



Whitehorse Amendment C175

Box Hill Central

Expert Urban Design Evidence

Mark Sheppard

July 2017

Instructed by
Norton Rose Fulbright

On behalf of
Vicinity Limited



Contents

1.0 Introduction.....2

2.0 The Role of the Box Hill Metropolitan Activity Centre4

3.0 Box Hill Transport and Retail Precinct—Issues and Opportunities7

4.0 Amendment C175—Approach to Built Form Controls13

5.0 Amendment C175—Proposed Built Form Pattern16

6.0 Amendment C175—Detailed Built Form and Design Controls20

7.0 Conclusions and Recommendations.....21

Appendix A: Summary of Evidence & Personal Details22

1.0 Introduction

- [1] I am a Principal of town planning and urban design consultants David Lock Associates (Australia) Pty Ltd. I hold qualifications in architecture and urban design. I have over twenty-five years' professional experience and have practised exclusively in the field of urban design since 1993. Further details of my qualifications and experience are outlined in Appendix A.
- [2] In April 2017, I was instructed by Norton Rose Fulbright on behalf of Vicinity Limited to provide an independent urban design assessment of Whitehorse Amendment C175 as it relates to the land identified in the Panel version of proposed DDO6 as Box Hill Central North and Box Hill Central South. This comprises two separate shopping centres, one generally north of the rail line and west of Market Street (which I shall refer to as 'Central North'), and one south of Main Street and incorporating Box Hill Station and bus interchange (which I shall refer to as 'Central South').
- [3] My professional involvement in this activity centre began when I provided assistance in the formulation of the Box Hill Urban Design Framework (2002), which is referenced in the Box Hill Structure Plan (2007).

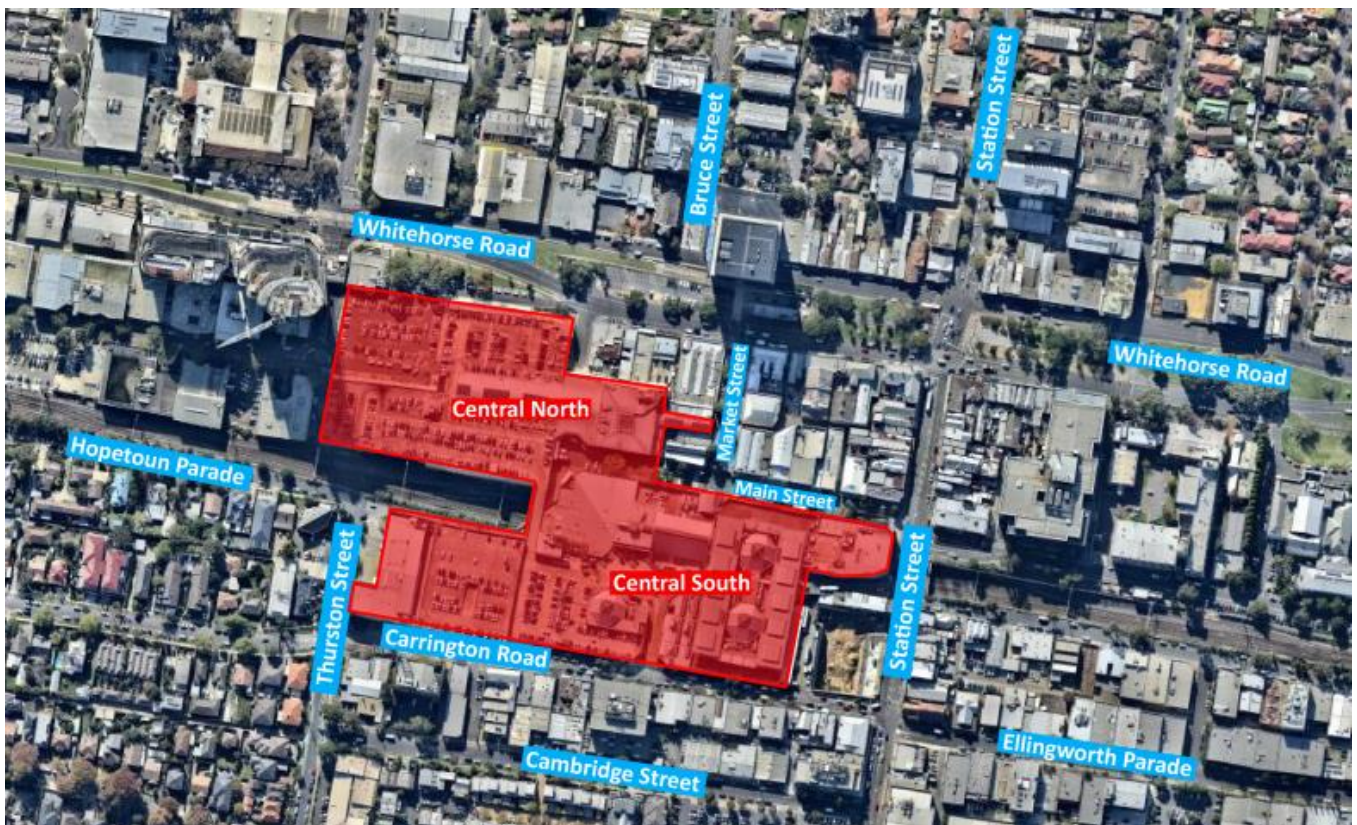


Figure 1 - Aerial map of Box Hill Central (in red)

[4] I have given urban design advice on numerous development proposals within the Box Hill Major Activity Centre (MAC). However, I have not previously provided advice in relation to Box Hill Central. Further details of the development proposals I have provided advice on are outlined in Appendix A.

