying heights.

Significant Change will be targeted to the areas nearest to the new SRL station. As a mixed-use centre with access to the university campus and high-quality open spaces, it will support more homes, job opportunities and local services for the growing community.



Figure 6: What the change areas could look and feel like in the future.

3 Indicative illustration of change, source: Suburban Rail Loop East, Draft Precinct Vision - Burwood, 2023

The Burwood Draft Precinct Plan shows some significant ideas. Some of the general comments regarding the Draft Plan include:

- As discussed earlier in this submission, Council seeks clarification regarding the exact boundaries of different change areas marked on the above map. The map contains blurred edges; this is confusing for the community and for Council. Unclear mapping can also cause technical difficulties at the planning scheme amendment stage, as planning maps should show clear boundaries of areas affected by the proposed change.
- Council queries the peripheral inclusions of Wattle Park and requests further discussion on the logic of including this area.
- Wattle Park Neighbourhood Activity Centre is included within the precinct boundary however there is no supporting information within the document as to plans for its enhancement. Elgar Road and Riversdale Road might be able to support additional development, but Council does not believe it could be as much as that envisaged around the station, given the residential character of these areas. Council also queries how the built form might transition to areas of open space e.g., Elgar Road up to Wattle Park given Wattle Park has character considerations that distinguish it from the immediate station precinct.
- Improvements need to be made to the north/ south Elgar Road public transport connection to SRL Burwood station.
- Completing Lundgren Chain through to Gardiners Creek is supported, as shown on the plan as a 'Key Cross-precinct Connection'.

4.5 Burwood Preliminary ideas

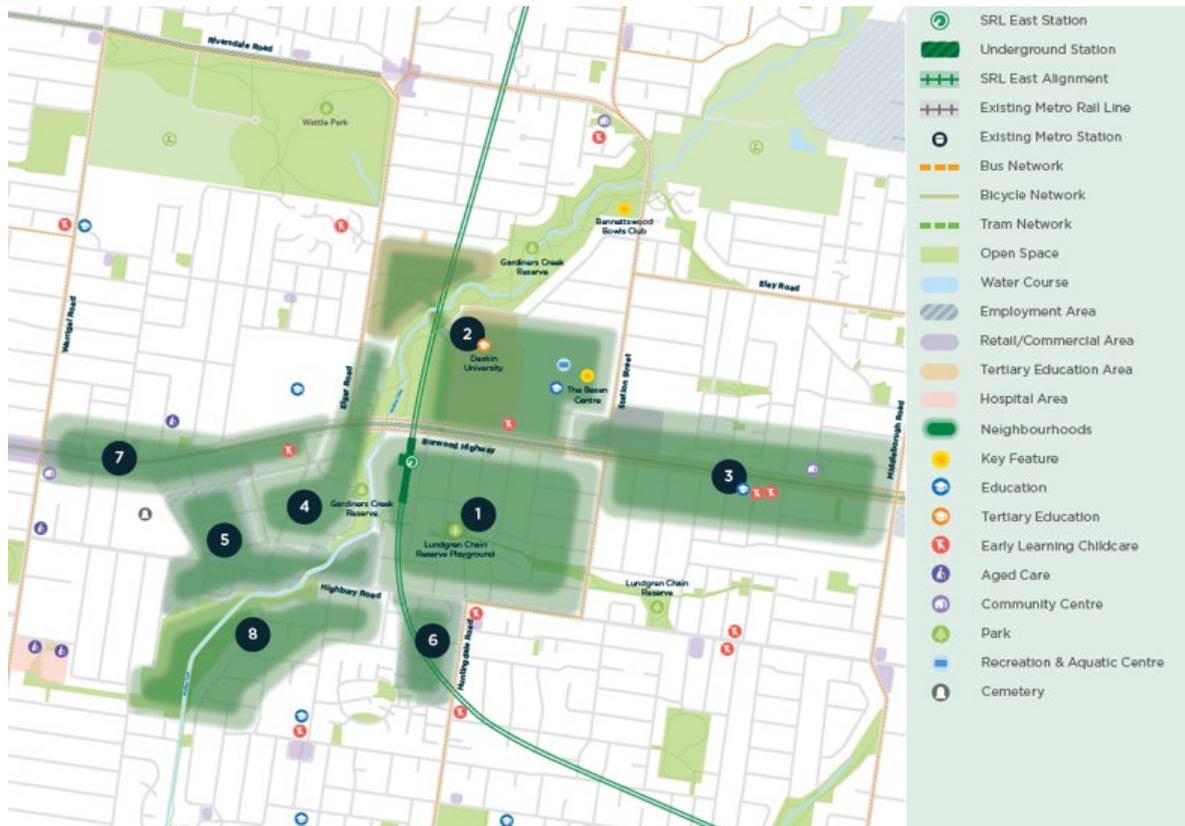
Council's comments regarding the preliminary ideas for the Burwood Precinct are outlined below.

Preliminary idea	Whitehorse City Council comments
<p>Embrace the opportunity presented by the new SRL station to establish a new mixed-use centre.</p>	<p>The Burwood precinct does not present visually, physically, or spatially as one 'traditional activity centre.' Instead, it presents as a collection of a wide variety of different land use activities (and built forms in terms of both scale and style) spread across a large area around Burwood Highway, Station Street, Elgar Road, and Highbury Road. It is not cohesive.</p> <p>Council's preference is for creating an east-west linear corridor along Burwood Highway, including the station precinct, instead of extending north-south into the traditional hinterland areas around the proposed station. The east-west corridor provides an opportunity to explore the Missing Middle concept in this Structure Plan area and would be consistent with Council's Residential Corridors Built Form Study.</p> <p>Council acknowledges the investment needed to support and anchor the new station location, but this is unlikely to contain everything needed to sustain the nearby community. The uses and development need to be carefully planned in concert with the offer at the several other activity centres (which includes two Major Activity Centres) along the east-west Burwood Highway route, including Burwood Heights Activity Centre and Tally Ho Activity Centre. These activity centres vary in size and function – each has a different identity that serve the needs of the local area.</p>

