



Submission to the Suburban Rail Loop Authority on:

**Amendment GC248:
Burwood SRLA Structure Planning area**

**Amendment C255WHSE:
Box Hill SRLA Structure Planning area**

Prepared by Whitehorse City Council

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Contents

1. INTRODUCTION.....	13
1.1 What this submission considers	13
2. KEY PLANNING ISSUES.....	14
2.1 Planning for growth in the new neighbourhoods.....	15
2.2 Securing Housing Choice	24
2.3 Urban Design considerations - general	27
2.4 Urban Design considerations – specific	30
2.5 A high quality public domain: Open space, tree canopy and biodiversity	34
2.6 Community facilities	39
2.7 Connectivity and accessibility	41
2.8 Parking	46
3. KEY ISSUES WITH PROPOSED IMPLEMENTATION	48
3.1 Box Hill and Burwood draft Implementation plans	48
3.2 The Voluntary Public Benefit Uplift Framework (VPBUF)	49
4. CONCLUSION	51

Abbreviations & Terminology

Abbreviation/ Term	Definition
BFO	Built Form Overlay
DEECA	Victorian Department of Energy, Environment and Climate Action
CPTED	Crime Prevention through Environmental Design
C1Z	Commercial 1 Zone
C2Z	Commercial 2 Zone
C3Z	Commercial 3 Zone
DDA1992	Disability Discrimination Act 1992
DCP	Developer Contribution Plan
FAR	Floor Area Ratio
FAU	Floor Area Uplift
IN3	Industrial 3 Zone
MPS	Municipal Planning Strategy
MUZ	Mixed Use Zone
RGZ	Residential Growth Zone
PAD	Suburban Rail Loop Authority Planning Area Declaration
Place Types	Categories of urban form identified in the Built Form Overlay. They are (i) Central Core and/or Central Flanks (ii) Main Streets (iii) Key movement Corridors and Urban Neighbourhoods (iv) Residential neighbourhoods (v) Employment Growth and Employment neighbourhoods
PO	Parking Overlay
PEA1987	Planning and Environment Act 1987
PRZ	Precinct Zone
PSA	Planning Scheme Amendment (to the Whitehorse Planning Scheme)
PPF	Planning Policy Framework
SP	Structure Plan
SLO9	Significant Landscape Overlay 9
SRLA	Suburban Rail Loop Authority
SRL	Suburban Rail Loop project

VPBUF	Voluntary Public Benefit Uplift Framework
WCC	Whitehorse City Council
WDCP	Whitehorse Development Contributions Plan

Executive Summary

This submission is responding to the Structure Plans for Box Hill and Burwood and associated draft amendments to the Whitehorse Planning Scheme (WPS) prepared by the Suburban Rail Loop Authority (SRLA) in relation to the SRL East project.

Council generally supports a precinct planning approach as a way of comprehensively planning for future growth and improvement around the new Box Hill and Burwood SRL stations. For the Burwood and Box Hill communities the amendment and structure plans propose a substantial increase in residential / employment land densities and heights of up to 40 storeys in some parts of Box Hill and up to 20 storeys in some parts of Burwood. Council acknowledges that the Structure Plans and planning scheme amendments seek to facilitate a dramatic change in urban form that is intended to maximise the public transport benefits of the new SRL stations and to encourage mode shift from the private car to more sustainable active and public transport options.

Nevertheless, Council has identified a number of issues and improvements required to the Structure Plans and planning scheme amendments which it considers need to be addressed to ensure the SRL East project and associated precinct planning proceed in a way that realises the benefits of the project to the community and delivers an acceptable planning outcome.

Firstly, Council considers the most critical issue that will determine the success of the precinct planning is the delivery of the necessary infrastructure – including community infrastructure, open space, environmental initiatives, active and public transport improvements to create liveable, walkable and comfortable neighbourhoods within the SRL precincts. In particular, Council notes that transport projects, including a new bus interchange at Box Hill and improvements to the public transport network such as the Tram Route 70 extension to Burwood, and active transport initiatives, are essential to enable mode shift to occur.

While no funding strategy has been provided in relation to the infrastructure, Council notes that it is identified as the lead agency for the delivery of key infrastructure in the draft Implementation Plans for each of the Box Hill and Burwood precincts.

While Council will play its part in providing for service delivery to the new resident and worker populations

To enable mode shift from car usage to public and active transport a suite of projects is recommended through the various planning documents for Council to lead and fund. These projects include:

- an upgraded and extended public realm which encompasses local street and walking and wheeling infrastructure connecting residents, visitors and key workers to public transport ; and
- upgraded and new open spaces and community facilities to meet the current deficit and forecast gaps in service provision.

A key risk to delivering the SRL visions for Box Hill and Burwood is that Council will not be able to commit to fund or deliver projects of this scale or complexity. As it currently stands these projects are not included in Council's forthcoming Council Plan 2025-2029, its 10-year capital works plan or its Development Contributions Plan.

Council believes that the SRLA and State government needs to commit substantial funds to acquiring, rezoning and delivering ground level green open space to meet existing and future open space requirements and also provide financial and administrative support for an upgraded public realm for improved walking and wheeling connections that are accessible to all, both day and night.

The SRLA should also consider, as a matter of urgency, acquiring additional sites in Box Hill, including the former Box Hill brickworks, and additional sites in the Burwood area including land adjacent to the Lundgren chain to meet the current open space deficit.

Securing land for open space, regional sporting facilities and key walking and wheeling linkages will also provide physical space for large trees and understorey which are key priorities in the structure plans in terms of urban cooling and biodiversity.

Another key issue in structure plan implementation is that relying on the private sector to deliver affordable housing via section.173 agreements (*Planning and Environment Act 1987*) is unreliable. Furthermore, the Voluntary Public Benefit Uplift Framework (VPBUF) enabled via the new PRZ and the new BFO schedules does not mandate a supply of one type of public benefit over another.

Lastly, Council believes that the new planning controls, whilst intended to streamline planning processes for the private sector, are overly complex leading to uncertain outcomes in public benefits.

Recommendations

General

1. Cross reference the 'neighbourhoods' in the structure plans to the planning controls and include references to the place types from the BFO schedule in the structure plans.
2. Undertake further testing on the FARs.
3. Retain certain third-party rights to allow Council to fairly consider the views of the community in circumstances where design outcomes and built form standards have not been met.
4. Protect established trees and gardens and enhance tree canopy by retaining Significant Landscape Overlay, schedule 9 (SLO9) throughout the precincts.
5. In areas affected by the proposed BFO Schedule 8, protect the existing landscape character allowing development on one boundary only.
6. In areas earmarked for high housing growth, protect and promote employment floorspace.

Mixed Use Zone

7. Reduce the extent of the proposed Mixed Use zoned land which may lead to commercial development being scattered over an area rather than clustered.
8. Convert the proposed Mixed Use Zone to the Residential Growth Zone in the following locations:
 - (i) along Burwood Highway, Elgar Road, Highbury Road and Station Street;
 - (ii) the retirement village behind and adjacent to 301 Burwood Highway; to encourage higher density residential development.
9. Council supports
 - (i) land immediately adjacent to the east and south of station precinct having the Mixed Use Zone as the applied zone, as it provides a concentrated area for commercial and residential activity.
 - (ii) the office development site at 301 Burwood Highway having the Mixed Use Zone as the applied zone, but do not support the existing residential land behind having the Mixed Use Zone as the applied zone.
 - (iii) land at Mitford Avenue, Delany Avenue and Centre Court having the Mixed Use Zone as the applied zone, as it provides a concentrated area for commercial and residential activity.
10. Convert the proposed Mixed Use Zone to the Residential Growth Zone along Station Street to the north and south of the commercial core of Box Hill, and along Canterbury Road to encourage for higher density residential development.

SRLA led land acquisition including rezonings to PPRZ

11. The SRLA should undertake additional land acquisition due to the overreliance on private sector led land consolidation.
12. Existing local streets and footpaths may need to be widened to service higher densities and to provide physical space for large trees.
13. Land required for public open space should be acquired as a matter of urgency and rezoned for PPRZ. This includes key sites such as part of 127 Highbury Road (which interfaces the Gardiners Creek corridor) and the former Box Hill Brickworks at 14 Federation Street, Box Hill.
14. Walking, wheeling and biodiversity linkages should generally be rezoned in the first instance to PPRZ with the balance of the land (as relevant) rezoned to PRZ.

Built form - Burwood

15. Review the recommendations for built form in Burwood which are too dense given its contextual location, (current and proposed).
16. Introduce mandatory requirement to protect the banks, waterway and associated public open space in the creek reserve.

Urban design – Box Hill

17. Ensure there is adequate solar access to footpaths, particularly given the priority for 'green streets'.
18. Promotion of Whitehorse Road (between Station Street and Middleborough Road) as a tree lined boulevard.

For the Central Box Hill neighbourhood:

19. Review and refine the future role and objective within the draft Structure Plan.
20. The historic St Andrews and Hanbit Uniting Church sites should be identified as Civic, Community and Cultural not as significant commercial sites earmarked for significant Commercial Scale or significant Housing as variously mapped in the current plans.
21. Harrow St and Watts Street carparks should be remapped within Neighbourhood A: Central along with their related access arrangements.

For the Health and education neighbourhood:

22. Review the vision in the structure plan for this neighbourhood. This area should have a higher allocation of space for employment in the health and education sectors. Council recommends that the preamble for the Vision for the Precinct B Health and Education Neighbourhood should be amended to read as follows:

“A high-amenity regionally significant Health and Education precinct that prioritises health and institutional uses over residential uses with new buildings, lively streets, improved walking and cycling links and enhanced public realm”.