[5] I have organised my assessment of the Amendment within this statement under the following headings:

- Section 2.0 – The Role of the Box Hill Metropolitan Activity Centre
- Section 3.0 – The Box Hill Transport and Retail Precinct—Issues and Opportunities
- Section 4.0 – Amendment C175—Approach to Built Form Controls
- Section 5.0 – Amendment C175—Proposed Built Form Pattern
- Section 6.0 – Amendment C175—Detailed Built Form and Design Controls
- Section 7.0 – Conclusions and Recommendations

2.0 The Role of the Box Hill Metropolitan Activity Centre

- [6] Strategic policy for the Box Hill Activity Centre is set at a State level through Plan Melbourne and the State Planning Policy Framework (SPPF), and at a local level through the Municipal Strategic Statement (MSS) of the Whitehorse Planning Scheme, supported by more detailed local policy.
- [7] Plan Melbourne identifies Box Hill as a Metropolitan Activity Centre (MAC)—one of only 11 in Melbourne (including two future MACs).

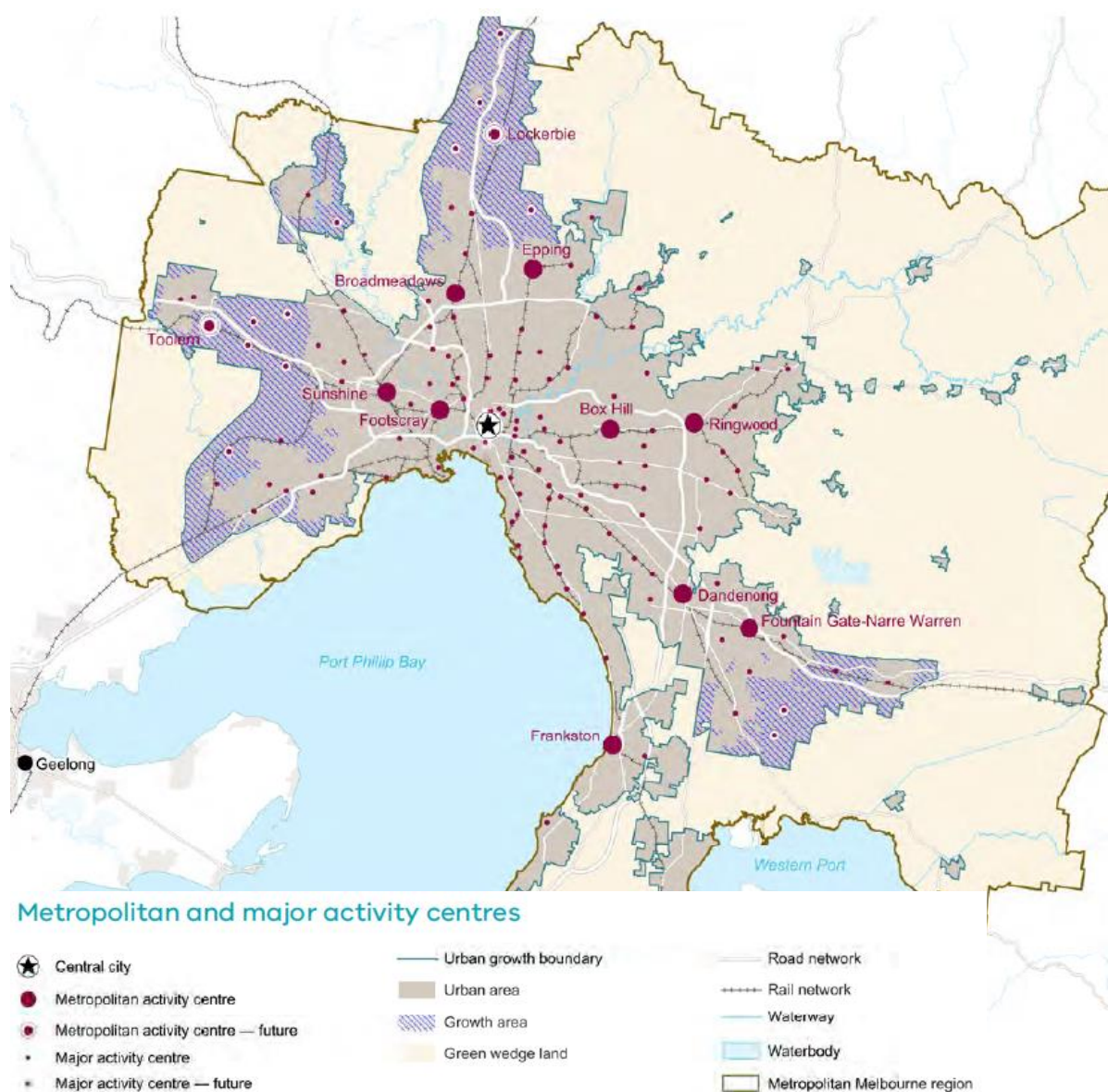


Figure 2 - Map showing the Metropolitan Activity Centres through Metropolitan Melbourne (source: Plan Melbourne – Map 14)