<p>Extend and enhance the natural features of Gardiners Creek</p>	<p>Council supports the continuation of naturalising Gardiners Creek through to at least Highbury Road (preferably well beyond, into the City of Monash).</p> <p>Gardiners Creek is a significant waterway that needs protecting from overdevelopment and therefore there needs to be a balanced approach in connecting corridors/ improved spaces that consider improving biodiversity, wildlife, and the waterway. Any consideration of the creek corridor also needs to be cognisant of community safety outcomes. The draft Precinct Plan shows areas of 'higher change' abutting the Gardiners Creek corridor. Council is concerned about the development flanking Gardiners Creek Reserve and any higher change along the park interface. This is not supported without further discussion with Council.</p> <p>If there is a significant increase in housing and population along the creek Council is unsure that this would be a positive outcome on the waterway. Council is also interested in seeing the flood modelling projections for Gardiners Creek.</p> <p>Council seeks information about how the precinct planning process interfaces with the Planning Controls for Waterways program being developed by the Department of Transport and Planning.</p>
<p>Enhance Burwood Highway, Highbury Road, and Elgar Road corridors activity</p>	<p>Council reiterates its preference for a corridor approach and links to other activity areas. Council would like to understand the extent of the change areas, particularly the depth from Burwood Highway. Equally, Council seeks clarification of the planned uses and depth of the Elgar Road corridor development.</p> <p>There is limited east-west cycling connections in this area. The enhancement of the Burwood Highway corridor needs to have consideration for improved cycling and walking to promote mode shift to active transport.</p> <p>Options could include Council's Easy Ride Routes with the addition of safe arterial road crossings, such as Station Street at Lundgren Chain. Highbury Road should be considered for safe cycling facilities.</p> <p>Any enhancement of the corridor should include an increase in tree canopy to support Council's Urban Forest Strategy. Furthermore, it is important to highlight connections to existing corridors and to enhance green corridors with a priority along Gardiners Creek.</p>
<p>Support the growth of the education precinct</p>	<p>Council supports the growth of the education precinct, centred around Deakin University, however this area currently has limited activity at night. Council therefore recommends highlighting safety and activation of public spaces at night as a key principle.</p> <p>Council queries the inclusion of the Mount Scopus Memorial College site. The Draft Vision report remains fairly silent on the opportunities, though pointing to it being part of an expanded education and research precinct. If the school did relocate, this site should include public use of the open</p>

	spaces, recreation facilities and, if suitable, use of the existing cultural facilities (e.g., theatre).
Support job growth across the precinct	<p>The employment areas seem very fragmented, and Council would like to know what the SRLA would do to make the precinct more cohesive, including across municipal boundaries.</p> <p>Further analysis needs to be conducted about the demand for industrial land uses in the area. As outlined in the <i>Whitehorse Industrial Strategy</i>, the municipality has limited industrial areas which Council seeks to protect, therefore the precinct plan needs to be clear about what activity will be supported in the limited industrial areas. Alternatively Council needs to understand where new industrial 1 zoned land will be located to replace currently zoned industrial land if this is rezoned commercial or mixed use. State level industrial land strategies seek to ensure that industrial land within metropolitan Melbourne is protected rather than removed, as it plays a significant role in the broader economy and operation of the city.</p> <p>Council brings to the SRLA’s attention that, if any existing industrial areas are proposed to be rezoned for sensitive uses, necessary contamination investigations and analysis must be undertaken as per the requirements of the <i>Ministerial Direction 1 – Potentially Contaminated Land</i> and the requirements of the Environment Protection Authority (EPA), prior to any rezoning, and not leaving this issue to be addressed at a later stage by Council and landowners.</p> <p>It is difficult to determine where the existing retail precincts sit on this map. This would need to be updated to realistically explore opportunities and challenges.</p>
Enable greater housing choice	<p>Council supports greater housing choice particularly when higher density is located on tram and arterial road corridors, principally Burwood Highway, leaving local streets with low and medium density housing. Refer to the Residential Corridors Built Form Study, Neighbourhood Character Study and Housing Study for further information.</p> <p>Council also supports including social and affordable housing in the mix.</p> <p>The SRLA could play a role in supporting lot consolidation to maximise the development potential along the Burwood Highway corridor and achieve better design outcomes. The interface with lower change areas needs to be carefully considered and appropriate planning controls in place.</p>

4.6 Burwood Opportunity areas / Neighbourhoods



4 Opportunity Areas, source: Suburban Rail Loop East, Draft Precinct Vision - Burwood, 2023

Council provides the following comments regarding the Burwood Opportunity Areas.

Opportunity area	Whitehorse City Council comments
1. New Burwood central area	<p>The Draft Vision document correctly identifies that this area is currently typified by low rise detached dwellings, and therefore Council queries the extent and type of growth expected in this area.</p> <p>Council is not supportive of this location as the central activity area with the level of change across the neighbourhood depicted on the Draft Precinct Plan. Beyond the land included in the RGZ along the Burwood Highway corridor it quickly transitions to traditional residential development. The <i>Whitehorse Residential Corridor Study</i> recognises increased development along the corridor but aims to protect the lower density development in the corridor hinterland.</p> <p>Whilst it anticipates that this area will benefit from being highly accessible to the SRL station, it does not acknowledge that Lundgren Chain is disconnected from the SRL station at its closest point unless there is property acquisition to connect it.</p>

2. Central Campus	<p>Council supports the growth of the education precinct, centred around Deakin University and better activation of the University to Burwood Highway. However, Council queries the inclusion of the Mount Scopus Memorial College site as previously discussed. The precinct planning should not hinge on the future potential relocation of the College, given this is not guaranteed.</p> <p>What does “diverse” accommodation mean in the context of this neighbourhood? Is it student housing, affordable housing and /or diversity of dwelling typologies? Council notes that the development of purpose built student accommodation has declined in favour of standard apartments suitable for student rental.</p>
3. Burwood Highway East	<p>Council supports the growth of the corridor to the east, which reinforces the <i>Whitehorse Residential Corridors Built Form Study</i>. Council notes the significant growth that has already occurred on Burwood Highway on consolidated lots. The Vision document correctly notes that there is a particular focus on student housing.</p> <p>Council queries the depth of this corridor beyond Burwood Highway and the extent of the growth expected.</p>
4. Station West	<p>Gardiner's Creek is already under significant pressure, therefore there is a need to consider what future impact increased housing will cause on the natural environment, especially at the park interface, and the need to temper growth expectations.</p> <p>South of Burwood Highway may warrant investigation into a land assembly, mixed use outcome to complement and transition to the employment areas.</p>
5. Burwood Economic Cluster	<p>Council supports this opportunity area, but as above further analysis needs to be undertaken about the demand for industrial land uses in the area. Council seeks to protect the limited industrial areas in the municipality; therefore, the structure plan needs to be clear about what activity will be supported in this precinct.</p> <p>This neighbourhood should recognise the need for better and clearer connection to the SRL station.</p>
6. Highbury Enterprise Precinct	<p>Council supports the opportunity to align new local enterprises, startups, and incubator spaces with Deakin University. The planning of this precinct requires collaboration between Whitehorse Council, Monash Council and the SRLA.</p>

<p>7. Burwood Highway West</p>	<p>Council supports the growth of the corridor to the west but queries the termination of the neighbourhood at Warrigal Road. Council suggests the SRLA consider the merit for continuation of the corridor as more holistic and strategic planning exercise, particularly given this strip shopping centre already exists with a relatively strong commercial viability. The boundary of the SRL precinct structure planning should not occur based on administrative or political boundaries (such as a municipal boundary or electorate boundaries).</p> <p>Council queries the depth of this corridor beyond Burwood Highway and the extent of the growth expected, particularly given the location of heritage overlays and the design and development overlays, but notes that it seems deliberately narrower than Opportunity Area 3 that extends to the east. Council would like to understand the rationale.</p> <p>There is limited information for this Opportunity Area which does not allow more detailed feedback.</p>
<p>8. Creekside Neighbourhood</p>	<p>As above, Gardiner's Creek is under significant pressure and there is a need to consider the impacts on the natural environment, instead of simply leveraging off this asset.</p>

5. BOX HILL - DRAFT PRECINCT VISION – SPECIFIC COMMENTS

Council is fully cognisant of the significance of Box Hill in the wider metropolitan context. It has long held the status of being the preeminent centre in the eastern region of Greater Melbourne. Council has been deliberate in its planning of Box Hill to meet its potential and to ensure a comprehensive approach to planning is undertaken, given the area will experience growth and development from the SRL as well as other key sites, such as those owned by Vicinity Centres.