For the Laburnum neighbourhood:

23. Update the alignment between the neighbourhoods identified in the Structure Plans and the approach advanced by the Precinct Zone and the Built Form Overlay’s various schedules.

Open space

24. Further work is required to ensure that the quality of open space has been appropriately assessed, including having regard to adequacy of winter sunlight access, whether it is unencumbered and functional at all times, adequacy of public road access to maximise passive surveillance opportunities, retention of mature trees and ability to incorporate sustainable water supply.
25. Review the assumed 9 sqm open space per person is inadequate and significantly lower than what is considered currently acceptable.
26. Review the Conceptual Precinct Plans in each of the Structure Plans to show new open space.

For Box Hill open space:

27. Council considers that the total area of the two open space offset sites, being less than one hectare is unsatisfactory, particularly noting the length of time the construction is to occur.
28. The former Box Hill Brickworks at 14 Federation Street should be acquired by the SRLA to be used as permanent regional open space.

For Burwood open space:

29. The open space proposed to be provided in the Burwood Structure Plan area is insufficient to accommodate the substantial increase to the population and that the following locations should be priorities for the SRLA to acquire as part of the project:
 - North of Burwood Highway between Warragul Road and Parer Street.
 - North of Burwood Highway, east of Station Street.
 - South of Burwood Highway, east of Station Street;
 - South of Highbury Road, west of Gardiners Creek.

Canopy targets

30. The PRZ and BFO schedules need to be redrafted to reflect the intention of achieving increased canopy tree coverage.

Community facilities, location and delivery

31. In Box Hill, Council considers that sites purchased by the SLRA should be prioritised for the provision of community facilities and infrastructure.
32. In Burwood, Council supports the provision of a community hub in the Sinnott Street area and considers that the SRLA should ensure that sufficient space is provided to enable the hub to include a new library and maternal child and health care facility.
33. Council cannot commit to funding the community facilities listed in the Implementation Plans. The SRL needs to work with Council to further develop these plans.

Connectivity and Accessibility

34. That the SRLA and State government address the road space and land requirements that may be needed to achieve linkages, so that they are safe, accessible and legible.
35. That the State government commit to expanding Tram route 70 to Burwood Highway.
36. Commitment from the State government on improvements to other modes of public transport. In particular, bus service improvements in line with 'Victoria's Bus Plan 2021', that would see fast, direct and frequent bus services along the arterial road network so that buses are a time competitive option compared to private vehicles.

Connectivity and accessibility in Box Hill:

37. A new location for the Box Hill bus interchange must be included in the Structure Plans as a new facility that is properly integrated into the transport network.
38. The bus network needs to be reviewed to ensure better connectivity across the precinct and its neighbourhoods.
39. A stronger commitment is needed from the DTP in delivering key new and upgraded pedestrian walking and cycling links such as
 - (i) A pedestrian bridge over the Lilydale line between Nelson Road and Thurston Street and
 - (ii) Grade separated crossings at major roads such as Elgar Road, Station Street and Whitehorse Road. Prioritisation should be given to an improved connection over Elgar Road to support the Ringwood to Hawthorn trail along the rail corridor.

Connectivity and accessibility in Burwood:

Council request that SRLA commit to:

40. Widening the Gardiners Creek corridor north of Highbury Road to ensure better walking and cycling connections, and improved amenity for park users.
41. Acquiring key links in the Lundgren Chain for improved walking and wheeling connections.
42. Upgrading and widening sections of footpath within the Structure Plan area including along major routes such as Highbury Road.
43. Prioritising the delivery of safe at-grade pedestrian connections across major traffic routes in Burwood in conjunction with grade separated crossing points.
44. Reviewing cycling and pedestrian connections throughout the Burwood Structure Plan and beyond, including consideration of a continuous Gardiners Creek regional trail across Station Street.

Parking

45. Further clarity is needed on the following matters:
 - Parking users' rates where height limits are exceeded and the VPBUF is applied: will additional car parking be required? The proposal relies on the private sector to set parking rates.
 - In delivering 'green streets', which is supported, increased canopy cover will mean a reduction in the supply of on-street car parking. How will this be balanced?
 - Some land uses are missed in the Area B provisions.
 - the Health and Education Precinct to respond to the parking needs of hospital patients and those supporting them, shift workers and apprentices.

Implementation

46. SRLA to provide support for the key projects listed in the draft Implementation Plans through:
 - direct capital funding mechanisms; and
 - compulsory acquisition of private land and rezoning to ensure ground level open space, linkages and in some cases, facilities.
47. Council has concerns about the failure to require the provision of affordable housing through the Amendments, in light of the serious projected need identified in the SRLA's own background assessments. Council therefore requests that:
 - (i) the Amendment should require the provision of affordable housing in stronger terms.
 - (ii) The State should take a more active role in the provision of affordable within the Precincts by making affordable housing a central objective of the housing objectives backed up by clear planning controls.

48. The Implementation Plans must be reviewed for completeness to ensure all necessary actions are included.
49. State government funding will be required to deliver the public realm that is required to support the intensive growth of the Precincts.
50. The costs of reviewing proposals under the VPBUF should be at no cost to Council.
51. There should be only one responsible authority for the Precincts. The availability of adhoc ministerial pathways via development facilitation will make managing the delivery of the Precincts more difficult by breaking up the consistency of decision making.

1. INTRODUCTION

This submission responds to the proposed amendments to the Whitehorse Planning Scheme (WPS) led by the Suburban Rail Loop Authority (SRLA) as the planning authority. The amendments seek to translate the draft Structure Plans (SP) into the WPS.

The proposed planning scheme amendments are:

- Amendment GC248: Burwood SRLA Structure Planning area; and
- Amendment C255WHSE: Box Hill SRLA Structure Planning area

The amendments also propose that the following are included as Background Documents to Schedule to Clause 72.08 in the WPS:

- Draft Burwood Precinct Structure Plan, implementation plan and parking precinct plan; and
- Draft Box Hill Precinct Structure Plan, implementation plan and parking precinct plan.

These have been exhibited for comments between the 17 March and the 22 April 2025.

1.1 What this submission considers

This submission contains an initial response to the proposal and considers:

- whether the suite of new planning provisions underpinned by the Structure Plans will effectively deliver transformational transit orientated sustainable neighbourhoods that provide affordable living, local employment and community and open space infrastructure;
- whether the proposals set in place the policy settings and mechanisms to deliver a liveable environment that also encourages mode shift from the private car to public and active transport;
- the role and capacity of Whitehorse City Council (Council) to implement the projects identified in the implementation plans for Box Hill and Burwood; and
- whether the draft Structure Plans are appropriate for the long-term land-use, built-form, social, economic and environmental outcomes of the municipality.

Next steps

Whitehorse City Council intends to appear before a forthcoming Advisory Committee in late 2025 with the intention of further elaborating on matters contained in this submission and any other matters as relevant.

2. KEY PLANNING ISSUES

Council has reviewed the SRLA proposal (the amendments, Structure Plans with their implementation plans and parking precinct plans and technical documents) with consideration of the following matters:

- whether the suite of new planning provisions underpinned by the Structure Plans will effectively deliver transformational transit orientated sustainable neighbourhoods that provide affordable living, local employment and community and open space infrastructure;
- whether the proposals set in place the policy settings and mechanisms to deliver a liveable environment that also encourages mode shift from the private car to public and active transport;
- the role and capacity of Council to implement the projects identified in the implementation plans for Box Hill and Burwood; and
- whether the draft Structure Plans are appropriate for the long-term land-use, built-form, social, economic and environmental outcomes of the municipality.

Given the above, Council has assessed the proposal against the following planning considerations:

- 2.1 Planning for growth in the new neighbourhoods
- 2.2 Securing housing choice
- 2.3 Urban Design Considerations: General
- 2.4 Urban Design Considerations: Precinct-Specific
- 2.5 A high quality public domain: Open space, tree canopy and biodiversity
- 2.6 Community facilities
- 2.7 Connectivity and accessibility
- 2.8 Parking

Section 3 considers the draft implementation plans and the Voluntary Public Benefit Uplift Framework (VPBUF).

2.1 Planning for growth in the new neighbourhoods

- **Common issues to Box Hill and Burwood**

Council acknowledges that the significant change in urban form is intended to maximise the public transport benefits of the new SRL stations and to encourage mode shift from the private car to more sustainable active and public transport options. Council is broadly supportive of the principles for structure planning these areas and the desired outcomes but is concerned about the disconnect between the draft Structure Plans and the provisions of the Built Form Overlay (BFO) coupled with the proposed dramatic change in building heights.

- **Disconnect between ‘Neighbourhoods vs. Place Types’**

Each Structure Plan contains a detailed section on different ‘neighbourhoods’ within each Structure Plan area. This includes statements relating to the future role of each neighbourhood along with associated objectives.

These neighbourhood descriptions contain some of the best insights into how different neighbourhoods within each station precinct are intended to evolve, balancing land use, built form and public realm matters.

However, there is no reference to neighbourhood boundaries or neighbourhood descriptions or objectives provided in the Amendments. The content and the nuance contained in these neighbourhood descriptions are all but lost in their lack of translation into the Amendment documentation. This is considered to be a clear deficiency and disconnect between Structure Plan content and proposed planning scheme controls.

This disconnect and confusion between the Structure Plan content and its translation into the Amendments is further emphasised by the fact the BFO Schedules are based on several standardised ‘place types’:

- Central Core
- Central Flanks
- Main Streets
- Key Movement Corridors and Urban Neighbourhoods
- Residential Neighbourhoods
- Employment Growth and Employment Neighbourhoods

These ‘place types’ are not referred to in the Structure Plans, which focus instead on ‘neighbourhoods’. The ‘place types’ are derived from the urban design background reports, which are not listed as background documents in the Amendments.