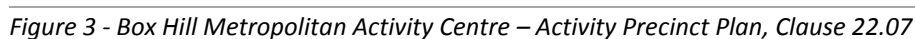
- [8] Plan Melbourne directs MACs to provide a diverse range of employment, activities and housing, and play a major service delivery role (including government, health, justice, education, retail and commercial services). It identifies MACs as critical to growth across a regional catchment, giving communities good access to a range of major retail, community government, entertainment, cultural and transport services. Box Hill serves a catchment covering many suburbs within the surrounding eastern metropolitan region.
- [9] Plan Melbourne also identifies that there are opportunities for more medium and higher density development in areas near existing railway stations, supporting transit-oriented development.
- [10] Plan Melbourne directs plans for MACs to accommodate significant growth and infrastructure. Within the SPPF, there is extensive policy supporting the continued growth and diversification of Metropolitan Activity Centres to give communities access to a wide range of goods and services, provide local employment and support the local economy (see Clauses 11.01-1, 11.06-1 and 17.01-1).
- [11] The MSS recognises that the Box Hill MAC plays an important major service delivery role for the subregional catchment area and as a major regional transport interchange, and identifies the need to further develop, support and reinforce the role and the growth of the MAC (see Clauses 21.01, 21.07 and 22.07-2). In particular, Clause 21.07-3 contains an objective *"To develop the Box Hill Metropolitan Activity Centre as the major focus for retail, commercial, health, transport, education and entertainment facilities in Melbourne's east."*
- [12] Clause 21.07-1 states *"It is essential that the Box Hill MAC develops as a major regional activity centre through the development of appropriate retail and office activities. It is also vital that the centre develops more residential and entertainment facilities to strengthen this role."* Clause 21.07-4 contains a strategy to *"Direct large entertainment, comparison or convenience retail uses serving a regional catchment into the Box Hill Metropolitan Activity Centre and Activity centres."*
- [13] Clause 22.07 provides local policy for the Box Hill Metropolitan Activity Centre. It contains objectives *"To ensure that the Box Hill Metropolitan Activity Centre can continue to expand in line with market demand."* and *"To ensure that future development within the Box Hill Metropolitan Activity Centre seeks to maximise employment growth for Whitehorse."* Policy reinforces these objectives. It also encourages use and development that:

Fills strategic gaps in the local retail offer while being appropriate to a Metropolitan Activity Centre.

Creates more and diverse opportunities for housing.

- [14] The growth of retail, health and education facilities within the core of the Activity Centre, along with the emerging character of high density office and apartment developments, reflects the metropolitan role of the Box Hill Activity Centre.
- [15] In summary, State and local policy clearly directs the continued growth and diversification of the Box Hill Activity Centre to serve the eastern metropolitan region. This includes growth in retail and commercial floorspace, health and education facilities, and housing.

^[16] Clause 22.07 defines the core of the Activity Centre as the Box Hill Transport and Retail Precinct (Precinct A).



[17] Box Hill Central falls within this precinct.

[18] The Box Hill Transit City Activity Centre Structure Plan (2007) is proposed to remain as a reference document. It continues to provide the only strategic basis for planning controls in the activity centre, despite now being 10 years old and the pace of change within the activity centre over that period.

[19] The Structure Plan identifies “*a need to improve access to public transport facilities ... The bus interchange is difficult to navigate and presents an unattractive waiting environment. Bus access arrangements into and out of the bus station delays both buses and general traffic and would benefit from bus priority measures.*” It goes on to say:

The Box Hill train and bus stations allow for modal interchanges but the facilities are inconvenient. The railway station is in the Centro shopping centre’s basement and the bus interchange is on its upper floor, with access to both exclusively via shopping centre elevators, ramps and lifts. The route between the two stations through the retail area is difficult to identify and indirect. Both stations offer poor environments for travellers. External platforms are poorly lit, isolated and uninviting. The bus interchange is difficult to navigate and an unattractive waiting environment, with limited access for disabled passengers. The stations are perceived to be unsafe despite the presence of surveillance cameras. There are also operational issues associated with the bus deck, with poor turning movements and safety problems associated with private vehicles accessing the deck and people crossing from bus waiting areas to the lifts and centre’s facilities.

Pedestrian access between buses and trains needs improvement. The bus interchange needs to be improved to provide full DDA compliance including access to the lift. Interchanges between all transport modes, including taxis, walking and cycling should be easy and inviting. Access to the interchange should be linked to, but not confused with, access to the shopping centre. The Box Hill Transport Interchange Study recommends a significant upgrade of the bus interchange and relocation of the train station entrance directly beneath the bus deck to support more convenient interchanges and better access to both stations from external areas (refer plan below for recommendations) It also identifies opportunities to create a better retail environment.

[20] The Box Hill Transport Interchange concept design (2002) recommended a significant upgrade to the bus interchange. This has not occurred yet.



Figure 4 - Illegible connection to train station



Figure 5 - Illegible connection to bus interchange



Figure 6 - Poor amenity in bus interchange

[21] The Structure Plan also identifies a need to improve ground level pedestrian connections through the Transport and Retail Precinct, noting variously:

North-south pedestrian routes are inhibited by the railway.

Connections between major pedestrian attractors in the Activity Centre are poor.

Pedestrian access between Market Street and Carrington Road through Centro Box Hill is inconvenient and confusing.

Access to the bus station for disabled passengers is limited.