As highlighted in Council's submission to the Discussion Paper, one of Council's key strategic documents is the draft Box Hill Structure Plan (BHSP), which reviewed and built upon the existing Box Hill Transit City Activity Centre Structure Plan. The BHSP acknowledges the significant growth and demographic change that is predicted to continue within this Metropolitan Activity Centre and prepared built form controls through an Urban Design Framework (UDF) that would balance the predicted growth with appropriate built form and public realm treatment in a very comprehensive way. The work represented a significant cost to Council and the ratepayers of the City of Whitehorse.

Despite Council preparing the BHSP and UDF well in advance of the announcement of the SRL project, the Minister for Planning has refused to advance the documents through the Planning Scheme Amendment process at this time, largely based on the SRL Precinct Planning work to come. Nonetheless, this was a significant undertaking by Council that included engagement with a wide range of stakeholders in the Box Hill area and therefore the draft BHSP and draft Box Hill UDF still represent the contemporary vision and directions Council sees for the built form, public spaces, movement, and transport in this Metropolitan Activity Centre.

5.1 Box Hill Draft Vision statement (p5)

Council officers the following comments regarding the Vision statement:

- The draft Vision should consider inclusive language that shows an acknowledgment of the diverse communities within Whitehorse without highlighting specific groups. Box Hill, and more broadly Whitehorse, is a multicultural community and this should be reflected in the Vision.
- The Vision references *"a cultural melting pot"* but then only mentions *"a marketplace for Asian food"* and the *"Chinese community"*. A cultural melting pot is a location to share experiences, traditions and build a sense of community and is far greater and deeper than a marketplace for food and one culture. Box Hill is a place for everyone. It is suggested that paragraph 2 read *"The centre of Box Hill is already the generous heart of the community that celebrates Victoria's diversity"*.
- The work undertaken by Council consistently reinforces that Box Hill is the preeminent urban centre for Melbourne's east however this is not reflected in the Vision.
- While acknowledged within the body of the document, the Vision statement does not recognise that the MAC is a regionally significant health and education precinct, or that Box Hill has a significant visitor economy.
- Reference to design excellence for buildings and public spaces should be included.
- The draft vision does not speak to the environment, for example - amenity, trees, and climate resilience, built heritage or parkland.

5.2 Priority Outcomes

Council’s view of the Priority Outcomes remains unchanged from those presented to the SRLA in the submission to the **Discussion Paper** in October 2023. They are reiterated and, in some cases, expanded upon, below.

Priority outcome	Whitehorse Council comment
<p>Access to distinctive and high-quality environments</p>	<p>Council recommends expanding this outcome to include “Access to distinctive, high-quality, high-amenity and sustainable environments.”</p> <p>High quality and sustainable environments are vital for public spaces and Council supports this focus being applied to the natural environment and environmentally sustainable developments, landscaping, more street trees for greening and cooling, enhancement to existing public places and spaces, heritage protection, cultural heritage and modern and thriving while maintaining some of the characteristics of Box Hill.</p> <p>Council is concerned about the impact of development envisaged by the Structure Plan on the urban heat island effect and finds it difficult to believe that there is modelling that will show a reduction in the urban heat island effect in Box Hill. Council would like the SRLA to provide evidence as to how the Structure Plan will assist with greening Box Hill to reduce, or at a minimum pause, the urban heat island effect.</p> <p>When referencing built form, positive, high amenity needs to be prioritised, e.g., limiting shadowing and wind impacts. Council is looking for spaces that are ‘places for people’ that are:</p> <ul style="list-style-type: none"> • liveable • Inviting, inclusive and accommodative for all ages, genders, and abilities • respectful and safe, and encouraging of arts and cultural values. • fun and entertaining that provide active and passive recreation opportunities
<p>Capacity for future employment and industry</p>	<p>Supported</p>
<p>More diverse, high-value jobs</p>	<p>Suggest rewording priority to “Encourage and invite more diverse and high-value economic activities” (delete the word ‘jobs’).</p>
<p>Increased cycling and walking connections</p>	<p>Combine the two transport priority outcomes into “Increased integrated and connected transport options.”</p> <p>Having a truly integrated and connected transport system will play a significant role in encouraging mode shift away from private vehicles.</p> <p>All modes of transport need to feed into this system including public transport and active transport.</p>

<p>Greater public transport</p>	<p>Upgrades to the Box Hill Transport Interchange needs to occur as a priority. This has been clearly articulated in the Ministerial Advisory Group report regarding the Box Hill Transit Interchange, and the subsequent Box Hill Transit Interchange Steering Committee report. This is a genuine and significant city shaping opportunity. Significant commitment and investment are required to take real action to address the dysfunction spaces and active transport gaps that cause safety, connectivity, accessibility, amenity, and convenience issues.</p> <p>In addition to integration and connectivity, a focus on safety for pedestrians and cyclists is vital (including perceptions of safety).</p> <p>Council’s priority active transport projects are contained in the Box Hill Integrated Transport Strategy and the Whitehorse Cycling Strategy.</p> <p>The north-south walking-cycling connection over the Belgrave/Lilydale train line, connecting Nelson Road to Thurston Street is critical.</p>
	<p>Other priorities:</p> <p>Housing diversity including social and affordable housing, student accommodation and accommodation for key service workers.</p>

5.3 Precinct Themes

The Draft Precinct Vision document states that “*each precinct is different*”, however each precinct has the same generic themes. Council believes that this could mislead the reader into thinking that the themes presented are specific to Box Hill. Specific unique and justifiable themes should be developed for each precinct.

