

CROWAG Submission.

Blackburn, Nunawading and Mitcham Activity Centres.

30th November 2025



Figure 1. Vegetation Patterns (Red) Blackburn and Nunawading.

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Figure 2. On the Activity Centre chopping block - National Trust Heritage area.

CROWAG's Position.

CROWAG supports development in appropriate areas based on evidence and strategic studies.

We accept that the strategy that City of Whitehorse has been following will meet the increased population, anticipated by the Transport and Planning department without the proposed Activity centres.

We support and endorse Whitehorse council's recommendation to excise the SLO1, SL02, SL03 and SL04 areas from the current HCTZ boundaries.

We also note that:

- The current zoning (RGZ and GRZ) near Blackburn, Nunawading and Mitcham provide significant scope for developers to construct higher density developments.
- There are a large number of approved developments in Whitehorse that remain unbuilt,
- Developers land bank and hold back on approved developments seeking extensions of time while awaiting more favourable profits.
- A large number of dwellings remain vacant while we have a housing crisis.
- That stamp duty, capital gains tax and negative gearing negatively skew housing affordability and availability.
- Strategies for increased social housing are absent in the Activity Centre proposal.
- That there is no clear strategy for addressing the additional infrastructure requirements for the population increase expected in Activity Centres – Water, sewer, storm water, electricity, residential and commuter parking, traffic, bus services, and active transport.
- That poor construction standards and expensive but dubious body corporate practices make apartments less attractive as a housing choice.
- The proposed Activity Centre zone Amendments undermine community confidence in the democratic process by neutering the role of the elected local council and remove third party rights.
- It makes no sense to sponsor the removal of high value canopy tree cover from about half a square kilometre of Whitehorse that currently meets the state Plan for Victoria 30% tree canopy target, for the marginal benefit of additional high density housing when other areas with low canopy cover are more suited.

HCTZ's must avoid the inclusion of SLO's.

What **should not be** part of the Housing Choice and Transport Zone (HCTZ) are those rare and highly valued areas designated as Significant Landscape (SLO), Vegetation Protection (VPO) or Environmentally Significant Overlays (ESO). The few small patches of metropolitan Melbourne that still have high value vegetation often including remnant indigenous vegetation should have protection strengthened rather than diluted. Blackburn Lake and the Creeklands, for instance, contains some remnant Valley Heathy Forest, Ecological Vegetation Class (EVC) 127¹. SLO's 1 and SLO2 provide a buffer that provides protection. The SLO controls recognise the importance of vegetation and tree canopy on private land. Indigenous plants and canopy trees provide habitat for birds and other animals and are also areas of refuge and respite for birds traversing

¹ [Whitehorse Urban Biodiversity Strategy](#)

between parks and linear reserves. They also provide refuge and respite for residents and visitors.

The wilful or inadvertent inclusion into the HCTZ of SLO's in Blackburn, Nunawading and Mitcham must be reversed.

SLO's for small areas within the metropolitan area are rare. This is because development pressures since early settlement have removed most vegetation. Where SLO's do exist, they have a high community support and environmental value.

Of the 60 proposed Activity Centres across metropolitan Melbourne, Blackburn, Nunawading and Mitcham each have small SLO areas included within the proposed HCTZ. We are unaware of any other of the 60 Activity Centres that include SLO's, that elevates their importance.

- SLO's are the most highly valued areas of Whitehorse. The SLO areas being considered as HCTZ are less than 1% of the area of Whitehorse yet contain some of the most significant landscape and heritage assets.
- The areas of SLO's within the HCTZ boundary could be viewed as small and insignificant and therefore not worth keeping. However the opposite is the case, the small areas highlight the critical importance and why they need to be retained and enhanced. These areas are an oasis in a desert of grey roofs. The estimated areas of the affected SLO's - Mitcham .056sq km, Nunawading .05sq km and Blackburn .49sq km. total .596sq km less than 1% of 64.2 sq km for Whitehorse.

What demographic is served by High Density Activity Centres?

Higher density development in Activity Centres should allow for a mix of dwelling types. High rise apartments are typically 1- and 2-bedroom apartments, ideal for young couples or singles but not suitable for families and to not encourage downsizing. The dwelling type that should be encouraged more in activity centres are 3-bedroom apartments and townhouses. Big enough to age in place for a small family or attract a downsizing older couple who are still able to accommodate visitors, children and grandchildren.

Young couples will want something bigger when they have children but the likelihood of finding something within walking distance of the Activity Centre will be low due to the inflated land values that will result from rezoning to HCTZ. Being forced further from the activity centre will mean more reliance on cars to get around, working against the stated purpose.