Additionally, they seem to have been prepared for the basis of preparing built form

controls for areas within each station precinct. The boundaries of the 'place types' and hence BFO Schedules, and the 'neighbourhoods' contained in the Structure Plans are different.

The 'place type' categorisation seems relevant in isolation, and logical in terms of the background urban design report. However, this categorisation has not been carried into the Structure Plan, and no attempt seems to have been made to reconcile the use of two different form of classifying sub-precincts ('place types' vs 'neighbourhoods') within each station precinct, within the Structure Plan and the Amendment documentation.

- **Floor Area Ratios**

For the Burwood and Box Hill communities the Amendments and Structure Plans propose a substantial increase in residential / employment land densities and discretionary (ie exceedable) heights of up to 40 storeys in some parts of Box Hill and discretionary (ie exceedable) heights up to 20 storeys in some parts of Burwood. The increased densities aim to provide for greater housing diversity and more local business and employment options that will utilise the new SRL system and value the lifestyle qualities Box Hill and Burwood currently offer.

The proposed mandatory FAR enabled through the PRZ also provides the opportunity for FARs to be exceeded where an eligible public benefit can be provided. However, for Residential and Employment neighbourhoods (under the BFO) 'deemed to comply' provision will apply instead.

Council acknowledges the inclusion of FARs in the schedules to the Precinct Zone as mandatory requirements. The provision of FARs as a built form tool to achieve enhanced built form outcomes may have merit subject to further testing.

However, the effectiveness of the tool relies on the relationship between the actual FAR specified and other aspects of the built form controls. Council is concerned that there is no sufficient testing on whether the FARs are correctly struck and that there is no continuity in the consideration of FARs from the background reports into the PSA:

- Floor area ratios were identified and considered in detail in the background urban design reports (which are not proposed to be listed as background documents).
- Floor area ratios are not mentioned at all in the Structure Plans (which are proposed to be listed as background documents).
- Floor area ratios are a key part of the built form controls in the Amendment documentation.

- **Removal of third-party rights**

Both the Precinct Zone and Built Form Overlay have adopted a default exemption from notice, decision and review provisions of planning permit applications by third parties. Council acknowledges that removing third parties is a way of streamlining the assessment process .

However, in Council's view consideration must be given to introducing either full third-party rights, or limited rights relating to a requirement for notice for applications that do not comply with the design outcomes and the built form standards identified by schedules to the Built Form Overlay. Limited notification rights would enable objections to be lodged. This would enable Council to consider the planning merits of any objections lodged as part of its assessment of a permit application. However, this need not necessitate the issue of a Notice of Decision and would not allow for objector-initiated appeals. The point is that there is a way of retaining certain rights without affecting the process.

This approach would provide an incentive for applications to comply with discretionary standards, and allow Council as Responsible Authority to fairly consider the views of the community in circumstances where design outcomes and built form standards have not been met.

- **Garden character, canopy trees and zoning of open spaces**

The mature gardens and large trees that characterise the residential streets of Box Hill and Burwood define these neighbourhoods. These local attributes and garden qualities underpin liveability and need to be safeguarded in the long term as residential and employment uses intensify.

A key risk to the Box Hill and Burwood communities is the loss of established gardens, large trees and suburban character due to:

- the removal of the SLO9 which seeks to protect tall trees and canopy cover in both Box Hill and Burwood;
- the removal of the Neighbourhood Character Overlay 2 in Box Hill; and
- through the new BFO, the introduction of zero lot lines, particularly in central Box Hill (categorised as Central Core, Main Streets and Central Flanks) where there are no deep soil or canopy tree requirements.

To provide a further example, in areas affected by the proposed Schedule 8 to the BFO:

- A key outcome sought in these areas is to support medium housing growth in the form of mid-rise development in a garden landscape character;
- Typical original lot widths in these areas range from 15 to 20 metres; and

- On lots of less than 24 metres (i.e. a single unconsolidated former detached house lot) a maximum height of 11 to 14 metres may be permitted (i.e. three to four storeys), which Council considers to be reasonable.

However, under the proposed controls a two-storey building wall can be built to both side boundaries for the front ½ of the site in some areas. It is considered that this could result in boundary-to-boundary development in some streets, which would be highly inconsistent with a landscape garden character. It is also the case that such an outcome for a single unconsolidated lot would go against the objective of achieving lot consolidation to facilitate more intense redevelopment in these areas. A preferable alternative may be to allow development on a boundary to only *one* side boundary.

- **Employment floor space**

Council submits that with the heavy focus of housing that comes through the Structure Plans there is a risk that the employment focus of the Precincts will be diminished. In some instances, the plans within the Structure Plans indicate “High housing growth” and “commercial” on the same sites/areas. Contrast for example the precincts of Prospect and Rutland Road which have long been the focus of enterprise in Box Hill, and the former tax office, and even church sites within the precinct. Each of these historic and employment areas are earmarked for High Housing growth.

Council also notes that within the areas of the Town Centre, the proposed scale of development earmarked for various areas typically exceeds the commercial scales that have predominated, and which have been successful in realising more enterprise. Council would not want to see, as a result of this approach, that there is a shift of these areas to residential where the greater building heights sought in the Structure Plan can be economically realised in place of commercial uses.

These elements require further consideration.

- **Extent of Mixed Use Zone Land**

The relevant schedules to the Precinct Zone outline areas to be subject to applied zones. With reference to the extent of Area 2, the relevant applied zone within the schedule table is nominated to be the Mixed Use Zone (MUZ). In noting that the MUZ is within the suite of the residential zones, as per its purpose, it also seeks to provide for a range of residential, commercial, industrial and other uses which complement the mixed-use function of the locality.

Council does not disagree with the potential use of the MUZ, but is concerned about the *extent* of land to be subject to the applied MUZ. In Council’s view the extensive application of the MUZ may scatter commercial development over a much wider

area, rather than focussing this development in targeted and concentrated locations. Council has formed a view that much of the land indicated for the MUZ would be better allocated to the Residential Growth Zone. Council includes a brief summary of the areas which are supported for Mixed Use Zone compared to those not supported below:

Burwood

- Council does not support the extent of Mixed Use Zone proposed along Burwood Highway, Elgar Road, Highbury Road and Station Street. We believe this land should be encouraged for higher density residential development through the Residential Growth Zone.
- Council supports land immediately adjacent to the east and south of station precinct having the Mixed Use Zone as the applied zone, as it provides a concentrated area for commercial and residential activity.
- Council supports the office development site at 301 Burwood Highway having the Mixed Use Zone as the applied zone, but do not support the existing residential land behind having the Mixed Use Zone as the applied zone. We believe the existing residential land should be encouraged for higher density residential development through the Residential Growth Zone.
- Council supports land at Mitford Avenue, Delany Avenue and Centre Court having the Mixed Use Zone as the applied zone, as it provides a concentrated area for commercial and residential activity.

Box Hill

- Council does not support the extent of Mixed Use Zone proposed along Station Street to the north and south of the commercial core of Box Hill, or along Canterbury Road. We believe this land should be encouraged for higher density residential development through the Residential Growth Zone.

- **Additional comments**

The Amendment proposes to achieve an intensified mix of residential and employment land uses in order to maximise the access to the new train stations. Council is supportive of the broad aims of the Amendments and the critical benefits which will be seen for future generations. There are, nonetheless, some risks in the Amendments as it is proposed which should be further addressed:

- An overly complex suite of planning provisions that relies on applying multiple controls to guide height and development outcomes and to identify applied zoning of an area.
- Overreliance on land consolidation. Land parcels are small and will take some time to consolidate for larger developments.

- The 100% site coverage recommendations do not allow for any expansion of the public domain. Existing local streets and footpaths may need to be widened to service higher densities. This also means that achieving any additional tree canopy cover may not be possible if local streets (the public domain) are relied on for new tree growth.

Although master planning is proposed for key sites, any land required for public open space should be acquired as a matter of urgency and rezoned for PPRZ, with the balance of the land rezoned to PRZ. This will ensure that:

- Land which is initially rezoned to PRZ and then subsequently required for some public use is not burdened with the Windfall Gains Tax.
- Land is not rezoned twice;
- Open space from key sites, such as 127 Highbury Road (which interfaces the Gardiners Creek corridor) and the former Box Hill Brickworks (bordering Surrey Park) can be carefully planned for early in the development process, providing certainty for the community and again avoiding WGT on at least parts of those sites.
- Walking, wheeling and biodiversity linkages should generally be rezoned in the first instance to PPRZ with the balance of the land (as relevant) rezoned to PRZ. This will further support regional community facilities and prioritise options where Floor Area Uplift (FAR) benefits may be applied.

- **Concerns specific to Burwood**

The Burwood Structure Plan and Station Precinct is noted to span two municipalities of the City of Whitehorse and the City of Monash. The municipal boundary being located along Highbury Road, where a much smaller area of the precinct (approximately a quarter) is located within the City of Monash. The balance of the Burwood Station Precinct is within the City of Whitehorse, which is focused on the new station precinct (located south of Burwood Highway and east of Gardiners Creek), and the Burwood Highway corridor (including Deakin University, PLC, Mt Scopus College and the commercial nodes at Warrigal Road, Burwood and Station Street, Burwood).

Council observes that the proposed Burwood Station will function to introduce a new station where one does not currently exist, which means it differs from other SRL stations which are being proposed where it would create a new confluence of two separate metropolitan trainlines. Notably the new Burwood Station is also not being facilitated in conjunction with an existing activity centre. The location of the new station was chosen largely to service Deakin University, where it will leverage off that and other educational uses within proximity. Existing land use surrounding the SRL

Burwood Station and specifically to the south is typical of a low-density suburban area.