Precinct Theme	Whitehorse City Council comments
Boosting the Economy	<p>Council seeks more information about the assumptions underpinning the growth scenarios that the projected employment figures are based on. Whilst Council acknowledges that there can be variations in forecasts, the projected employment and population figures provided by the SRLA are well in excess of the projections prepared by SGS Economics for the draft BHSP. Council queries:</p> <ul style="list-style-type: none"> • whether the SRL projections are accurate or realistic, and • whether the projections are in fact targets <p>Council suggests including themes and objectives detailed in Council's draft <i>Investment and Economic Development Strategy 2024-2028</i>, (provided to the SRLA) which contains commentary about industry development, liveability, and the visitor economy.</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 modern and innovative economy.</p> <p>Having the hospitals, medical facilities and Box Hill Institute present in close proximity, there are opportunities for collaborative research and innovation in Box Hill. Through the SRL project Box Hill will be further connected to other major universities and hospitals along the SRL East corridor. All these present opportunity for Box Hill to be a hub for innovation, technology, health, and education uses.</p> <p>Opportunities for medical research centres, as well as centres for innovation, research and development should be explored, along with traditional retail businesses and services. Opportunities for government and private offices as well as headquarters of major corporations should also be encouraged in Box Hill as they are the function and responsibilities of Metropolitan Activity Centres. The draft Vision for Box Hill fails to recognise these opportunities. 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.</p>
Enriching Community	<p>Council supports creating healthy and inclusive neighbourhoods; however, it queries how this can be achieved by the precinct planning. One suggestion is “<i>enabling diverse and affordable housing choices and tenure models that support liveability for a growing community.</i>” In the draft BHSP Council intended to incorporate an affordable housing contribution in several of the neighbourhoods within the planning zone. What mechanisms does the SRLA propose?</p>

	<p>Another suggestion is “<i>enhancing recreational assets.</i>” 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 there been made for permanent new open space and recreation facilities that will support the growing population and workforce?</p> <p>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 29m² to 5.9m² per person. This would be a terrible legacy that the SRL project would leave for our existing and 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, creating Box Hill’s own ‘Central Park’ or ‘Fitzroy Gardens’. For these reasons we call on the Victorian Government to ensure that sites and space are set aside now to provide open space for existing and future population and workforce.</p>
<p>Better Connections</p>	<p>Upgrades to the Box Hill Transport Interchange need to occur as a priority and concurrent with the SRL project. The need for upgrades is clearly articulated in the Ministerial Advisory Group report (2017) regarding the Box Hill Transit Interchange, the subsequent Box Hill Transit Interchange Steering Committee report (2019) and Council’s <i>Box Hill Integrated Transport Study</i> (2020). The Box Hill Transit Interchange Steering Committee (appointed by Jacinta Allan as the then Minister for Public Transport), found that the interchange has safety, operational, amenity and functional deficiencies along with inadequate pedestrian connectivity and opportunities to review the road network to support efficient transport movements. The report was released in 2019 and at that time acknowledged that the investment in public transport improvements have not kept pace with the level of growth in Box Hill. If this was true in 2019, it can be assumed that the facility will not cope with the population and workforce increases proposed through the SRL precinct planning process.</p> <p>As continually referenced by Council, it is vital that a direct underground connection be provided between the existing Metro Box Hill train station and the new SRL Box Hill station. It is noted that the Environmental Performance Requirements require this connection to be investigated and an update from the SRLA on the progress of investigations would be appreciated.</p> <p>With the investment of the SRLA in bicycle parking at the SRL Box Hill station, investment is also warranted in other cycling 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</p>

	<p>construction of a link over the Belgrave/ Lilydale train line at Thurston Street/ Nelson Road.</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 are these be factored into the streetscape?</p> <p>Shared pathways pose a high level of risk for people with disability, older people and children who may not be able to react to approaching bike traffic who may be moving at a high speed. Careful design of spaces for pedestrians and cyclists is particularly needed in high movement areas such as the entry and exit from stations and pedestrian pathways across roads.</p> <p>Council emphasises the need to consider the requirements of the Disability Discrimination Act, 1992 (Federal), when designing public spaces and places.</p>
Enhancing Place	<p>Council supports this theme; however, the document does not include any information about built form and design including how individual buildings will interface and activation and treatment of 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 BHSP and UDF.</p> <p>Council welcomes the enhanced corridors in this area; however, it is also important to highlight tree canopy growth and increasing biodiversity. Council has undertaken a significant quantum of work to protect and enhance the important tree coverage across the municipality, including in the Box Hill Metropolitan Activity Centre.</p>
Empowering Sustainability	<p>As mentioned in the Burwood section of this submission, Council supports mechanisms to mitigate climate change, however more information about how the SRLA proposes to achieve this aim is requested.</p> <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.</p> <p>There does not appear to be reference in the ideas to Whitehorse being renowned for its green, leafy, and treed public spaces or environmental improvements. Council has undertaken significant work to protect these characteristics, including through the <i>Whitehorse Municipal Wide Tree Study</i> (translated into Schedule 9 to the Significant Landscape Overlay within the Whitehorse Planning Scheme), and the <i>Whitehorse Urban Forest Strategy for 2021 –2031 (2021)</i>. This thinking needs to apply to Box Hill as well.</p> <p>Council supports mechanisms to encourage mode shift, and therefore queries what facilities will be provided for the community, such as public change facilities and secure bike storage.</p>

5.4 Box Hill Draft Precinct Plan



5 Box Hill Draft Precinct Plan, source: Suburban Rail Loop East, Draft Precinct Vision - Box Hill, 2023

What kind of change could this include?

Future planning for Box Hill will provide homes close to work and the transport, shops, hospitals and schools that people need. These thriving and sustainable communities rely on diverse housing and space for quality jobs to meet their present and future needs.

New housing options will be needed as the preferences of existing and future residents change over time. Diverse housing types include quality social and affordable housing and more compact forms of living close to jobs, amenity and services. **Medium Change** areas provide the opportunity to deliver new infill development that complements the existing centre. These lower rise neighbourhoods could deliver townhouses, developments suitable for families and smaller scale apartments in appropriate locations.

Higher Change areas will also provide space for local services and more housing in mixed-use developments. The overall scale of these areas will be lower than significant change areas, and more residential in locations further from the SRL East station or health and education areas.

Taller mixed-use development is well established in central Box Hill and along key roads like Whitehorse Road, Station Street and Prospect Street. **Significant Change** areas will continue to deliver urban density at this scale, in mixed-use neighbourhoods providing space for jobs growth and local services.



Figure 6: What the change areas could look and feel like in the future.

6 Indicative illustration of change, source: Suburban Rail Loop East, Draft Precinct Vision - Box Hill, 2023

Council is concerned about the substantial extent of the change areas depicted on the draft Box Hill Precinct Plan. The higher and medium change areas extend significantly further south than the current Box Hill Metropolitan Activity Centre boundary and into areas of traditional residential development which comprises largely of single detached dwellings; some of these areas have heritage and neighbourhood character considerations (as recognised by the Heritage and Neighbourhood Character Overlays).

Higher change areas also extend quite broadly to the north along Station Street, and it is unclear what is intended here. In addition, p-21 refers to the higher change areas being “*more residential*” – what does this mean? Is this referring to the degree of mixed use in these locations? The image depicting the change areas does not provide any guidance or expectations. Furthermore, the significant change areas are much more defined (although still not specific) than the higher and medium change areas and leaves the extent of growth and change ambiguous. What are the SRLA’s criteria for defining these areas within each neighbourhood – distance from the station, lot size, logical features, street width, interface considerations, or something else? The rationale is not apparent and requires explanation.