What Are the Risks of the Activity Centre proposed?

The planning changes for HCTZ, while claiming to reach 30% canopy cover as The Plan for Victoria policy states, can never achieve more than 15%. From 10% canopy cover on blocks less than 1000sqm and 20% on block sizes larger than 1000sqm. The total achievable is less than 15%. Even if including council street trees which will be more compromised due to the greater demand on streets for parking, services, walking, cycling and traffic flow.

If zoned HCTZ there will be a loss of the vegetation and tree canopy in the impacted SLO's through more intensive development, reducing the canopy from 30% (the state target) to some diminished value. Canopy loss leads to the loss of habitat on already stressed wildlife in the urban area. Canopy loss removes the cooling effect of shade increasing urban heating and increased hard surface accelerates storm water runoff from the shorter duration high intensity storms that now occur.

The flow on effects on the environment include habitat loss, breaks to wildlife corridor linkages, additional stress on endangered species, changes in ground water infiltration and runoff impacting the vegetation down hill to Gardiners Creek.

What does the community value?

- The bushland amenity and feel of central Blackburn and the village scale of the Blackburn shops.
- Blackburn Lake Sanctuary, which is a large regional park, the largest bushland park in the City of Whitehorse at approximately 27 Ha.
- The linkages along the Creeklands (Gardiners creek liner corridor) and the interface with the adjoining SLO streets.
- Connection to the Gardiners Creek (KoyongKoot) and Yarra River rehabilitation programs
- National Trust recognition of landscape significance.
- A strong sense of community that has come from working to enhance and protect the natural landscape.
- Strong community organisations that continue to support and defend the existing amenity and controls built from many years of action and advocacy. Organisations such as Tree Society, BRAG, BVRG, CROWAG
- Strong historical connection to the Blackburn Model village and to the Mitcham Walker Estate that includes landscape and heritage values.
- A deep connection to Australian landscape through the Heidelberg School artists including Frederick McCubbin, a resident of Blackburn who painted a number of paintings set in the Blackburn landscape.
- A connection to The Fresh Air movement where children from the industrial inner-city suburbs came to Blackburn for fresh air and nature.

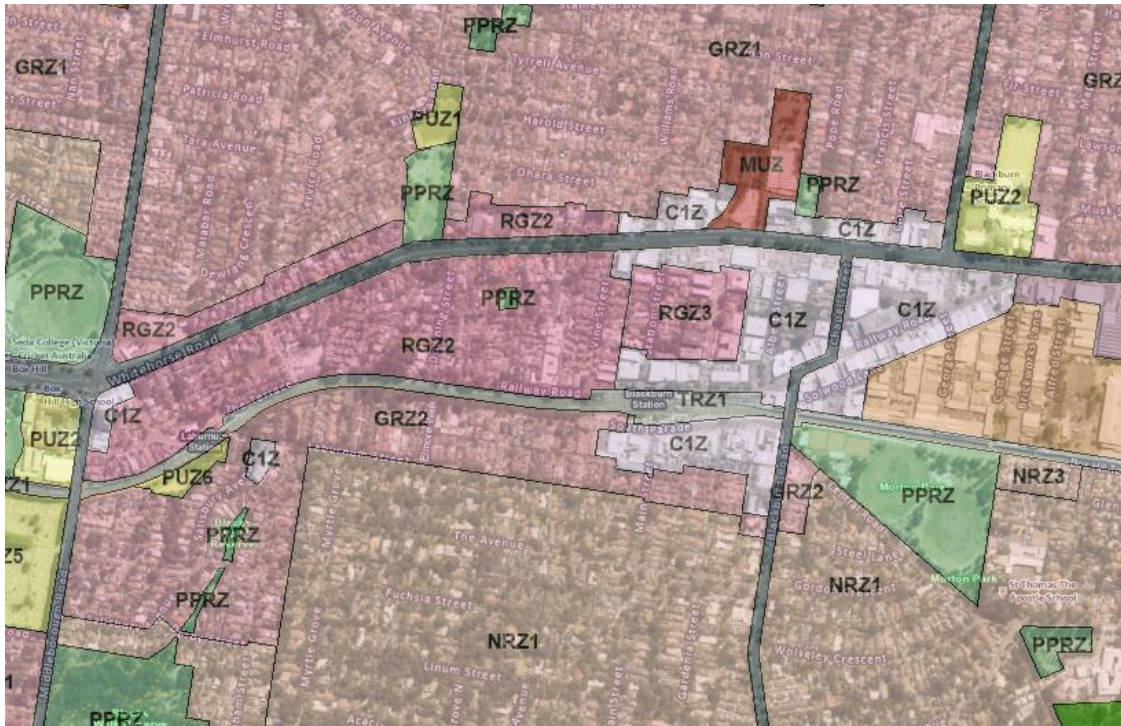


Figure 3. Existing zones showing GRZ and RGZ where higher density developments are already permitted.