In Council's view, this existing urban context of the proposed Burwood Station Precinct should strongly influence the anticipated scale and intensity of future development to be facilitated. From this perspective, a lower order of development is anticipated at and around Burwood Station compared to other new stations which are to be developed in conjunction with an existing activity centre, and established train line and existing station.

- **Development scale at Burwood Station precinct**

The Structure Plan at *Figure 8: Burwood Conceptual Precinct Plan* nominates that land at and surrounding the Station Precinct will be subject to significant change. Given that different SRL stations will have different development scales based on context, it is considered that proposed development scale around Burwood Station needs to be tempered in its significance relative to the surrounding context and the fact that it is not associated with an existing station or activity centre. *Figure 14: Enhancing place plan – Preferred maximum building heights* (page 63) nominates a scale of 17-20 storeys immediately at the station precinct. It is acknowledged that this height is clearly tempered in relation to the built form scale outlined for other SRL stations, such as Box Hill. However, at 17-20 storeys and approximately 6-11 storeys at its immediate interfaces, Council is of the view that this built form is to a scale and intensity which is not justified by Burwood's contextual location, both currently and proposed. Council believes the consideration of appropriate built form scale for the Burwood Station core and its surrounds should be further interrogated. We note that the floor space demand to 2041 is only 48% of the theoretical capacity which suggests that there is sufficient room even with a buffer to ensure that the built form context is more appropriate to the area.

- **Impacts on Creek Corridor**

A specific focus on the biodiversity, character and recreations value of Gardiners Creek is noted throughout the background documentation. It is notably included within the Structure Plan's overarching vision (Page 4), as follows:

As an important biodiversity corridor and a treasured community amenity, an enhanced Gardiners Creek (Kooyongkoot) will be a focal point of the area. Its extensive network of open spaces and wildlife habitats will bring people together to experience nature and encourage the active, outdoor lifestyle that people in Burwood enjoy.

Despite the emphasis on the amenity, social and environmental values that the creek corridor provides (or will provide), specific requirement for its protection is notably absent from the Amendment. This is evident in the drafting of BFO controls, relating

to both building height and overshadowing. Some of the most intense / significant preferred building heights are proposed to directly interface with creek corridor (being one of its narrower points), at preferred building heights of up to 41 metres (7-11 storeys) or 69 metres (20 storeys) around the Station development area. Any applicable overshadowing standards which apply to these areas are also noted to be discretionary. Furthermore, the current wording in the variation to the overshadowing standard in BFO4 essentially allows overshadowing of the creek where buildings meet the preferred maximum building height, as follows:

Buildings should not cast any additional shadow beyond that cast by the applicable building envelope specified in standard BF02, BF05 and BF06 of this schedule over public open spaces shown on the Development framework (Map 1)...

The wording of the standard therefore supports overshadowing as a result of the preferred building heights of up to 69 metres in and around the creek corridor (depending on the lots preferred maximum building height designation). As a discretionary standard, even if a proposed development exceeded this preferred height (i.e. casts a shadow beyond the applicable building envelope shown in the Development framework), there is no mandatory requirement to protect the banks, waterway and associated public open space in the creek reserve. In Council's view this is a matter of significant concern given it will not achieve the Structure Plan's overarching vision.

- **Concerns specific to Box Hill**

Development scale and master planning

Based on the established road width and overall grandeur of this section of Whitehorse Road, in Council's view the Box Hill Structure Plan could far better leverage off Whitehorse Road as a tree lined boulevard with the potential for significant development in a targeted area immediately to the east of the commercial core.

Specifically, the section of land bound by Maroondah Highway / Whitehorse Road (to the north), the railway corridor (to the south), Middleborough Road (to the east), and Linsley Street (to the west) is identified as an area of land that can provide for more significant development than has been identified in previous structure planning processes

The Structure Plan proposes land east of Linsley Street and along part of Whitehorse Road with preferred maximum building heights between 27 metres (7-8 storeys), and up to 133 metres (34-40 storeys) along Station Street. However, it also applies a lesser preferred maximum building heights of 25 metres / 6-7 storeys on lots abutting Bishop Street within this same pocket of land. Whilst we consider that

this area has the potential to accommodate more significant development opportunity this should be subject to further detailed review

More broadly, in acknowledging this area of land offers greater development scale opportunities, we recommend that it be nominated as a separate investigation area to require a specific master planning process to be undertaken. The function of the masterplan process would be to consider opportunities to create a unique and true boulevard built form treatment in this confined area of Box Hill with a view to accommodate multi-level buildings in garden setting and accommodating mix of office, residential and commercial land use. The master planning process could also potentially review the existing laneway / street access arrangements, and investigate the potential to restructure the surrounding land parcels to maximise the development opportunities within this distinct opportunity area in Box Hill.

2.2 Securing Housing Choice

- **Affordable housing**

The SRL precincts present a significant opportunity to facilitate substantial additional affordable housing through appropriately drafted affordable housing contribution requirements. Unfortunately the Amendment does not do this. It is disappointing to see that despite the PRZ schedules including an objective “to increase the diversity of housing types, including the provision of affordable housing”, and the BFO including the objective which encourages a diversity of housing types including affordable housing, none of the planning control requires the provision of affordable housing.

Rather, the approach taken to facilitate affordable housing is entirely reliant on the Voluntary Public Benefit Uplift Framework (VPBUF), a negotiated and voluntary approach. Given the VPBUF is not applied on all land in the precincts, landowners within Box Hill and Burwood who cannot utilise the VPBUF may use this as a justification to not provide affordable housing, even though their development may be at a scale where an affordable housing contribution is appropriate. Developers using the VPBUF can also choose to provide public realm improvements, affordable housing or strategic land use: these options amount to critical infrastructure that should not be traded off at the expense of the other, at the discretion of individual developers.

It is also noted that while other planning pathways like clause 52.23 require the provision of 10% affordable housing in return for a perceived expedition in the planning approvals process, the ability to use the deemed to comply mechanism proposed under the BFO without any concurrent obligation to provide affordable housing, seems to be self-defeating.

Council observes that the *SRL East Housing Needs Assessment Burwood* identifies a gap of 21.% of the total additional social and affordable dwellings required by 2041 (or 550 dwellings). The Assessment outlines:

There is a large discrepancy between the existing supply and projected eligibility of social and affordable housing. An extra 550 dwellings are estimated to be required by 2041, representing 15% of the total additional dwellings required identified in the previous section. With no upward trend in social and affordable housing seen in the last ten years, it is likely policy settings will be required to shift within the Structure Plan to stimulate supply. Additional social and affordable housing could also be used to house the expected number of key workers within the Structure Plan (pg. 89).

The *SRL East Housing Needs Assessment Box Hill* identifies an even greater shortfall:

In 2041, 2340 households are estimated to be eligible for social and affordable housing. Accounting for the existing supply (150 social and affordable dwellings), the gap of 2190 households represents 37% of the required net additional dwellings (5920 dwellings by 2041). The lack of new supply of social and affordable housing indicates that a range of initiatives may need to be used to stimulate more affordable and social housing within the Structure Plan Area (pg. 87).

Council has concerns about the failure to require the provision of affordable housing through the Amendments, in light of the serious projected need identified in the SRLA's own background assessments.

While, as noted above, the Amendments as exhibited contain some general policies, objectives and decision guidelines that encourage the provision of affordable housing, these:

- are expressed as policies rather than requirements; and
- there are no numerical standards stated in the Amendment documents to identify minimum requirements to be aimed for.

Council has highlighted the different mechanisms generally relied upon and the risks involved without providing some mandate for the provision of affordable and social housing.

Mechanism	Risk
S 173 Planning and Environment Act 1987 (PEA1987).	Developer led negotiated outcomes enabled through the planning permit process do not guarantee more affordable (including social) housing.
VPBUF	The VPBUF provides a voluntary option for developers where floor area ratios may be exceeded if the developer can provide a public benefit. However, the range of uplift options (in addition to affordable housing) such as public realm improvements and strategic land uses suggests that affordable housing may not be the preferred benefit delivered.
Utilising Crown Land	The background reports ¹ identify that social and affordable housing can be facilitated on surplus State Government (Crown land). Such land in the Structure Plan areas is in limited supply and unlikely to contribute to any significant increase in the number of social housing units in either Structure Plan area.
Lot consolidation	Achieving greater building heights and development densities for greater housing choice relies on lot

¹ AJM Joint Venture. "SRL East Draft structure plan – Burwood – Housing Needs Assessment", February 2025.

Mechanism	Risk
	consolidation which will take considerable time to assemble development sites.
Major university and hospital campuses	It is not clear about how much key worker housing and student accommodation (housing) can or will be provided by these major institutions either on their campuses or adjacent to them.

In light of the above, it remains unclear how much affordable housing (if any) will be delivered within the Precincts.

Council requests

- The Amendment should require the provision of affordable housing in stronger terms.
- The State should take a more active role in the provision of affordable within the Precincts by making affordable housing a central objective of the housing objectives backed up by clear planning controls.

2.3 Urban Design considerations - general

There are considerable urban design issues raised by the Structure Plans. An initial review so far leads to the following observations.

The Structure Plans and the suite of background documents have not clearly articulated the logic and flow for its built form proposition, how it incorporates all the technical findings to the recommendations and have not been faithfully translated into the Amendment documents. Further exacerbating this issue is that key information is dispersed across a large number of documents, some of which contain conflicting content, making it difficult to navigate.

As a general observation, the Structure Plans have adopted a standardised approach that seeks to realise a relatively standard urban form across each of the Precincts. Then, specific types of 'place types', or 'building typologies' are proposed that respond to the different contexts/ neighbourhoods. These have been used to emphasise the sense of transition from 'central core' to the edges. The appropriateness of this approach remains to be considered in further detail and testing.