The significant change areas generally align with the BHSP but appears to extend along the south side of Cambridge Street. Council seeks the rationale for this.

The former Box Hill brickworks on Federation Street is designated within the draft Vision document as a key site, however there is no explanation as to what this means, beyond reference to considering it for future housing. Council queries whether housing is the best outcome and whether use of the land is achievable in the 15 year timeframe of the Structure Plan. Further investigations and discussions with Council regarding the designation of this important strategic site is required to fully understand the site’s environmental limitations before considering its use as open space, housing, or anything else.

5.5 Box Hill Preliminary ideas

Council's comments regarding the preliminary ideas presented on pages 23 to 25 are detailed below.

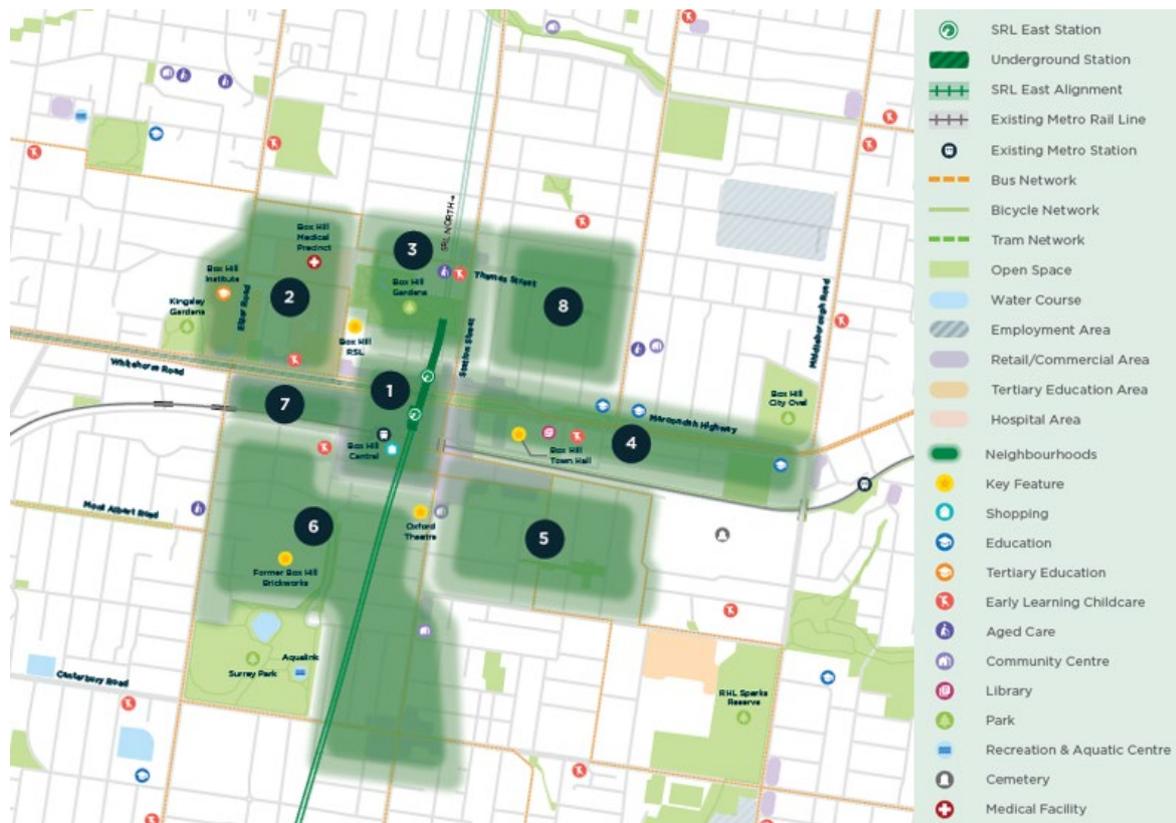
Preliminary ideas	Whitehorse Council comment
<p>1 An enhanced city-scale, urban core</p>	<p>This idea reflects the aspirations of the BHSP and is supported, however it fails to mention built form and design including how individual buildings will interface and activation and treatment of the public realm. There needs to be parameters, or qualifiers, around site characteristics and public realm amenity such as overshadowing and wind effects which is clearly defined in the BHSP and UDF.</p> <p>The idea also does not mention or depict on the map:</p> <ul style="list-style-type: none"> • the connectivity that is crucial between the SRL and existing Box Hill train station, • redevelopment of the bus interchange as an integral project, and • pedestrian and cycling movements beyond Whitehorse Road, such as the Box Hill to Hawthorn strategic cycling corridor and a connection over the Belgrave/ Lilydale train line at Nelson Road/ Thurston Street. <p>The idea needs to refer to delivering design excellence for private and public development for this preeminent centre and also point to more than just <i>“enhance public places”</i>. The public places in Box Hill are limited and come at a premium; they therefore need to be improved to a very high standard fitting of their diverse role and intensity of use.</p> <p>Planning for the core area also needs to address ways of encouraging a range of uses needed to support a Metropolitan Activity Centre – increasing both retail and office space are critical to this vision.</p>
<p>2 Recast Whitehorse Road as a people-focused boulevard</p>	<p>The concept of recasting Whitehorse Road is supported by the BHSP and Box Hill Integrated Transport Study and therefore Council welcomes the SRLA embracing Council's vision for the linear park. However, it did not anticipate the boulevard treatment extending beyond the activity centre boundary and queries the justification for this.</p> <p>The proposed walking and cycling routes along Whitehorse Road must be designed to encourage these modes so that users feel safe, and mode shift occurs, given this is currently a significant barrier for cross corridor traffic.</p> <p>Council also seeks clarification about the reference to <i>“establish landmarks to signal gateways at the transition to central Box Hill”</i>. Council has existing landmarks that are of long-standing community importance, for example, the White Horse statue at the western entry to the Box Hill and the Box Hill Town Hall at the eastern entry. Plans by the SRLA to provide additional or changes to the landmarks in Box Hill would need community and Council input to ensure they are reflective of local cultural and social significance, and to understand exactly what is envisaged.</p>