What does the Whitehorse planning scheme say about SLO's and the Bush Environment Character Areas?

SLO1, 2, 3 and 4 are located in the Bush Environment character precinct.²

Built environment and heritage - (WPS 02.03-5)

'Retaining trees, and providing sufficient space for the regeneration of trees, is therefore vital to preserve and enhance the amenity and character of the City.'

Bush Environment Precinct strategies – (WPS 15.01-5L)

- *'Ensure that development within this precinct is limited, reinforcing the lowest scale of growth,*
- *where the integrity of the environment and the significant landscape is given the highest priority.'*

²

Built environment and heritage.

..... Trees are integral to the neighbourhood character of Whitehorse, and they have been identified as an important contributor to the Bush Environment, Bush Suburban and Garden Suburban character areas. The Municipal Wide Tree Study identified that "trees are the most significant determinant of the character of various areas within the City of Whitehorse, with upper tree canopy covering a significant proportion of the city" (Municipal Wide Tree Study Discussion Paper, March 2016)

.....

Neighbourhood character

There is concern within the community that poorly designed residential development is eroding the character and quality of some residential areas. As the basis for addressing this concern, the Whitehorse Neighbourhood Character Study, 2014 has categorised the City's residential areas into the following neighbourhood character types:

- Garden Suburban Area.
- Bush Suburban Area.
- Bush Environment.

Council will use the identified character types and the three categories of housing change identified in Clause 02.03-6 to encourage high-quality development that is responsive to site constraints and opportunities and contributes to the preferred neighbourhood character of the area.

Tree conservation

Council has identified trees as being an integral and valued aspect of the character of Whitehorse, particularly within many of its residential areas.

Vegetation has been identified as one of the most significant determinants of neighbourhood character in the municipality, with trees playing a crucial role. Council is concerned that the removal of canopy trees and vegetation will erode the neighbourhood character of Whitehorse. Of particular concern is the clearing of all trees from sites prior to development. Council's interim Urban Forest Strategy published in 2018, outlines the vision, policies and actions relating to Whitehorse's tree population and has set a target for canopy cover of at least 30% by 2030.

Retaining trees, and providing sufficient space for the regeneration of trees, is therefore vital to preserve and enhance the amenity and character of the City. It strengthens neighbourhood character, landscape and amenity, reduces the urban heat island effect, provides habitat for wildlife, improves air quality and the local climate and has positive effects on community health and wellbeing.

Preferred neighbourhood character

Policy application

This policy applies to applications for development in the Neighbourhood Residential, General Residential, Residential Growth, and Mixed-Use Zones, with reference to the precincts identified on the Neighbourhood Character Precincts Map forming part of this clause.

Objective

To ensure that development:

- Is consistent with the built form envisaged for the three categories of housing change, those being limited, natural and substantial change areas as defined in Clause 16.01-1L (Housing change) and shown on Plan 2: Housing Framework Plan at Clause 02.04.
- Contributes to the preferred neighbourhood character of the area.
- Minimises the loss of trees and vegetation.
- Does not detract from the natural environment and ecological systems.
- Provides adequate vegetation and gardens consistent with the preferred neighbourhood character.

Bush Environment Precinct strategies

- Ensure that development within this precinct is limited, reinforcing the lowest scale of growth,
- where the integrity of the environment and the significant landscape is given the highest priority.
- Design development that nestles into the topography of the landscape and is surrounded by bush-like native and indigenous gardens, including large indigenous trees in the private and public domain.
- Ensure streetscapes are dominated by vegetation so that buildings are subservient in the landscape and are frequently hidden from view.
- Ensure development and hard surfaces occupy a very low proportion of the site.
- Site development to reflect the prevailing front, rear and side setbacks.
- Provide substantial vegetation including large canopy trees in large rear setbacks.
- Leave front setbacks unfenced to enable bushy planting that is complemented by the street trees.
- Plant indigenous trees and shrubs for their contribution to wildlife corridors on properties abutting and close to creeks and lake environs.
- Provide for the development of 1 Lake Road, Blackburn, 131-173 Central Road, Nunawading and 57-67 Central Road, Blackburn for residential and institutional purposes through a site layout and built form which is subservient to the landscape character and contributes to the special environmental and landscape character of the Blackburn Lake surrounds.