- **Translation issues**

Whilst the various 'place types' is a logical starting point, they appear not to have been considered in tandem with subdivision patterns, and other key place attributes that make each precinct unique (i.e. protection of key views / vistas, or topographical response to places). It is noted that the transition from one precinct to the next appear abrupt and may warrant further refinement.

While each draft Structure Plan contains a description of the future character, these have not been translated or referenced into the Amendment controls. In fact, at times there is no logical connection between the neighbourhoods as identified in the draft Structure Plan with the relevant BFO schedule. Consequently, to understand the intent of the planning for the precinct one is required to both refer to the draft Structure Plan (for the neighbourhoods) and then one or more the BFO Schedules noting that the schedules do not align with the neighbourhoods.

We also note that the approach to the PRZs is similarly confusing with none of the areas within a schedule aligning with the neighbourhoods in the draft Structure Plan. While both approaches to drafting the controls are open, if one of the objectives was to streamline planning then a more consistent approach between the identified neighbourhoods and the PRZ schedules and BFO Schedules would have been more desirable. For completeness we also note that there is no alignment between the PRZ Schedules and the BFO Schedules.

Between the PRZ Schedules and the BFO Schedules, neither of them capture the future role of each neighbourhood as set out in the draft Structure Plan. It needs to be understood that as currently proposed, a background document does not have a formal role in decision making based on the Practitioners Guide to Victoria's Planning Schemes DELWP June 2024). This comprises a material gap in the statutory implementation.

- **Operation of FAR**

The mandatory FAR can be exceeded on sites eligible for Public Benefit Uplift Framework. However, it is unclear whether the proposed building envelopes can actually deliver upon the Precinct Vision and overarching objectives. The baseline FAR's have been set considerably lower than what can be delivered under the BFO Schedules' built form envelope.

Closer scrutiny is needed to ensure BFO building envelopes truly support the Precinct vision as they will be used to assess the appropriateness of future development.

- **Sensitive areas**

Some areas of sensitivity have been identified in the Urban Design Report (Strategy UF1), including pockets of land where increased height is less appropriate — such as land on the north side of open space affected by a Heritage Overlay, and areas at the edges of the Structure Plan boundary affected by a Neighbourhood Character Overlay and adjacent to land zoned GRZ or NRZ outside the precinct.

However, when reviewing the urban design report, these areas of identified sensitivity do not consistently align with those mapped or referenced in the report itself. As a result, the height changes proposed in the Planning Scheme Amendment appear inconsistent with the stated methodology and strategic intent.

While the BFO requires the Development Framework to identify sensitive interfaces and areas where built form must transition to surrounding context, it remains unclear how 'sensitive interfaces' have been identified or defined — particularly where proposed heights fail to align with those initially identified in the urban design report. For example, in the Built Form Schedules for Box Hill and Burwood, there is no identification of sensitive interfaces.

- **Solar access to footpaths**

While solar access to open spaces is dealt with elsewhere, the Assessment of Solar Access Report identifies only two street types—Active Street and Main Street—where some solar protection to footpaths is considered.

In contrast, the Urban Design Research Paper highlights 'green streets' as key priority walking and cycling routes, where pedestrian and cyclist amenity is to be

prioritised. Despite this, no solar protection is proposed along these routes, except within residential neighbourhood precincts.

In the context of a need to encourage active transport, this narrow approach raises concerns particularly with the high mode shift targets which have been specified for the centres. The BFO states that the associated development framework is to 'Include a movement and place framework that is consistent with Movement and place in Victoria (Department of Transport, February 2019).' Council questions whether this limited approach to solar protection is consistent with the Department of Transport and Planning's Movement and Place Framework, particularly in how walking and cycling corridors are classified and treated in terms of amenity and comfort.

- **Street Design and Active Transport**

Appropriately, the SRL Precinct Vision is fundamentally seeking to reduce reliance of private car vehicles and to aspire for precincts that emphasise active transport . However, the level of investment in built form (including its testing, feasibility, etc.) is out of kilter with the level of investment in ensuring that active transport infrastructure genuinely delivers the vision.

There is limited information for how safe, quality cycling infrastructures are to be provided in areas where road space is limited and modal priorities are not explicitly clear or fully resolved. Across five street types identified in the draft Structure Plans, bicycle infrastructure is only represented in Green Street typical cross section.

2.4 Urban Design considerations – specific

The Vision for Box Hill as set out in the draft Structure Plan and in the policy and planning provisions does not sufficiently position the centre with the shape and vision for the future shape of Melbourne. The regionally significant strength of the centre as a transport and services node, the centre for tertiary and private health services and Victoria's largest Vocational Educational campus each should be acknowledged as key components of the future success of the region and to Box Hill centre itself. For example:

“Box Hill is the pre-eminent urban centre for Melbourne's east. The vibrant, diverse, multicultural centre and reimagined central Whitehorse Road Promenade and flanking parks, support a regionally significant focus on health, education and employment serviced by a Public Transport superhub.”

The neighbourhood descriptions in the draft Structure Plan, should better reinforce and identify key elements of their identify and role.

- **Central Box Hill Neighbourhood**

The Central Box Hill area is already one of Melbourne's busiest transport interchanges and the SRL, will integrate a broad bus, tram, and metropolitan rail network with this integrating orbital rail corridor. Arguably this site will be the “superhub” of the east that Sunshine will be in the parallel Airport SRL phase component. The narrative in the draft Structure Plan at part 6.2 fails to properly identify the key elements of this key neighbourhood in terms of its key attributes and characteristics. Instead the future role and objective is focussed on matters that the BFO and the PZN in combination are capable of dealing with. Council submits that the future role and objective for the neighbourhood within the draft Structure Plan should be reviewed and refined. For example to state that the activity centre will continue to grow as the “high activity centre of the Structure Plan area” is relatively meaningless and speaks more to the built form than the role of the neighbourhood.

Within the Central Box Hill neighbourhood, Council submits that the two church sites should be identified as Civic, Community and Cultural not as significant commercial sites earmarked for significant Commercial Scale or significant Housing as variously mapped in the current plans. The mapping of the historic St Andrews and Hanbit Uniting Church with a preferred scale of 133m and the St Peters site for 49m is in each case unhelpful in their integration to the adjoining context.

The Harrow St and Watts Street carparks should be remapped within Neighbourhood A: Central along with their related access arrangements.

- **Health and Education Neighbourhood**

The stated vision for the Health and Education Precinct description as a place **to live** and work....., sits at odds with its neighbourhood descriptor and the later land use plan where a **health** priority is signalled. This will not in Council's view provide clear guidance as to the core measures of success that should underpin the Structure Plan. In a similar vein to the experience of renewal that occurred in Melbourne's City North, housing will potentially cannibalise development opportunities which should be for the core Health purpose of the neighbourhood.

The neighbourhood should have its focus as a higher allocation of space for employment in the Health and Education sectors and its vision should reflect this and the protection of this important and core ambition particularly given the very substantial escalation of ambition for residential south of Whitehorse Road.

The optimisation of the role and function of Box Hill as a regionally significant focus for health and education will only be optimised through planning mechanisms that prioritise the delivery of health and education floorspace in this neighbourhood.

Council recommends that the preamble for the Vision for the Precinct B Health and Education Neighbourhood should be amended to read as follows:

A high-amenity regionally significant Health and Education precinct that prioritises health and institutional uses over residential uses with new buildings, lively streets, improved walking and cycling links and enhanced public realm.

Council is also concerned that the building height signals in this area are greater than what is traditionally applied to institutions delivering tertiary health, education, treatment and training.

- **Laburnum neighbourhood**

Laburnum has important education and recreation roles which do not come through the description of its future role and objectives. This touches on the issue raised previously about a lack of alignment between the neighbourhoods identified in the Structure Plans and the approach advanced by the Precinct Zone and the Built Form Overlay's various schedules. Changes should be made in this respect.

- **Overshadowing**

While the Structure Plans seek to ensure that development maintains reasonable solar access to key streets and open spaces, Council submits that this objective has not been properly followed through in the framing of the planning controls.

An objective is as follows:

The Whitehorse Road Linear Reserve is intended to be the primary gathering space for the Structure Plan Area. It warrants the highest level of solar access protection.

However, the primary midblock interconnection of Main Street to the Tram terminus and Bruce Street connection to Box Hill Gardens, currently the primary mid-centre pedestrian crossing and historically with the area east of Station Street the primary urban spaces, would be in shade for most of the day offering poor amenity in the place of greatest pedestrian movement and aggregation.

The Amendment includes no assessment of how the proposed controls would be applied equitably given the multitude of sites and ownerships, nor how it would be applied to ensure minimum impact occurs to areas that deserve the highest amenity. Council submits that Whitehorse Road is the preeminent urban space for the Central area and should have the highest levels of solar protection.

The solar access to Box Hill Gardens also needs to be reconsidered especially noting the curious approach taken in the supporting assessments, namely that solar access at Box Hill gardens is an alternative to the lack of solar access along the central linear spine. In this regard it is noted that the Box Hill Gardens are a 500m walk approximately or in the order of 6 – 7 minutes. This is not likely to really be a practical alternative for workers and residents.

In any event, Council notes that the proposed extent of development north of the gardens and the central flanks to the east will have substantial impact on the solar access to this park. Shadow assessments suggest a scenario where in the morning the primary walking network and gateway to the precinct from Station Street and the northern park facing facades of the eastern end of Irving Avenue are in shadow with this impact on the arrival footpaths extending until 11am and on the arrival eastern footpath until after 11am.

The modelling for the western end is predicated on the eastern hospital façade serpentine footprint and scale rather than the orthogonal 52m scale shown in the built form provisions for this area. It would be reasonable to assume that this valuable land at the interface of the corner and the ageing eastern component of the hospital would be developed in the future given its relatively unencumbered and has two street frontages. The shadowing analysis should have taken this into account.