	<p>The heritage listed buildings at the central core of Box Hill (Station Street and Whitehorse Road intersection) are critical to Box Hill’s identity along with many other heritage buildings within the Structure Plan areas.</p>
<p>3 Reinforce Box Hill’s identity as a state-significant health and education precinct</p>	<p>The current Box Hill Transit City Activity Centre Structure Plan, as well as the draft BHSP, recognise the importance of the health and education precinct. This preliminary idea is therefore supported; however, the importance of the health and education precinct is also not reflected in the Draft Precinct Vision statement.</p> <p>Council queries the “planning settings” to support the health and education sectors. Council acknowledges the existing exemptions from planning scheme requirements that apply to the Minister’s for Health and for Education, so it is unclear what “planning settings” are in mind. From a Metropolitan Activity Centre planning perspective, it would however be appropriate that these State departments take on board the vision that the Structure Plan and draft BHSP seek to achieve and not develop in isolation. There needs to be clear and consistent planning policies and strategic directions to support advancement of the health and education precinct.</p> <p>Council supports the proposed improvements to connections from the health and education precinct into the Box Hill Gardens and along Nelson Road. Council encourages the SRLA to consider significant enhancements to Bruce Street (and potentially Shipley Street as development in this neighbourhood takes shape) as a logical connection to and from central Box Hill to the health and education precinct.</p> <p>The graphic on page 16 mentions the Box Hill Hospital but not the Epworth Eastern Hospital which is also a major facility.</p>
<p>4 Improve the supply of medium-density housing</p>	<p>Council queries what the SRLA means by “<i>medium density housing</i>” and seeks for parameters to be established. A scale instead of images would be more helpful to articulate what is proposed, as the area is blurry on the map and difficult to interpret. In addition, what does “<i>improve the supply</i>” actually mean? Is it a density, housing diversity or delivery facilitation notion?</p> <p>Council supports “<i>new planning settings that encourage high-quality housing</i>” as outcomes under the current controls often fall short of this, particularly from the community’s perspective.</p> <p>Council was advised by the SRLA that Mont Albert was excluded from the declared planning area and structure planning because it contains a considerable number of heritage properties. Therefore, the inclusion of the Combarton Street, William Street, Tyne Street and Alexander Street heritage precincts appears inconsistent with the justification for not including Mont Albert. Council does not believe it is appropriate for heritage precincts to be included in a medium change area. Additionally, the neighbourhood character overlay is applied to an area between Surrey</p>

	<p>Park and Station Street which is also not appropriate for inclusion in the SRL precinct.</p> <p>Furthermore, on the periphery of the declared planning area is the Laburnum Neighbourhood Activity Centre which has significantly different characteristics compared to the Box Hill Metropolitan Activity Centre. Council recommends that the precinct boundary not extend past Middleborough Road.</p> <p>The former Box Hill brickworks on Federation Street is designated within the draft Vision document as a key site, for the consideration of housing. As mentioned in Section 5.4, detailed discussions with Council regarding the designation of this important strategic site is required to fully understand the site's environmental limitations before considering its use as open space, housing, or anything else.</p> <p>Council queries the '<i>new planning settings</i>' which are referenced several times in relation to medium density housing – what does this mean? It is considered inappropriate to release a public document without information that fully explains the intentions in a way that can be understood by the community.</p>
<p>5 Connect places and improve access throughout Box Hill</p>	<p>The Vision and preliminary ideas do not provide information on site characteristics, amenity, public realm and how places would be connected beyond references to pedestrian links. The BHSP and UDF provide ample information about these matters, and how places can be connected and provide a safe, accessible, and pleasant pedestrian experience.</p> <p>For the SRLA to be able to achieve the idea of improving connections and access through Box Hill, it will be essential to address the existing Box Hill Transport Interchange. The draft Precinct Vision is silent on this important issue and Council continues to advocate for urgent attention to be paid to this matter which is failing Box Hill. Further information has been included in the 'Precinct Themes (Better Connections)' section of this submission.</p> <p>Additionally, the <i>Box Hill Integrated Transport Strategy</i> advocates for improvements for connectivity improvements in key locations such as pedestrian signals across Station Street to connect Main Street and Bank Street and the construction of pedestrian and cyclist bridge across the Belgrave/ Lilydale train line at Nelson Road/ Thurston Street. What commitments can the SRLA give to improving the existing interchange and ensuring good connectivity and a safety for pedestrians and cyclists? Any improved connections must also provide for safety/security e.g., traffic calming, lighting, CCTV, pedestrian friendly speed limits, accessibility for all users including people with limited mobility, and buffers between bicycle paths and play spaces.</p> <p>The extension of the 109 tram line along Whitehorse Road should be considered if the change areas extend beyond the Box Hill Metropolitan Activity Centre boundary.</p>

	<p>The “<i>Potential Enhanced Corridors</i>” (which presumably includes increased canopy and other pedestrian improvements) should be expanded to highlight routes such as Station Street north, Whitehorse Road (east to Middleborough Road), Bank Street and Nelson Road/Thurston Street as well as any other streets that enable these corridor improvements.</p> <p>As continually referenced by Council, it is vital that a direct underground connection be provided between the existing Box Hill metro train station and the new Box Hill SRL station. An update from the SRLA on the progress of investigating this is requested.</p> <p>Whilst Council advocates for improved public transport, there is also the need to accommodate and manage vehicle movements. The precinct planning needs to ensure there is adequate pick up and drop off facilities for commuters and visitors, as well as adequate provision for loading and unloading facilities for businesses. There also needs to be appropriate and safe parking facilities. The BHSP provides clear guidance for car parking by providing consolidated parking on the fringes of each precinct. What commitment can be provided by the SRLA to accommodate and manage car parking on the urban fringes of the MAC?</p> <p>Finally, micro mobility (e-scooters, and other future personal mobility devices) needs to be considered and catered for on Station Street, and indeed the broader Metropolitan Activity Centre, given the rise in scooter use in particular. Station Street also needs to change its current role, with the focus transitioning to buses and active transport.</p>
<p>6 Better link local neighbourhoods with services</p>	<p>Council queries the services in this context – it could be more broadly defined to consider community facilities such as the Box Hill Community Arts Centre, leisure facilities and associated public open space.</p> <p>The lack of reference to new open space is a key concern for Council and appears to have been overshadowed in the draft Precinct Vision document through the major focus on housing and employment. The existing open space provision is insufficient in the precinct area and the square metre per person will drop significantly if the SRLA’s population growth projections are realised. There is also no mention of community infrastructure such as, but not limited to, schools, childcare centres, maternal and child health care centres and kindergartens, required to support the projected increase in the residential population and job growth. Whilst Council is not responsible for the provision of primary or secondary educational facilities, Council is critically aware that both primary and secondary schools are at capacity in this area and should be part of the planning process. SLRA must consult with the Department of Education and Training (DoET) to identify school provision needs for the projected growth and identify and allocate land in the Structure Plans as per the requirements of DoET.</p> <p>The graphic on page 16 of the Vision document does not identify any of the prominent dining facilities or the Box Hill Gardens.</p>

5.6 Box Hill Opportunity areas / Neighbourhoods



7 Opportunity areas, source: Suburban Rail Loop East, Draft Precinct Vision - Box Hill, 2023

Council makes the following general comments regarding the map that outlines the Opportunity Areas:

- Reference has already been made that the symbols/ features on this map are difficult to read and we query the locations. Specific to this plan, Council seeks clarification of the “Key feature” symbol and what this means. In addition, should the previously referenced potential “landmarks” be shown?
- The Retail/commercial, Tertiary/education and Hospital areas are not clearly highlighted.
- Text on the map is often concealed affecting readability.