Figure 7 – Illegible pedestrian connection through Box Hill Central

- [22] The Structure Plan identifies Box Hill Central as the opportunity to address the lack of pedestrian connectivity. In particular, it seeks a pedestrian link through Box Hill Central extending Market Street to Carrington Road. It notes:

Box Hill's retail core is relatively impermeable and illegible for pedestrian access. The Centro shopping centres cover a large area without public links through them. Their interior routes are not part of the public realm, are indirect and disorienting. These will remain under the control and management of the property owner, Centro, but further improvements (such as the recently completed Centro Whitehorse) would be valuable in providing more direct north-south routes from Carrington Road to Box Hill Gardens, and east-west access from Prospect Street to Station Street, and would be especially valuable in improving access to the rail and bus stations.

- [23] The Structure Plan identifies the potential for new private development, particularly on Vicinity's sites, to improve pedestrian connectivity. It states:

... private development can have an important role in contributing to better public access networks including access to public transport modes and stops. There is potential to reorganise the

interior of the shopping centre and railway station concourse to provide a more direct link through the centre. There is also potential for air rights development over the railways east and west of the shopping centre, which could contribute to links in those areas.

- [24] The Structure Plan identifies “*significantly increased land use densities close to the railway station ...*” as a desired outcome in this precinct.
- [25] The Victorian Government has established a Ministerial Advisory Group (MAG) to provide recommendations to the Minister for Public Transport on options for the Box Hill public transport interchange, in order to:
- produce a clear direction for the future of the Box Hill Interchange
 - improve and link public transport
 - explore the potential of commercial development and job creation for the local area.
- [26] The existing Clause 21.07-3 contains an objective “*To facilitate the redevelopment of key sites ...*”
- [27] The existing Clause 22.07-2 contains the following relevant objectives:
- To encourage significantly increased use of public transport and reduced rates in the use of private vehicular transport for travel to and from the Box Hill Activity Centre.*
- To ensure that development and use in the Box Hill Transport and Retail Precinct are appropriate to its role and function as a regional transport interchange for rail, bus, tram and taxi services.*
- [28] In summary, there are significant issues in the Transport and Retail Precinct in relation to the efficiency, convenience, legibility, amenity and safety of the public transport interchange, and the permeability and legibility of pedestrian connectivity more generally. The Structure Plan recommends a significant upgrade, and the Victorian Government has established an Advisory Group to investigate the public transport interchange issues. The Structure Plan identifies development of Vicinity’s site as key to addressing these issues, and identifies a significant increase in density near the station as a desired outcome. This is reinforced by the existing Clause 21.07’s encouragement for the redevelopment of key sites.

4.0 Amendment C175—Approach to Built Form Controls

- [29] The primary built form component of Amendment C175 is proposed DDO6. DDO6 ‘fleshes out’ the broad built form policy already contained within Clause 22.07, which is based on the Structure Plan. It divides the Built Form Precincts in Clause 22.07 into a series of sub-precincts, for which it provides a range of detailed built form controls, including preferred maximum heights, street walls heights and upper level setbacks.
- [30] The exhibited DDO6 shows Central North within Sub-Precinct F4 and Central South within Sub-Precinct F2. More recently, Council’s representative has provided tracked changes to the exhibited DDO6 that Council supports, which shows both Central North and Central South within Sub-Precinct F2 and both are marked as ‘strategic development sites.’
- [31] Sub-Precinct F2 is broader than the Vicinity land, also including land along Station Street to the south and the Council-owned car park on the south side of Cambridge Street. This is curious, as the other properties in this sub-precinct share very little in common with Vicinity’s land. They are much smaller properties (see Box Hill Metropolitan Activity Centre Built Form Guidelines Figure 5), and more distant from the train station and bus interchange.
- [32] Interestingly, the Council-owned car park south of Cambridge Street is subject to a separate design brief (because it is part of an ongoing disposal process). However, despite being critical to addressing the public transport and pedestrian connectivity issues summarised in section 3, and identified as the only ‘strategic development site’ within the activity centre, the Vicinity land is not afforded the same treatment. Instead, it shares built form provisions with modest infill sites, which are unable to make any substantive contribution to the broader functioning and amenity of the activity centre.
- [33] In relation to Sub-Precinct F2, the exhibited version of DDO6 stated that *“A plot – ratio approach to support greater development scale is applicable on Strategic Development Sites (to be determined) subject to positive contribution to its local context.”* This was presumably a reflection of the statement within the Box Hill Metropolitan Activity Centre Built Form Guidelines (‘the Guidelines’) that *“The City of Whitehorse seeks to explore options to encourage development outcomes which deliver local net community benefits negotiated between Council, prospective developers and community representatives”* (page 12).