To the north of the park the increase in scale to 21m and increasing of flanking form to 52m have each compromised the amenity of the park without reasonably anticipated additional impacts arising from the potential Hospital redevelopment to the west.

Council notes that the floor space demand for Box Hill and Burwood as a proportion of theoretical floor space capacity at 59% and 48% respectively, suggest that there is scope to moderate some of the built form aspirations in favour of the protection of solar amenity.

Given these impacts and implications, Council urges a reconsideration of the built form provisions and solar access provisions to meet the following outcomes:

- **Whitehorse Road Lineal reserve**

Amend the provisions of the proposed standards for the central spine to include measures protecting the overshadowing of open space south of the central tram lines between the hours of 11 am and 2pm at the September Equinox from additional overshadowing.

- **Primary North South Walking Streets connecting neighbourhoods and destinations**

Ensure the amenity of the key north-south walking streets of Bruce St, Nelson Road and Station Street to provide for sunlight to the east or west footpath between 11am and 2pm at the September Equinox.

- **Box Hill Gardens**

Ensure that there is no additional overshadowing on Box Hill Gardens arising from new residential development to the immediate abutting north or new areas east of Station Street or the RSL to the south west between 11am and 2pm at the Winter Solstice.

Ensure there is no additional overshadowing on Box Hill Gardens arising from new development in the Health and Education precinct between the hours of 11 am and 2pm at the September 22nd Equinox.

- **Ellingworth Gardens**

Ensure that the south footpath of Ellingworth Parade at its interface with the gardens is protected from overshadowing between 11am and 2pm at the 22nd September Equinox.

Ensure that there is no additional overshadowing over and above that generated by a 11m high side wall interface to the Ellingworth Gardens between the hours of 11am and 2pm at the 22nd September Equinox.

2.5 A high quality public domain: Open space, tree canopy and biodiversity

- **Open space**

Open space is critical to creating healthy communities. It plays a significant role in place-making, creating character and a high quality public domain, ensuring liveability and the wellbeing of both residents and worker populations. In circumstances where the SRL precincts are projected to experience significant increases to density, ensuring the provision of appropriate open space is essential.

Council has concerns in relation to the way the Structure Plans and associated documents provides for open space in relation to the forecast populations.

The Structure Plans are underpinned by the Open Space Technical Report, which includes an open space needs assessment. Council considers that there are some issues with the assessment that need to be further considered to ensure that open space is properly planned for the future SRL populations. In particular, Council raises the following concerns with the Open Space Technical Report and the Structure Plans:

- The Open Space Technical Report recommends a 400m walkable catchment as one of its primary metrics, although this does not appear to have been applied to all open space. Council is not convinced that the 400m walkable catchment is appropriate, noting that it is unclear whether the catchment is based on 'safe' access. The catchment needs to take into account barriers to safe access, such as the need to cross major roads. Further, the 400m walkable catchment is referred to as being a 5 minute walk, whereas it is likely to be more like 7 minutes. Council is concerned that this is not an equitable or inclusive metric, and slower walking speeds should be considered to account for the range of people that should be able to access this space.
- The Open Space Technical Report includes quality as a primary metric for the open space needs assessment and aims to bring all open space in the Structure Plan areas to a high quality. Further work is required to ensure that the quality of open space has been appropriately assessed, including having regard to adequacy of winter sunlight access, whether it is unencumbered and functional at all times, adequacy of public road access to maximise passive surveillance opportunities, retention of mature trees and ability to incorporate sustainable water supply.
- 9 sqm open space per person has been used in the Open Space Technical Report as a secondary measure. Council considers this to be significantly

lower than what is considered acceptable in 2025, given the latest research which highlights the importance of green public open space to community health and wellbeing, particularly to those vulnerable.

- The worker populations have been not accounted for, and need to be considered, as it will not only be residents within the SRL precincts using the open space.
- Using population forecasts to only 2041 is insufficient, as this is only 6 years from the target project completion date.
- While it is acknowledged that the precise location of new open space is not known prior to the implementation stage, the existing Conceptual Precinct Plans in each of the Structure Plans do not show any new open space - even diagrammatically. In the individual Neighbourhood Plans, the circles indicating the area of open space are very broad, and not articulated as part of the overall land use planning and vision. Council is concerned that excluding them from the Structure Plans means it is easy for them to be overlooked during implementation.

Council has also identified particular concerns in relation to Box Hill and Burwood as follows.

- **Box Hill**

The Structure Plan does not propose enough new open space to meet the needs of the population which is forecast to grow significantly as a result of the Box Hill SRL station.

The Structure Plan proposes only two new open spaces within the whole structure plan area, with the Open Space Technical Report citing there are no other gaps that require new open space. The two new open spaces are:

- New local pocket park civic space at the entrance to the new Box Hill SRL Station on the north side of Whitehorse Road (committed)
- New local neighbourhood park civic space proposed by the Vicinity Development referred to as a Spanish Steps inspired amphitheatre (potential, delivery date unknown).

The *Whitehorse Open Space Strategy 2024 (WOSS)* already identified the need for new local open space in the same location as the Vicinity Development. This means that the SRLA is only proposing one new small open space (less than 0.2ha) that is not already shown in the WOSS. This is not acceptable, given the extent of change that will result from the SRL project which is not accounted for in Council's WOSS.

Further, Box Hill Gardens and Whitehorse Road Reserve will be impacted during the construction phase of the project. Two temporary replacement sites are proposed to be located on Council owned land, comprising:

- Court St and Watt St Box Hill, located on a former childcare centre and car park owned by Council - total size nominated as 2,750 sqm.
- Ellingworth Parade, located on the existing Council owned car park that was identified for new open space in 2020 before the SRL works in Box Hill Gardens was identified - total size nominated as 3,500 sqm.

The total area of the two offset sites is less than one hectare, being less than the area in Box Hill Gardens that is to be impacted by construction. This is unsatisfactory, particularly noting the length of time the construction is to occur.

Council considers new open spaces will likely be required in additional areas, including potentially:

- South of the railway to Brougham Street, and between Elgar Road and Station Street.
- Just south of the railway between William and Barcelona Streets including to improve east-west access.
- East of Station Street and south of Severn Street
- South Maroondah Highway between Miller Street and Short Street
- South of Maroondah Highway to the railway east of Middleborough Road

Further, Council considers the former Box Hill Brickworks at 14 Federation Street should be acquired by the SRLA to be used as permanent regional open space. The site is benefitted by links to Surrey Park and Surrey Drive Reserve. As a past land-fill site, the land is known to be contaminated, and unlikely to be suitable for intense residential development without significant rehabilitation. Council considers that the opportunity to secure this site, to ensure open space for the future population of Box Hill should be highly prioritised.

- **Burwood**

The Draft Structure Plan (OS Technical Report) lists six new open spaces in the report, however only three of these are actually new open spaces. The other three are reconfigurations of existing open space reserves including Gardiners Creek Reserve and the former Sinnott Street Reserve. In terms of the total amount of open space, it is unclear if there will be a net reduction in open space land area. Council is continuing to undertake work to understand this.

The new open spaces proposed in the Structure Plan area comprise:

- New local neighbourhood park (0.2 to 0.5 ha) in the McIntyre Street/Cromwell Street area south of Burwood Highway and west of Gardiners Creek. This

location is already identified as a future potential Neighbourhood open space (min 1.0 ha in size) in the WOSS, Given the extent of change proposed Council considered a minimum 1.0 ha size is required.

- New local neighbourhood park (0.1 to 0.3 ha) around Delaney Avenue/Milford Avenue, north of Burwood Highway and West of Station Street. While Council agrees that new open space will be needed, the size and type of open space required is unclear given the extent of change being proposed in the adjoining Mount Scopus Memorial College is unknown. If there is substantial change proposed, then additional open space may be required and should be included in the Structure Plan.
- New local pocket park (linear park) to link Lundgren Chain Reserve to Gardiners Creek Reserve. This future link is required and was already identified in the WOSS.

Again, as is the case in Box Hill, Council considers the open space proposed to be provided in the Burwood Structure Plan to be insufficient to accommodate the substantial increase to the population. Council is continuing to do work to understand where new open space may be required, and considers the following locations are likely:

- North of Burwood Highway between Warragul Road and Parer Street
- North of Burwood Highway, east of Station Street
- South of Burwood Highway, east of Station Street
- South of Highbury Road, west of Gardiners Creek
- **South of Highbury Road, east of Gardiners Creek. Tree Canopy and biodiversity**

Council supports the Structure Plan target of achieving 30% canopy tree coverage. Council is keen to ensure this target is achieved, given the importance that canopy cover has to the liveability of neighbourhoods, habitat creation and reducing the urban heat island affect.

However, Council considers the proposed planning controls and the policies which are intended to implement the Structure Plans do not ensure that the 30% canopy tree cover target will be achieved. For one thing, the target is not mentioned in any of the policy or the controls. As for the policy, on one view, the fact that the neighbourhood character policy does not apply suggests that none of the canopy objectives within it are relevant to Structure Plan areas.

The PRZ and BFO schedules need to be redrafted to reflect the intention of achieving increased canopy tree coverage and at this target level. This is particularly important given the proposed removal of the interim Significant Landscape Overlay –

Schedule 9. Council is concerned that without a redraft of the planning controls, not only will additional canopy coverage not be achieved, but there is a risk that existing trees will lost.