The following comments are offered regarding specific Opportunity Areas.

Opportunity area	Whitehorse City Council comments
1. Central Box Hill	<p>This opportunity area reflects Precinct 1: Central Neighbourhood of the BHSP and is supported, however it fails to mention built form and design including how individual buildings will interface and activation and treatment of the public realm.</p> <p>It is unclear in the context of Box Hill what “<i>greater housing choice</i>” means when there is already, for example, a significant amount of apartment development. Is it referring to building typology or model (e.g., affordable, social, key worker, special needs, and student accommodation)?</p> <p>The idea also does not mention pedestrian and cycling movements beyond Whitehorse Road.</p>
2. Health and Education	<p>This opportunity area reflects Precinct 2: Health and Education Neighbourhood of the BHSP and is supported, particularly the prioritisation of the significant health and education facilities. However, reference to a greater diversity of uses must not dilute the prominence of the health and education uses, instead Council supports complementary health, education and knowledge intensive employment uses. Council queries the broad reference to retail uses for this neighbourhood and whether food and beverage, and retail that supports business should be the outcome. Further, short stay accommodation may have merit to support the health and education uses.</p> <p>Where the SRLA seeks high rise development, the BHSP seeks mid-rise campus scale built form that supports the health and education institutions and that gradually transitions down in scale from Whitehorse Road to the interface with traditional residential development in the north and west.</p>
3. Box Hill Gardens	<p>This opportunity area reflects Precinct 4: Garden Neighbourhood of the BHSP and is supported, particularly the retention of a significant contribution to open space and recreation within the Metropolitan Activity Centre.</p> <p>However, Council reiterates its concerns about the lack of open space in the area and the lack of acknowledgement that there will be impacts on the Box Hill Gardens due to its use as a temporary construction site for a significant portion of the life of the Structure Plan. The opportunity area supports new medium and higher density housing to allow more residents to access the Gardens as open space, therefore increasing the significant shortfall of open space available per person. The Structure Plan therefore cannot rely on Box Hill Gardens to provide the open space needs to the increasing population – it must plan for new open spaces in addition to the temporary spaces planned as offsets for the use of Box Hill Gardens.</p>

	<p>The neighbourhood does not recognise the new ‘promenade’ along the SRL tunnel alignment (between Whitehorse Road and Box Hill Gardens) and the vision for this space and adjoining redevelopment (uses and typology).</p> <p>Council queries whether a greater range of uses on Thames Street (other than health uses) is a suitable outcome.</p>
4. Civic Precinct and Whitehorse Road East	<p>This opportunity area reflects Precinct 5: Civic and Cultural Neighbourhood of the BHSP and is supported, however Council queries the extent of the area, particularly the location of medium scale office development towards Middleborough Road.</p> <p>Council is concerned about Laburnum Station being included in this area (or indeed the precinct planning process) as it offers different characteristics than the Box Hill Metropolitan Activity Centre. The boundary should be Middleborough Road.</p> <p>Enhancements are needed to support Whitehorse Road as “a major pedestrian-focussed boulevard linking compact [sub] neighbourhoods between Box Hill High School and central Box Hill.” The avenue mature trees are a feature of this corridor to enhance however the paths could be improved.</p>
5. Ellingworth Enterprise District	<p>The concept of this opportunity area reflects Precinct 6: Enterprise Neighbourhood of the BHSP and is supported, particularly as a location for small lot employment uses that could accommodate start up, innovative and flexible workspaces.</p> <p>Whilst the document recognises that “<i>sensitive planning to guide a transition in the scale of development to neighbouring residential communities</i>” is required, the extent of the opportunity area is well beyond that envisaged by the BHSP and requires revision.</p> <p>Presumably the reference to this neighbourhood being “<i>well connected to jobs, ...and entertainment options</i>” means connection to these uses located in nearby neighbourhood #1. Perhaps this should be clarified.</p>
6. Surrey Park and Station Street South	<p>The northern part of this opportunity area reflects the southern part of Precinct 1 in the BHSP; however, Council believes that as proposed in the Draft Precinct Vision document it extends too far south and includes areas comprising of low-density, detached, traditional housing.</p> <p>The Draft Precinct Vision document notes that this area will “<i>play a valuable role in supporting a transition between the dense urban centre...and lower scale tree-lined neighbourhoods</i>” however this area currently plays that role and consists of tree-lined leafy streets and traditional residential development. Townhouses and low-rise apartments on consolidated lots (medium change) might be appropriate in some locations, but not as a wholesale change to the expected development within the area.</p>

	Council's recommendation is that this area does not extend past James Street, Box Hill.
7. Prospect Street and Whitehorse Road West	<p>This opportunity area reflects Precinct 3: Prospect Neighbourhood of the BHSP and is supported, particularly the prioritisation of the office and commercial based employment uses. The Draft Precinct Vision document promotes an increased residential population however the BHSP supports residential uses as secondary to the employment focus of the precinct, to ensure the projected population can access jobs within the MAC. Council does not want employment uses diluted by residential or other uses that would detract from focus of the precinct.</p> <p>The Draft Precinct Vision document does not reference the built form character, constrained vehicle access arrangements or the cross-rail corridor link that is proposed by the BHSP and supported by Council. Whilst the Vision document does reference pedestrian access to the north across Whitehorse Road, a link across the rail line to the south is considered a significant missing link in north south pedestrian and cycle routes. Indications are shown on the precinct map on page 20 and the map for Preliminary Idea 6 that could allude to providing a link across the train line, however this is not explicitly mentioned within the Vision document. Referencing the need for the connection within the Opportunity Area 7 or elsewhere within the document would strengthen the SRLA's acknowledgment of the need for improved access in this location.</p> <p>There are also more opportunities to provide pedestrian crossing facilities across Whitehorse Road to improve connectivity in the precinct and the precinct more broadly.</p>
8. Residential East	<p>There is not a comparative neighbourhood in the BHSP as this area is outside the boundary of the Box Hill Metropolitan Activity Centre. Whilst the Vision document acknowledges the leafy green character and low-density development, Council queries the use of the term "<i>moderate degree of growth</i>" and "<i>medium-scale dwellings by consolidating lots</i>".</p> <p>Parts of this precinct are included in the Residential Growth Zone which allows for medium density development; therefore, Council seeks clarification as to the extent of growth the SRLA proposes for this area.</p>

6. CONSULTATION

6.1 Community engagement activities

The Draft Precinct Vision documents state that 615 surveys were received across the entire SRL East project which seems low for a project of this scale and significance. As previously stated, Council is interested in the outcomes of the community engagement conducted by the SRLA during the exhibition of the Discussion Paper. In Council's submission about the Discussion Paper, Council stated that it would be very much appreciated if a report detailing the outcomes could be provided to Council ahead of, or with, the release of the Draft Precinct Vision statements, as this would help

Council to understand the awareness of the project and the community views as the development of the Structure Plans evolve.