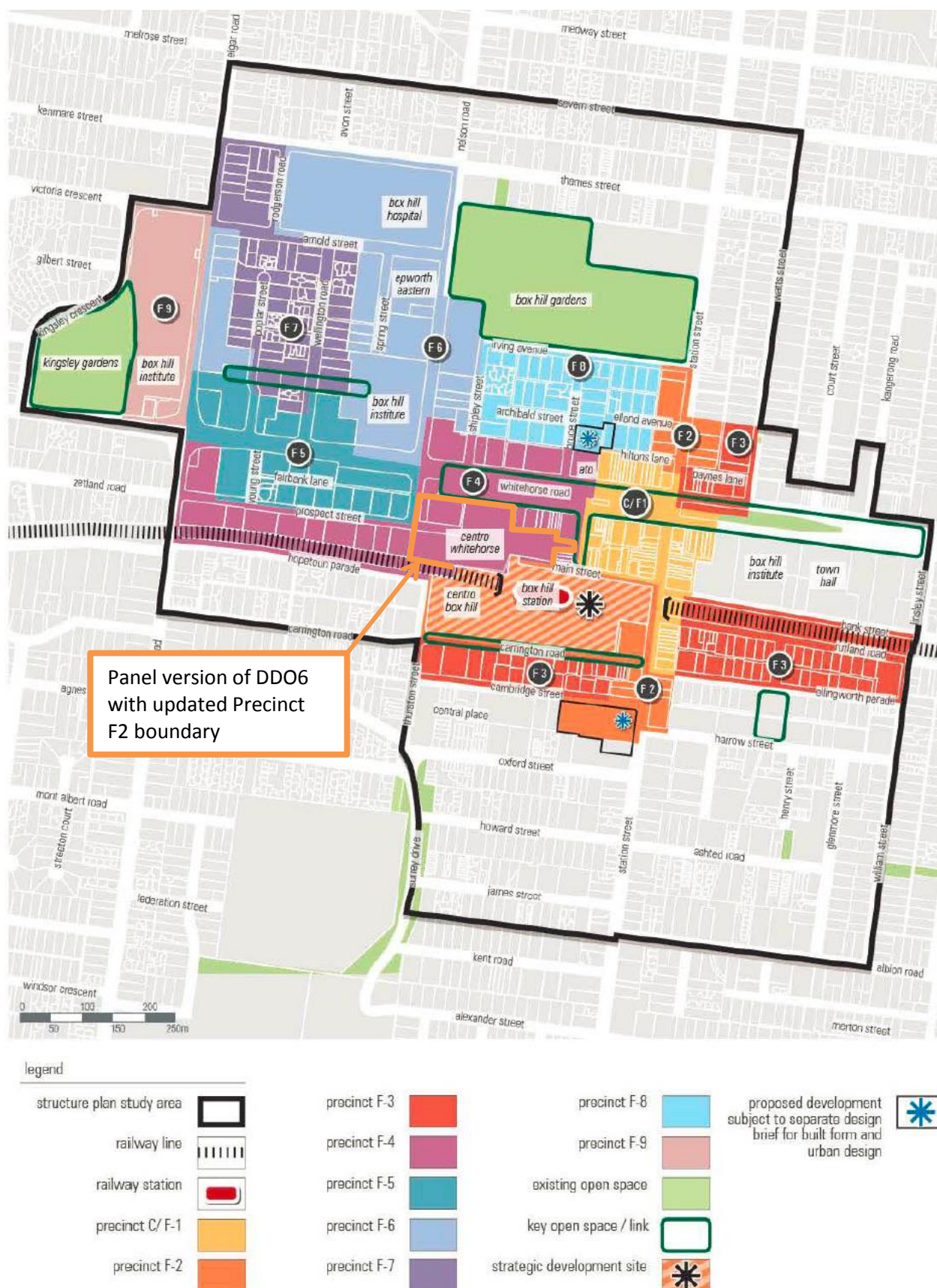


Figure 8 - Proposed DDO6 Map 2 Sub-precinct boundaries

- [34] Given that Central South was the only nominated strategic development site, the reference to a 'plot - ratio approach' seems to be an acknowledgement that it carries the potential for a greater contribution than is possible within the proposed built form parameters, but that the work has not been done to define that potential. If that is the case, why was it not unambiguously nominated for a separate design brief exercise, in the same vein as the Council car park site (rather than only if it seeks to exceed 12 storeys, like any other property in this sub-precinct)? Notably, the plot ratio approach is not further elaborated within the proposed DDO or the supporting Built Form Guidelines, which makes it of little utility in guiding applicants or planning authorities. It has now been deleted from the Panel version of the DDO.
- [35] I consider that the critical importance of the Central South site in addressing major concerns in relation to public transport and pedestrian connectivity at the heart of the activity centre, combined with the acknowledgement by the Structure Plan that the key to addressing these concerns is redevelopment of the land, warrant a site-specific master planning approach that integrates considerations of land use, transport, built form and open space, rather than the generic and limited nature of the proposed controls for this land.
- [36] Notably, the Guidelines, which underpins the proposed DDO, states that it is a 'high level' document and further 'fine grain' analysis is needed to identify requirements for infrastructure and public realm improvements. This reinforces the inadequacy of the strategic basis of the Amendment in developing appropriate controls for this site.
- [37] I note, too, that the Central North site is substantially larger than any other properties within Sub-Precinct F2. In addition, the Guidelines identify a proposed pedestrian link between Nelson Road and Hopetoun Parade across the southwest corner of this site. While Central North is not as critical to the rectification of public transport and pedestrian connectivity issues as Central South, its size offers the opportunity for significant public benefits that should also be recognised through a site-specific master planning approach, rather than the generic approach adopted in the DDO.