SLO2 Nunawading

The location of the Nunawading SLO2 area included in the Nunawading HTCZ is adjacent to a habitat corridor near the head of Gardiners Creek running from east of Springvale Road to Blackburn Lake Sanctuary and beyond through Gardiners Creek linear parks, eventually to the Yarra River. Whitehorse Planning Scheme outcomes from this area must be consistent with the Planning Policy Framework of the Whitehorse Planning Scheme, and, in particular meet the clear outcomes of the Landscape and Character Objectives and Decision Guidelines of Significant Landscape Overlay Schedule 2 (SLO2) and meet the Neighbourhood Character and Tree Conservation sections included in Clause 02.03-5 (**Built environment and heritage**). This is further reinforced by the Bush Environment character statement that applies to SLO1,2,3 and 4. Supported by the Blackburn Lake Surrounds Study³

The Whitehorse Planning scheme clearly articulates the primacy of landscape outcomes to 'protect and enhance' sites in SLO1,2,3 and 4 so that they meet the preferred character objectives. Whitehorse Council aims to retain and enhance landscape character and canopy trees on private land through the planning scheme it also seeks to increase canopy cover across the municipality through its Urban Forest Strategy.

The high value SLO1 and SLO2 areas in Whitehorse are critical for the health of Gardiners Creek (KooyongKoot) at its source. There is a strong community desire to develop a management plan for the length of Gardiners Creek to its junction with the Yarra River. Development of a management plan is being coordinated by the KooyongKoot Alliance made up of 20 community entities and collaborating organisations. These include the 5 Councils through which Gardiners Creek runs as well as Melbourne Water, Yarra Valley Water, Yarra River Keepers, and others. The Alliance has been the recipient of significant federal and state grants for its revegetation programs. While supporting regeneration of the health of Gardiners Creek, it makes no sense for the state government to be at the same time, introducing planning changes that will degrade Gardiners Creek at Blackburn.

³ [Background to the Blackburn Lake Residential Area Special Planning Controls \(1997\)](#)



Figure 4. Suburban habitat linkages - Blackburn Creeklands.

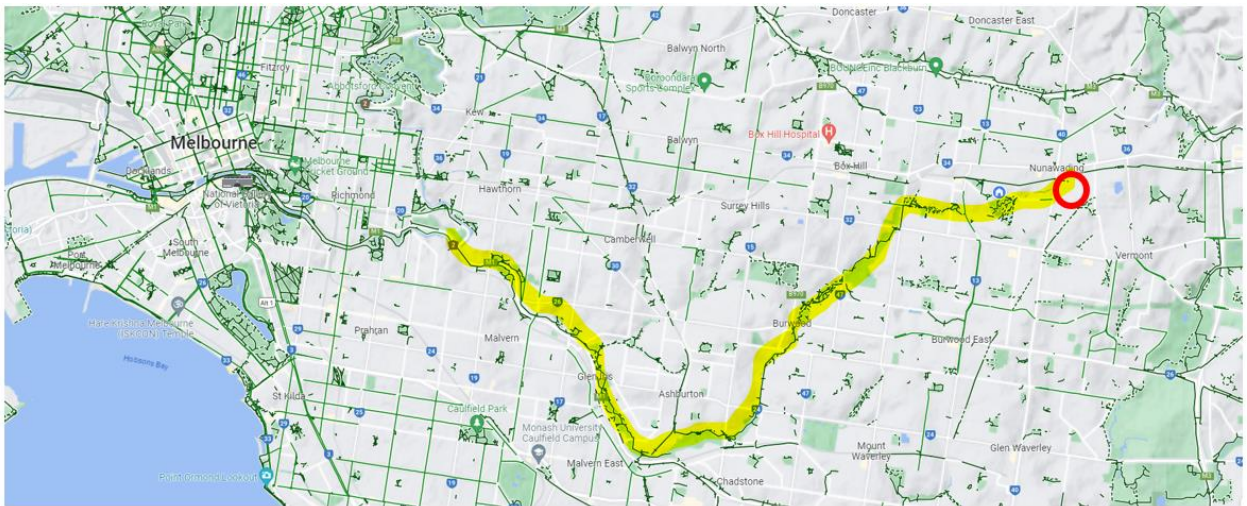


Figure 5. KooyongKoot Alliance seeking a management Plan for Gardiners Creek

What are the objectives of the SLO's that the community is so keen to see retained and strengthened?

SLO 1 and 2.