No report was made available prior to the release of the Draft Precinct Vision documents; therefore, Council again requests this information be made available. There could be the perception that the Draft Precinct Visions were predetermined and that the outcomes of the Discussion Paper engagement might have not been genuinely considered or fed into the Draft Precinct Vision documents prior to their release. It also does not reflect proper engagement protocol to "close the loop" on feedback and ignores the requirements outlined in *Planning Practice Note No. 58 - Structure planning for activity centres*, which among other things requires *Stakeholders and community: adding value to the [structure] plan* and emphasises the importance of community and respective Council involvement and engagement.

Council is therefore seeking information from the SRLA about:

- How Council's submission and other community feedback on the Discussion Paper was considered prior to the release of the Draft Precinct Vision documents,
- 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 Structure Plan process rather than inform Council after developing documents at different stages.

Council is concerned that a portion of the public exhibition timeframe for the Precinct Vision documents was over the Christmas and New Year period. While the extension of the engagement period is appreciated, it is considered an inappropriate time to commence any community consultation.

Ward Councillors and the Mayor expressed concern that SRLA's initial plans for engagement with the Whitehorse community would not raise the level of awareness needed for residents and visitors to comprehend the level of change proposed by the precinct planning process. A campaign that the Councillors considered represented a more fulsome and timely campaign of informing the impacted communities was therefore implemented by Council. The aim of Council's engagement activities was to alert the communities within the Box Hill and Burwood precincts about the draft Vision documents and encourage direct participation in the SRLA's engagement activities.

Council conducted the following community engagement activities:

- Brochure mail out to approximately 11,000 properties in the Burwood precinct and approximately 25,000 properties in the Box Hill precinct. Scanning of the QR codes by recipients of the brochures has generated approximately 1,600 website views to the SRLA pages (as of 20 February 2024).
- Targeted Facebook and Instagram ads have reached 10,922 people with 647 clicks through to the SRLA's website (as of 20 February 2024).
- Articles published in Council's 'Whitehorse News' (February edition).
- Article in Council's 'Down to Business' e-newsletter (1,500 recipients from local businesses).
- Emails to resident and community special interest groups.
- Information placed on Council's website with links to the SRLA's website.
- Councillors hosted four pop up events to provide information to community members and encourage them to complete the SRLA survey. It is estimated that Councillors and officers spoke with approximately 400 people across these sessions. Some of the common themes that emerged from the discussions with community members included:

- Many attendees received Council's brochure in the mail and mentioned it was the first time they were aware of the SRL draft Precinct Visions.
- Many comments focussed on the need for additional community infrastructure such as open spaces and schools, and revamped public spaces such as Box Hill Mall.
- There was recognition by some attendees that Box Hill may be appropriate for higher density developments, however many attendees at the Burwood sessions shared concern about the proposed locations, heights and densities shown in the draft Precinct Plans.
- The environmental impacts of additional population were a common concern in Burwood, particularly the impacts to Gardiners Creek Reserve, its flora and fauna and the Creek itself.
- There were broad concerns about the lack of detail contained in the current documents, with many residents uncertain if new planning controls would apply to them.
- Many residents raised that they were concerned that Council were losing decision making power through this process and think that precinct planning is a foregone conclusion.
- There were concerns about the significant impact of increased densities on the infrastructure of local areas (water, sewerage, electricity, schools, roads, bus services etc).
- In Box Hill concerns were raised about the breadth of uses being promoted in the activity centre, and that any future planning needs to ensure it is a truly mixed-use activity centre.
- Concerns were raised about the amenity of residents if significant future development goes ahead – specifically relating to overshadowing, overlooking, parking in local roads etc.
- Many general questions were asked about the SRL project, e.g., the location of the stations and tunnels, the timelines of works and queries about the current Early Works.

It is noted that since Council developed its community engagement plan, a more fulsome program of community engagement activities was planned by the SRLA. This is appreciated, though many residents indicated that they were unaware of these sessions. It is highly recommended that improved communication of consultation events occurs in future.

7. PROCESS, ROLES, AND TIMELINES

As raised in Council's submission to the Discussion Paper, 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.

Council has repeatedly requested information about Council's role in the preparation of the Structure Plans, however none has been forthcoming. Council in consultation with the community, has undertaken significant and extensive work in developing the Vision for Box Hill and the 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.

To date, Council has provided information to the SRLA regarding various existing and proposed strategies as well as data on a range of subject matters. Until the Precinct Discussion Paper and the

draft Precinct Visions were released, Council had no insight into how the data and information had been interpreted or used. Council is seeking a role that is more than just being informed by the SRLA when documents are released and wish to be part of developing those documents.

Council wishes to remind the SRLA of the consultation requirements outlined within Planning Practice Note No. 58 - *Structure Planning for Activity Centres* specifically with respect to Council and local communities. The Practice Note, among other things, includes the following requirements that the SRLA, having the authority to prepare the Structure Plans (and be the Planning Authority for future Amendments), must consider and adhere to:

1. Effective engagement with stakeholders and the community is essential to implement the Structure Plans. Various levels of engagement should be considered at various stages of preparing the Structure.
2. Engagement with the wider community and targeted consultations including community reference group or steering committee is vital
3. Understanding stakeholders' interest in the centres, their ability to influence and deliver outcomes is critical to inform the Structure Plans

Key stages of community engagement include developing a vision for the centre, scoping community, and stakeholder issues, developing the plan, seeking feedback on the draft plan, and outlining how the community and stakeholders can continue to be engaged during the implementation phase.

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 radically 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.

The SRLA could have benefitted from a more collaborative process where Council could provide its local knowledge about Burwood and Box Hill. Council again reinforces our desire to participate more wholesomely and collaboratively in the process to provide intimate local knowledge about Burwood and Box Hill.

8. CONCLUSION

As discussed throughout this submission, Council is eager 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.

Council requests the following:

1. that no decision on the Vision Statements for the Box Hill and Burwood Structure Plans be made until the outstanding issues raised in Council's submission are resolved to the satisfaction of Council.
2. a meeting between the Minister for Planning, the Mayor, and Council's CEO be held to discuss Council's concerns with the Draft Vision Statements, community consultation,

collaboration with Council, and an appropriate approach towards resolving the outstanding issues prior to proceeding with the remainder of the project, and

3. to work with the SRLA in resolving the outstanding issues raised in Council's submissions prior to drafting of the Structure Plans and any Planning Scheme amendment documents.

Council reserves its right to make further submissions in relation to the Draft Vision Statements for the Structure Plan areas at any future advisory committee (or similar) to be appointed to consider this project and or the subsequent amendments to Whitehorse Planning Scheme to implement the Structure Plans.

9. CONTACT DETAILS FOR FURTHER INFORMATION

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