5.0 Amendment C175—Proposed Built Form Pattern

[38] Proposed DDO6 establishes a preferred built form pattern for the activity centre, as shown below:

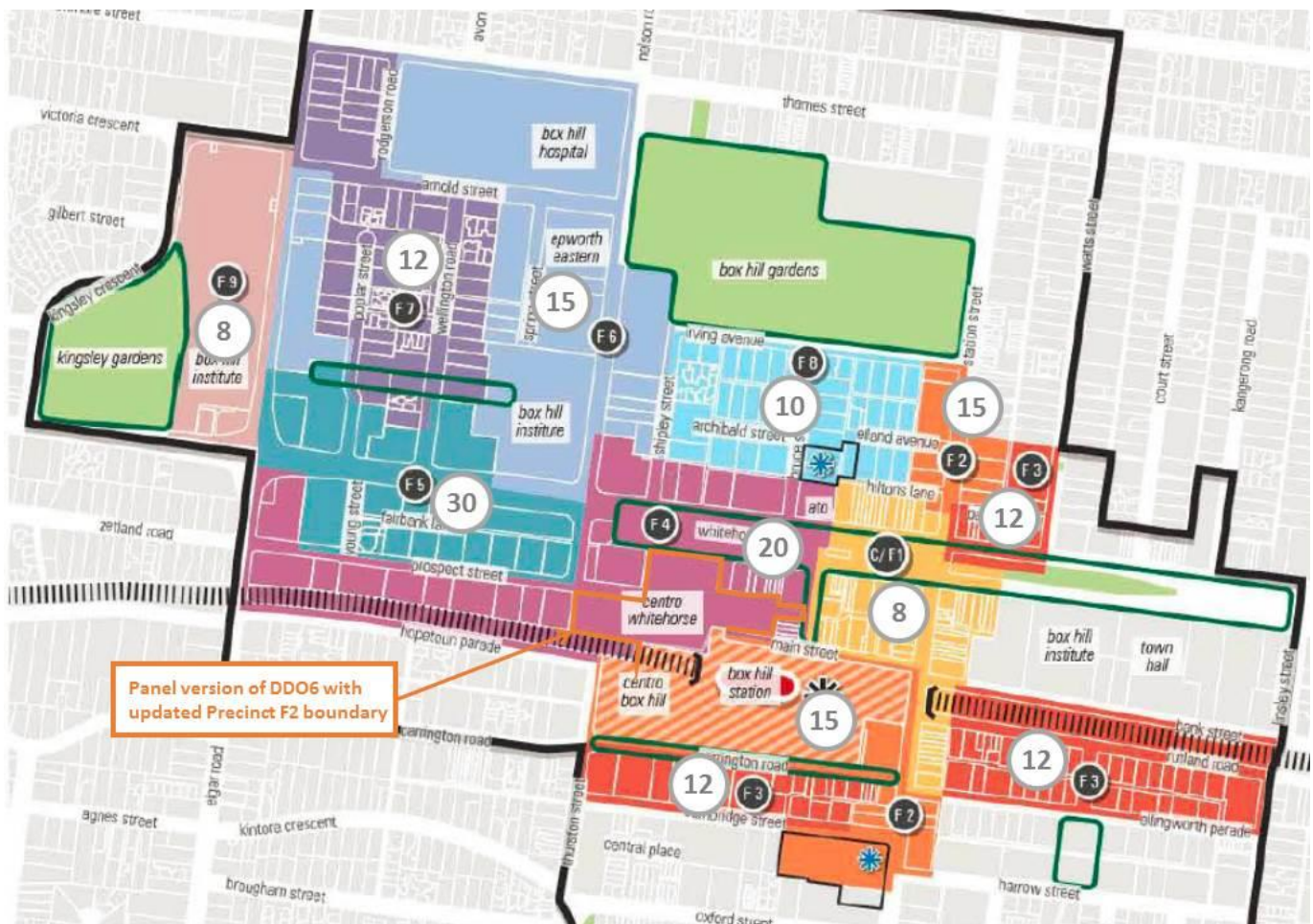


Figure 9 - Proposed DDO6 – preferred maximum heights (storeys)

[39] In broad terms, the tallest buildings are proposed along Whitehorse Road between Elgar Road and Nelson Road (Sub-Precinct F5), with the maximum heights stepping down from there in all directions. The lowest preferred maximum heights are generally at the edges of the centre. The exception to this is Sub-Precinct C/F1, which is limited to 8 storeys despite being at the heart of the centre. In principle, this is generally consistent with the Structure Plan and existing Clause 22.07, which seek to limit building height between Whitehorse Road, Market Street, Main Street and Station Street (the 'Traditional Town Centre') to respect the existing built form character and heritage values (although they seek to limit height to 3 storeys).

- [40] The concept of heights stepping down at the edges of the centre is consistent with the Structure Plan. However, the location of the 'peak' on Whitehorse Road west of Nelson Road with a significant stepping down towards the Station is at odds with the Structure Plan's aim for *"significantly increased land use densities close to the railway station, and in the area between the station, hospitals and the TAFE."* It is also inconsistent with the principle of transit-oriented development, enshrined in the SPPF (e.g. at Clauses 11.06-3 and 16.01) and identified in the Guidelines as a Precinct Objective for Sub-Precinct F2 (specifically in relation to the Vicinity land).
- [41] The Guidelines are the basis for the proposed DDO. Their stated purpose (other than to provide clarity and consistency) is *"to foster distinctive characteristics which are emerging from recent redevelopment and investment (particularly within Precinct F) and to reflect aspirations for the future"*, and *"to enhance the quality of the public realm"* (page 11).
- [42] The Guidelines identify 'Built Form Implications' of its context analysis (see pages 19 and 21). These include:
- In general, scales of developments could typically be categorised into small, medium and large based on its allotment attributes (size & width) and its locality in relation to Whitehorse Road.*
- Larger lots are often more able to accommodate changing built form as the off-site impacts can be minimised and managed.*
- [43] The Guidelines suggest a further 'Built Form Implication' of its contextual analysis is *"An urban form proposition could further emphasize the natural terrain and topography"* (page 25). They state that *"It is a primary objective of the Design Guidelines to retain and enhance the existing topography on the site."* This is further reinforced by the fourth 'Urban Form Proposition Key Directions' on page 27. The Guidelines identify that *"The tallest point within the Study Area is located in and around Box Hill Centro and Carrington Road."*
- [44] Given the very large size of Vicinity's sites, their position at the top of the hill and their location literally on top of or adjacent to the train station, it is difficult to understand how the Guidelines' analysis leads to a preferred maximum height that is only half that for Sub-Precinct F5. Interestingly, Sub-Precinct F5 is where most of the tallest buildings are that have been built or approved to date (the exception being Sky ONE Box Hill at 545 Station Street, which is 36 storeys high and sits in Sub-Precinct F2). This may be a clue to the lesser height proposed for the Vicinity land, which happens not to have been the subject of development proposals for high-