Further, Council notes that built form envelopes proposed through the draft Structure Plan and controls will mean a significant proportion of the new canopy cover will need to occur in the public realm. For example, Central Box Hill, the Central Core', 'Main Streets' and 'Central Flanks' place types propose 100% site coverage and will therefore need to rely solely on the public domain for tree planting. Further, the public domain local streets are spatially encumbered by power lines, crossovers and underground drainage and will need to include a range of amenities and conditions normal to city centre public realm, this will limit tree canopy and root zone growth. Finally, with the public realm to bear a significant portion of the canopy cover, new public open space will play a key role in this. Council has already outlined its concerns about the insufficient level of public open space proposed in the section above. These are all issues that impact on the feasibility of achieving the 30% canopy coverage target.

Accordingly, Council considers further work is required to strengthen the planning policy and the controls to ensure that the 30% canopy coverage target is addressed both in the precinct planning process and its subsequent implementation.

2.6 Community facilities

Council agrees that provision of community facilities to support the transformational growth in the Structure Plan areas is critical. It is therefore essential that the Community Infrastructure Needs Assessment is examined to ensure that the needs of the community are appropriately planned for. Council has identified issues with the Community Infrastructure Needs Assessment and considers that it should be revised to address the following:

- The forecast age profiles for the populations within the Burwood and Box Hill precincts. It is not possible to properly plan for a community without understanding the age of its population, which is likely to change as the area transforms.
- Early years' service requirements, particularly three- and four-year-old kindergartens.
- Whether the library service benchmarks are appropriate, particularly where libraries are recommended as 'anchor facilities'.
- The number of workers anticipated in the area and the proportion of workers who may use community services.
- Full relevant data on the existing condition, fit-for-purpose or design life of community facilities currently located in the Structure Plan area.
- Potential for optimising existing facilities through physical renewal and service planning approaches.
- The proportion of the anticipated SRL catchment population that will be located in each local government area, noting that the Burwood catchment area includes the suburbs of Ashwood Burwood and Mount Waverley, which are in the City of Monash. This information is critical to understanding what infrastructure each Council will need to provide.
- Consideration of, and alignment with, Whitehorse City Council's Draft Community Infrastructure Plan 2052.
- Service opportunities including supporting existing residents to 'age in place' and planning for early years infrastructure within school sites.
- The timing for delivery of infrastructure.

Further, Council raises the following issues that are specific to each of the Structure Plan areas:

- In Box Hill, Council considers that sites purchased by the SLRA should be prioritised for the provision of community facilities and infrastructure.

- In Burwood, the Community Infrastructure Needs Assessment considers three potential sites for additional community facilities. Council supports the provision of a community hub in the Sinnott Street area and considers that the SRLA should ensure that sufficient space is provided to enable the hub to include a new library and maternal child and health care facility.

As to the delivery of the community infrastructure, Council reiterates that it cannot commit to funding the community facilities listed in the Implementation Plans. The projects have not been planned for in Council's forthcoming Council Plan and they are not listed in Council's DCP nor its 10- year capital works plan. The issues with delivery of the various infrastructure required to support the new populations and ensure the success of the SRL East project is dealt with elsewhere in this submission.

- **Active Recreation**

Closely aligned with community infrastructure is the provision of sports and recreation facilities. Council notes the assessment contained in the Community Infrastructure Needs Assessment but will reserve its assessment of this pending further research and analysis being conducted by Council.

2.7 Connectivity and accessibility

At the outset, Council acknowledges that the Structure Plan and associated technical reports have recognised the necessity of encouraging mode shift in the Box Hill and Burwood Structure Plan areas. Council is supportive of this.

In relation to traffic and transport, Council is concerned that the following general matters have not been resolved:

- The Structure Plans have not incorporated all critical linkages which are necessary to encourage mode shift in the Structure Plan areas;
 - The Structure Plans have been prepared on the basis of traffic modelling from the SRL EES which accounts for population estimates only for up to approximately 5 to 6 years post completion of the project.
 - There is insufficient detail in relation to the proposed active transport and sustainable transport solutions which will be required to enable the mode shift sought by the SRLA. This lack of detail makes it difficult to assess the feasibility and efficacy of these initiatives and plan for the funding of these projects.
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- **Transport Modelling and mode shift**

As outlined above, achieving a high degree of mode shift is a significant aspiration of the SRLA. Council supports the mode shift aspirations but is concerned that insufficient modelling and strategic work has been undertaken by the SRLA to justify and support the modal shift targets. It is necessary for clear guidance and recent data to be provided to facilitate the targets for active transport within the Structure Plan areas.

The provision of such data is also essential to understand the function and clearly articulate critical linkages through the Structure Plan areas. The Structure Plans have been prepared on the basis of proper principles however, there are gaps in the information provided.

The SRL East Structure Plan Transport Technical Reports for Box Hill and Burwood do not include any new modelling, rather the reports are based on modelling that was undertaken as part of the SRL Environmental Effects Statement in 2021 by AJM and KPMG.

Consequently, as the SRL East is projected to be operational in 2035, the 'base case' scenario for the modelling is up to 2041. This is only 5 to 6 years post construction. Presumably, development within the Structure Plan areas will occur prior to the SRL East being operational. The mode shift which is sought cannot be

achieved in the absence of the provision of the new transport. Further, Council questions the period in which mode shift is to be achieved. It is not clear whether proper consideration has been given to what happens after 2041 when development continues to occur within the Structure Plan areas. It is not the case that development will only occur up until the point when the SRL East becomes operational.

The delivery of the SRL Burwood and the SRL Box Hill will result in a significant mode shift towards public and active transport use. It is concerning for Council that the original modelling presumed population and employment based on a 2021 business case, rather than an updated business case which takes into consideration more recent data.

The key concerns in relation to the modelling are:

- (i) The 2021 modelling was undertaken prior to the formulation of building heights, density or development patterns in the Structure Plan areas. This means that the traffic impacts and modal shift requirements were not properly understood at that time based on the extent of development that is proposed.
- (ii) The 2021 modelling failed to go to the level of the structure plan area, however the *SRL Transport Technical Report* for Box Hill and Burwood are based on the Structure Plan areas. The 2021 modelling and EES Traffic Report provided an analysis of the base employment and population for 2018. The effect of this is that there is a misalignment between the data and targets.
- (iii) In the absence of updated data, it is impossible to understand how the targets for active transport modes will be achieved. The transport projects which are necessary to facilitate the desired level of modal shift must be clearly identified and incorporated into the Implementation Plan such that the timing and funding obligations for these projects is clearly understood at the outset.
- (iv) The traffic impact on all critical intersections within the Structure Plan area has not been properly considered. Council is concerned that the modelling undertaken for the EES in 2021 is not fit for purpose and does not include an assessment of all intersections in the Structure Plan area. The microscopic modelling focuses on the intersections within the Project Area, being those spaces near to the SRL Stations.

- **Common issues to Box Hill and Burwood**

Walkable and wheelable linkages are essential to enabling a transit-oriented city with increased urban densities. To be effective, these linkages need to be well coordinated with transport connections, open space, shopping centres, community

facilities and schools. The Structure Plans have been developed with the correct principles in place, however some further detail is required. Without these critical connections (proposed to be largely delivered by WCC), mode shift will not be fully realised.

Key messages:

A clear walking and wheeling network that goes beyond the boundaries of the Structure Plan areas is required.

Master planning local streetscapes to provide *Disability Discrimination Act 1992* (DDA1992) and Crime Prevention through Environmental Design (CPTED) compliant walking and wheeling infrastructure is complex and has long design development lead times requiring substantial budgets. Providing safe on road cycling connections is likely to require additional road space in some local streets. Council does not have the capacity or funds to acquire additional land for this purpose.

An updated Integrated Transport Strategy (ITS) and Wayfinding Strategy is needed to respond to CPTED, connect land uses, ensure clear sightlines and safe crossing points to further inform streetscape masterplans. It is not Council's role to deliver wayfinding to integrate different modes of public transport and this should be coordinated by the Department of Transport and Planning (DTP).

For tram connectivity between Box Hill and Burwood and to make better utilisation of the Burwood station, a commitment to expanding Tram route 70 from Riversdale Road to Burwood Highway via Elgar Road² is needed.

Council requests

- That the SRLA and State government address the road space and land requirements that may be needed to achieve linkages, so that they are safe, accessible and legible.
- That the State government commit to expanding Tram route 70 to Burwood Highway.
- **Box Hill**

There is limited intermodal connectivity between the existing Metro train station, the bus interchange and tram stops.

Better walking and wheeling connections are needed throughout the Structure Plan area and beyond. Some key linkages such as Nelson Road in the Health and Education Neighbourhood carry close to 10,000 vehicles per day and need more careful consideration for their future integrated transport role.

² Infrastructure Victoria, "Victoria's draft 30 year Infrastructure Strategy". March 2025. Page 39

The Box Hill interchange has been reviewed previously by successive governments, most recently the Ministerial Advisory Group (2017)³ which recommended short term actions to ensure improved access and passenger amenity upgrades. Medium and long term actions were also proposed which centred on improved transport connections and traffic management delivered through effective master planning with the Vicinity Centre and key agencies. Ultimately planning for the interchange requires identification of a new location to or confirming whether the interchange can be redeveloped in its current location to be fit for purpose and ensure higher standards in DDA access, wayfinding and walkability. A review of the bus network in accordance with Victoria's Bus Plan will expand the catchment for the train stations and provide a real alternative for people to reduce car ownership and use.

Council requests in relation to Box Hill:

- A new location for the Box Hill bus interchange must be included in the Structure Plans as a new facility that is properly integrated into the transport network.
- The bus network needs to be reviewed to ensure better connectivity across the precinct and its neighbourhoods.
- A stronger commitment is needed from the DTP in delivering key new and upgraded pedestrian walking and cycling links such as:
 - A pedestrian bridge over the Lilydale line between Nelson Road and Thurston Street.
 - Grade separated crossings at major roads such as Elgar Road, Station Street and Whitehorse Road. Prioritisation should be given to an improved connection over Elgar Road to support the Ringwood to Hawthorn trail along the rail corridor.
- **Burwood**

The Gardiners Creek corridor narrows significantly north of Highbury Road.