rise buildings to date. This suggestion is reinforced by the following 'Built Form Implication':

Understanding the existing and emerging development patterns gives an indication of the likely future built form outcome.

- [45] It is also reinforced by the diagrammatic cross-section along Station Street at page 27 of the Guidelines, which indicates a low built form on the Box Hill Central site.
- [46] Whilst the breadth and centrality of Whitehorse Road are undoubtedly attributes that suit taller buildings, it is difficult to understand why substantially lower preferred maximum heights are thought necessary on Vicinity's very large landholding, at the topographic high point of the activity centre, and with the best possible public transport accessibility and centrality to the activity centre. In my view, the Guidelines' purpose to create distinctive sub-precinct characters is not a sufficient justification to limit the potential height of development on Vicinity's land, given its excellent attributes for more intensive development.
- [47] The DDO contains a requirement that "*Buildings should not cast additional overshadow on key open spaces and plazas between 11.00-14.00 on 22 June*". Carrington Street is identified on Map 2 as a 'key open space / link'. It is unclear whether it is a 'key open space' for the purpose of the overshadowing control.
- [48] If it is intended that solar access to Carrington Street at the winter solstice is to be protected, then the implications of this requirement need to be understood. Even a single-storey building will overshadow the northern footpath of Carrington Street at the winter solstice. If winter sun to the southern footpath is to be protected, building height on the Central South site would be limited to approximately 6.5m at the Carrington Street frontage and approximately 40m in the middle of the site. Given that the DDO contemplates a 'base definition' of 5 storeys and a street wall height of 10 storeys in this sub-precinct, I query whether this overshadowing requirement is intended to be applied to Carrington Street.



Figure 10 - Carrington Street on 5 June 2017 (approximately 4pm)

- [49] In summary, the built form pattern promoted by the Amendment—in particular, the way in which it steps down in height towards the train station—is not supported by State planning policy, the Structure Plan or even the analysis and objectives contained within the Guidelines. Further, the application of the winter solstice overshadowing requirement to Carrington Street is ambiguous and, if it is intended to apply, inappropriately constraining.

6.0 Amendment C175—Detailed Built Form and Design Controls

^[50] There are a number of detailed provisions within the proposed DDO that are questionable, as follows:

- The ‘Building Depths’ and ‘Landscaping’ requirements overlap with the new provisions of Clause 58 (Better Apartment Design Standards), and are generic, rather than place-specific considerations.
- The ‘base definition’ and ‘street wall’ requirements depicted in Figure 2 are confusing, particularly as the ‘base definition’ is not defined in Table 4 or elsewhere within the DDO schedule.
- Proposed 21.07-4 contains a strategy to *“Encourage new development within the Box Hill MAC to have regard to the principles of the Box Hill Metropolitan Activity Centre Built Form Guidelines 2016.”* Similarly, proposed 22.07-3 contains policy *“that use and development of land is consistent with ... the principles of the Box Hill Metropolitan Activity Centre Built Form Guidelines (2016).”* And later that *“New use and development should have regard to ... the Box Hill Metropolitan Activity Centre Built Form Guidelines (2016).”* However, the Guidelines are only proposed to be a reference document. Therefore, if the principles are considered sufficiently important that they warrant specific reference in the LPPF, then they should be included within the planning scheme. Otherwise, reference to them should be deleted.

7.0 Conclusions and Recommendations

- [51] In conclusion, I do not consider that Amendment C175 has a sound strategic basis as it relates to Vicinity's land. The generic nature of the proposed controls, limited to built form and building design considerations, does not reflect the need for integrated master planning of Box Hill Central to facilitate major public transport and pedestrian connectivity improvements. Further, the proposed maximum height control would unnecessarily reduce the land's development potential, which will limit the opportunity to address public transport and pedestrian connectivity issues.
- [52] Further, the way in which the proposed built form pattern peaks on Whitehorse Road west of Nelson Road and steps down towards the train station does not reflect:
- the clear State and local policy directing growth to Metropolitan Activity Centres;
 - the promotion of transit-oriented development within State policy and the Structure Plan; and
 - the Guidelines' analysis and objectives which support greater heights on larger sites and the topographic high point.
- [53] Therefore, I recommend removing Vicinity's land from the Amendment. Alternatively, it could be identified as a separate precinct, and provisions specifically applying to it limited to sub-precinct objectives and a Built Form Response seeking the preparation of a design brief to guide any major buildings or works.
- [54] If the proposed provisions relating to the Vicinity's land are to be retained, I consider that the winter solstice overshadowing requirement applying to Carrington Street should be deleted.
- [55] In addition, I consider that:
- The 'Building Depths' and 'Landscaping' requirements should be deleted.
 - The 'base definition' and 'street wall' requirements should be clarified.
 - References to development having regard to the principles of the Guidelines should be deleted, or the principles included within the planning scheme.