Major traffic routes and intersections in Burwood present a challenge to achieving connectivity and accessibility throughout the precinct

Council requests for Burwood:

- Widen the Gardiners Creek corridor north of Highbury Road to ensure better walking and cycling connections, and improved amenity for park users.
- Acquire key links in the Lundgren Chain for improved walking and wheeling connections.
- Upgrade and widen sections of footpath within the Structure Plan area including along major routes such as Highbury Road.

³ Ministerial Advisory Group, 'Box Hill Transit Interchange – Final Report', February 2017.

- The DTP should prioritise the delivery of safe at-grade pedestrian connections across major traffic routes in Burwood in conjunction with grade separated crossing points.
- Review cycling and pedestrian connections throughout the Burwood Structure Plan and beyond, including consideration of a continuous Gardiners Creek regional trail across Station Street).

2.8 Parking

- **Common issues to Box Hill and Burwood**

A key strategy of the Structure Plans is the implementation of changes to the car parking requirements in the Structure Plan areas by the Parking Overlay. These changes are said to be critical to achieving the mode shift targets for each of the Structure Plan areas.

For a long period of time, Council has supported reduced parking rates for developments in central Box Hill due to the proximity of bus, tram and train connections. Council's support for reduced parking in this area is reflected in the current Parking Overlay which applies to the Box Hill area (Council notes this is proposed to be deleted).

It is proposed to apply two new Parking Overlays to the Burwood Structure Plan area and the Box Hill Structure Plan area respectively.

For Burwood, it is proposed to apply a new Schedule 2 which includes maximum car parking rates and a new Schedule 3 which includes minimum and maximum rates.

The PO2 is generally applied to core areas (**Area A**) around the SRL station and the PO3 is generally applied to the broader area (**Area B**).

Similarly, the new Schedule 4 which includes maximum car parking rates and new Schedule 5 which includes minimum and maximum rates is proposed to apply to Box Hill. Council notes that there is a significant extension of the parking overlay area for Box Hill when compared with the existing parking overlay in the Scheme.

It proposes minimum and maximum car parking rates for development and land uses.

A balance needs to be achieved between the provision of parking which promotes mode shift and parking that supports those members of the community who rely on private transport options. The allocation of sufficient parking within developments will safeguard long term liveability in the Structure Plan areas by securing private transport whilst the local community adjust to mode shift. Shift workers, parents with young children, people with a disability and the elderly are examples of user types who value private transport options.

Council is concerned that maximum parking rates may result in a shortage of parking spaces which may lead to displacement of parking demand to other areas or local streets that have minimal or no parking restrictions. This will lead to new parking issues and potentially impact residential amenity where local residents will seek parking changes in their local streets.

For some individuals, especially those with disabilities or limited mobility, the lack of parking spaces close to destinations may create a barrier to access. Maximum parking rates may unintentionally reduce the number of accessible parking spots available, creating inequities in access.

While promoting sustainable transport options is a benefit, if public transport is not well planned or accessible (or not available at the time development is completed), this will undermine the aspirations of mode shift in the Structure Plan areas.

While maximum parking rates aim to address traffic congestion and possibly environmental concerns, they need to be implemented carefully and in conjunction with other measures like enhanced public transport and well-planned infrastructure.

- **Box Hill**

Despite the fact the Council has supported reduced parking rates in central Box Hill for a long period of time, the Health and Education Precinct has specific user needs; dedicated parking is required for patients, hospital visitors and shift workers who cannot rely on public transport at night. Similarly for apprentices and some students attending after hours classes at Box Hill Institute, parking may also be required.

Council requests

Further clarity is needed on the following matters:

- Parking users' rates where height limits are exceeded and the VPBUF is applied: will additional car parking be required? The proposal relies on the private sector to set parking rates.
- In delivering 'green streets', which is supported, increased canopy cover will mean a reduction in the supply of on-street car parking. How will this be balanced?
- Some land uses are missed in the Area B provisions.

Further review is needed of the Health and Education Precinct to respond to the parking needs of hospital patients and those supporting them, shift workers and apprentices.

Commitment from the State government on improvements to other modes of public transport. Mode shift away from private vehicles needs to be supported by improvements to all other modes of transport. In particular, bus service improvements in line with 'Victoria's Bus Plan 2021', that would see fast, direct and frequent bus services along the arterial road network so that buses are a time competitive option compared to private vehicles.

3.KEY ISSUES WITH PROPOSED IMPLEMENTATION

The Structure Plans are proposed to be implemented by the following suite of 'enablers'.

3.1 Box Hill and Burwood draft Implementation plans

Council will do its part of to provide for service delivery of infrastructure required to support the new resident and worker populations in the Box Hill and Burwood precincts. However, it is not possible for Council to be a major provider of the significant amount of community and physical infrastructure required to support these populations.

Council has not planned to deliver the projects listed in the draft Implementation Plans for Box Hill and Burwood in the foreseeable future.

The draft Implementation Plans for Box Hill and Burwood identify time frames and responsibilities and list Council as the lead agency for many local projects. Many of these projects are complex and suggest that the role of Council will encompass:

- Purchasing private land, rezoning it and leading the design, construction and maintenance of local public open space and community facilities;
- Facilitating shared user agreements for local sporting clubs to utilise school and university campuses;
- Leading the design, construction and maintenance of local streetscapes where streetscape master planning is needed;
- Delivering walking and wheeling crossings and wayfinding in the active transport network.

Council is concerned that the draft Implementation Plans may not contain all of the actions arising from the draft Structure Plans and other documents. It is important that the Implementation Plans provided list of all projects needed to deliver the transformed communities into the future along with a funding strategy that does not rely on Council.

In the Burwood area the Structure Plan area is shared with the City of Monash. The Monash component of the Burwood Structure Plan area is adequately serviced with a generous amount of open space provided on the Gardiners Creek corridor. As no new community facilities or open spaces are planned for the area south of Highbury Road further consideration should be given to the costs of infrastructure delivery and whether this infrastructure is funded by State government, preferably, or shared by Monash and Whitehorse Councils.

Council has no current commitment to delivering many of these projects. They are not listed in (i) the forthcoming Council Plan (2025-2029) (ii) Council's Development Contributions Plan (for Box Hill only) and (iii) Council's 10-year capital works plan.

Council considers that it is vital for the SRLA to provide support for the key projects listed in the draft Implementation Plans through:

- direct capital funding mechanisms; and
- compulsory acquisition of private land and rezoning to ensure ground level open space, linkages and in some cases, facilities.

Further, the draft Implementation Plans must be reviewed for completeness to ensure all necessary actions are included.

3.2 The Voluntary Public Benefit Uplift Framework (VPBUF)

The VPBUF is proposed to be enabled through the schedule to the PRZ (and some BFO schedules) which specifies a standard (limit) that may only be exceeded where an eligible public benefit is provided. These benefits include (i) public realm improvements (ii) affordable housing and (iii) strategic land use such as commercial, office or healthcare.

Council submits that a private sector led voluntary model should not be relied upon to deliver the public realm that is required to support the intensive growth of the Precincts. Public realm improvements through the voluntary uplift scheme will only likely replace the type of public realm improvements that are normally leveraged through the proper and detailed consideration of larger development proposals. There is ample precedent for this in Box Hill.

Delivering public realm improvements over key linkages or widened footpaths across multiple sites requires an extent of coordination and agreement that is unlikely to be achievable.

Council also questions the provision of uplift for commercial office floor space. It is difficult to understand what the public benefit of such floor space is. The planned employment increase does not merit "development subsidy" and will distort the market's own way of identifying and leading to an economic balance of what is feasible.

The VPBUF will be complex and costly to administer. If it is proposed to maintain the scheme, the costs of reviewing proposals should be built into the proposition.

Council also would insist that given the complexity involved in negotiating such outcomes, there is only one responsible authority for the Precincts. The availability of adhoc ministerial pathways via development facilitation will make managing the

delivery of the Precincts more difficult by breaking up the consistency of decision making.

4. CONCLUSION

Since 2021 Whitehorse City Council has worked collaboratively with the SRLA on the Suburban Rail Loop project. Council acknowledges the extensive work the SRLA has undertaken in preparing the above Amendments which include the draft structure plans for the Burwood and Box Hill precinct areas, draft implementation plans and draft parking precinct plans.

Council considers that the success of the precinct planning will be determined by delivering necessary infrastructure as the residential and daytime populations grow. Infrastructure includes open space, community facilities, environmental initiatives and active and public transport improvements. Transport projects such as a new bus interchange at Box Hill, extending Tram Route 70 to Burwood and upgrading local streets for better walking and wheeling will also support mode shift from the private car to public and active transport options.

Council also believes that the SRLA should consider acquiring additional key sites in Box Hill (such as the former Box Hill brickworks) and additional sites in Burwood (such as land adjacent to the Lundgren chain) to meet the current open space deficit. Securing land for open space, regional sporting facilities and key walking and wheeling linkages will also provide physical space for large trees and understorey which are key structure plans priorities for responding to urban cooling and supporting biodiversity.

Another key issue in structure plan implementation is the lack of certainty around the number of affordable homes that will be delivered via section.173 agreements (*Planning and Environment Act 1987*). Similarly, Council is also concerned that the Voluntary Public Benefit Uplift Framework (VPBUF) enabled via the new PRZ and the new BFO schedules does not mandate a supply of one type of public benefit, (such as affordable housing) over another.

Lastly, Council believes that the new planning controls, whilst intended to streamline planning processes for the private sector, are overly complex leading to uncertain planning outcomes in built form and heights, land uses and public benefits including the supply of open space, strategic land uses and affordable housing.