Appendix A: Summary of Evidence & Personal Details

Name and Address

Mark Peter Sheppard
Principal
David Lock Associates (Australia) Pty Ltd
2/166 Albert Road
SOUTH MELBOURNE VIC 3205

Qualifications

- Recognised Urban Design Practitioner (Urban Design Group, UK), 2014
- Corporate Member of the Planning Institute of Australia, 2008
- MA Urban Design, Oxford Brookes University, UK, 1992
- Diploma Urban Design, Oxford Brookes University, UK, 1992
- Bachelor of Architecture, University of Auckland, NZ, 1990

Professional experience

- Director, David Lock Associates (Australia), 1997 to present
- Urban Designer - Associate, David Lock Associates, UK, 1993 – 1997
- Architectural Assistant, Sipson Gray Associates, London, UK, 1990 – 1993
- Architectural Assistant, Kirkcaldy Associates, Auckland, NZ, 1988 – 1990

Area of Expertise

I have over twenty years' experience in private practice with various architecture and urban design consultancies in New Zealand, England and Australia, and have practised exclusively in the field of urban design since 1993. I am the author of '*Essentials of Urban Design*' (CSIRO, 2015).

Expertise to prepare this report

I have been involved in the design and assessment of numerous activity centre and urban infill projects in Victoria. These have included:

- Structure Plans for Montague, Preston Central (2007 National PIA Urban Planning Award), Highpoint, Forrest Hill, Wheelers Hill and three urban villages in Moreland;
- Urban Design Frameworks for Darebin High Street (2004 National PIA Urban Design Award), Highpoint, Central Dandenong, South Melbourne, Carlisle Street Balaclava, St Albans and Footscray;

- Built form controls for the Brunswick Major Activity Centre, Port Melbourne and Ormond Road, Elwood;
- Numerous independent urban design assessments of development proposals to inform panel and VCAT hearings; and
- Urban design advice in relation to development proposals for the following sites in the Box Hill Activity Centre:
 - 702-706 Station Street, Box Hill;
 - 820 Whitehorse Rd, Box Hill;
 - 845-851 Whitehorse Rd, Box Hill;
 - 850 Whitehorse Rd, Box Hill;
 - 874-878 Whitehorse Road, Box Hill;
 - 997-1003 Whitehorse Rd, Box Hill;
 - 1 Wellington Rd, Box Hill;
 - 19 Wellington Rd, Box Hill;
 - 16-22 Wellington Rd, Box Hill;
 - 17-19 Arnold St, Box Hill;
 - 9 Prospect St, Box Hill;
 - 13 Prospect St, Box Hill;
 - 31-35 Prospect St, Box Hill;
 - 17 Poplar St, Box Hill;
 - 19-21 Poplar St, Box Hill;
 - 5-7 Irving Ave, Box Hill;
 - 15-17 Irving Ave, Box Hill;
 - 21-23 Irving Ave, Box Hill;
 - 9-11 Bruce St, Box Hill;
 - 6 Archibald St, Box Hill;
 - 1 Elland Ave, Box Hill;
 - 2-4 Elland Ave, Box Hill;

- 712-714 Station St, Box Hill;
- 517-521 Station St, Box Hill;
- 9-11 Ellingworth Parade, Box Hill;
- 41 Ellingworth Parade, Box Hill;
- 54 Rutland Rd, Box Hill.

Other significant contributors

I was assisted in the preparation of this report by Vincent Pham (Planner of David Lock Associates).

Instructions which define the scope of this report

I have been requested to give expert evidence in relation to urban design aspects of the proposed planning provisions.

I am engaged by Vicinity Limited and have received written instructions from Norton Rose Fulbright including various documents relating to the proposal.

Facts, matters and assumptions relied upon

- Inspection of the subject site and surrounding area; and
- Review of planning controls and policies affecting the area.

Documents taken into account

- Whitehorse Planning Scheme Amendment C175 documentation;
- Panel version of the proposed DDO6;
- The Whitehorse Planning Scheme and Reference documents;
- Various correspondences relating to the proposed amendment.

Summary of opinions

Refer to the conclusion of this statement (Section 7).

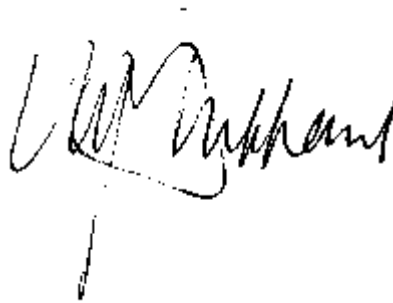
Provisional Opinions

There are no provisional opinions in this report.

Questions outside my area of expertise, incomplete or inaccurate aspects of the report

This report is complete and accurate to the best of my knowledge.

I have made all the inquiries that I believe are desirable and appropriate and confirm that no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

A handwritten signature in black ink, appearing to read 'Mark Sheppard', with a vertical line extending downwards from the bottom of the signature.

Mark Sheppard