Landscape character objectives to be achieved for SLO's⁴ 1 and 2, (Our emphasis):

- To **retain the dominance of vegetation** cover in keeping with the bush character environment.
- To encourage the **retention and regeneration of native vegetation for the protection of wildlife habitat.**
- To ensure that a reasonable proportion of a lot is free of buildings **to provide for the planting of tall trees in a natural garden setting.**
- To encourage the development of **sympathetic buildings within an envelope, which ensures the maintenance of a tree-dominated landscape.**
- To ensure that **buildings and works retain an inconspicuous profile** and do not dominate the *landscape*.
- To ensure that development **is compatible with the character of the area.**

The only difference between SLO1 and SLO2 is in building footprint and retained pervious area. Triggers are:

SLO1 Footprint 25% and 15% upper level, impervious area 42% - 58% of site pervious.

SLO2 Footprint 33% and 25% upper level, impervious area 17% - 50% of site pervious.

SLO's 3 and 4 only vary slightly.

SLO3.

- To retain the dominance of vegetation cover in keeping with the garden character of the area.
- To ensure that a reasonable proportion of a lot is free of buildings to provide for the planting of tall trees in a natural garden setting, other landscaping and open space use.
- To encourage the development of sympathetic buildings within an envelope, which ensures the maintenance of a tree-dominated landscape.

⁴ [SLO1 Schedule](#), [SLO2 Schedule](#), [SLO3 Schedule](#), [SLO4 Schedule](#).

- To ensure that buildings and works retain an inconspicuous profile and do not dominate the landscape.
- To ensure that development is compatible with the character and built form of the area.
- To encourage the retention and regeneration of vegetation for the protection of wildlife habitat.
- To ensure that the distinctive avenues of street trees are protected and retained.

SLO4

- To retain and enhance the vegetation dominated vistas and streetscapes, through ensuring the dominance of native and exotic vegetation cover.
- To provide for the retention and planting of tall trees in a natural garden setting.
- To ensure front setbacks are well vegetated.
- To ensure that buildings and works retain an inconspicuous profile and do not dominate the landscape.
- To encourage the use of vegetation as an alternative to front fencing, and low to average height open style front fences.
- To ensure that development is compatible with the character of the area.

Risks of overlaying the SLO on a HCTZ.

If left within the HCTZ the integrity of the significant landscape objectives will be overtaken by incremental degradation. Each development that is permitted that erodes the landscape qualities makes it easier for the next developer to claim there is nothing significant to protect. Some developers are prepared to illegally remove protected trees and bear the penalty as a cost of doing business.

The pressure that is being applied by existing changes in the planning scheme is already incrementally eroding SLO objectives. Once approved the loss of tree canopy or adequate space for replanting cannot be reversed. That which was once high amenity high value significant landscape becomes standard suburban block without habitat or tree canopy value.

As an example, in his decision of the 20 June 2007 determination to ‘Kinvale Gardens Investments Pty Ltd v Whitehorse CC [2007] VCAT 1105’ for 6 dwellings on a site in SLO2 (190-192 Central Road, Nunawading), Member J A Bennett’s statement is as true today as it was then:

“21. Although it will be evident that my main concerns relate to the intensity of built form in a north/south direction, I suspect that what is required is a completely different philosophy to the design of buildings in this area of special significance. I am not convinced that simply replicating medium density development that can be found anywhere elsewhere in Melbourne really responds to the identified special character of

the Blackburn Lake area. Existing medium developments further along Central Road do not represent designs that have responded to the area and approvals that are more recent also appear to pay lip service to the special context of this locality. The SLO2 and local policy give a clear indication as to the relative importance of landscape and native vegetation when designing new development and encourages the development of sympathetic buildings to ensure maintenance of a tree-dominated landscape.”

A subsequent appeal to VCAT for 10x2 storey cookie cutter units was amended to 8 units for the VCAT hearing and was approved on 20 December 2023.

What changed from the 2007 VCAT appeal to the 2023 appeal?

The site had been moonscaped meaning that no significant vegetation remained on the site at time of appeal and the Housing Statement and VC243 was gazetted on 20 and 22 September 2023 that included a wide range of modifications to the Planning Scheme that included the codification of numerical development standards at Clause 55.

This example demonstrates that Significant Landscape Overlay controls cannot be relied on to achieve the planning outcomes expected of the Whitehorse Planning Scheme, particularly in a zone that seeks higher density and less space for canopy tree and landscape planting.

Why SLO's in Blackburn?

Because of concern over the effect of tree clearing on the indigenous bird population and on the visual cohesiveness of the special character of Blackburn's 'Bellbird' area in the 70's and 80's by inappropriate residential developments, a community sponsored planning amendment was initiated. The Amendment 280 resulted in Special Residential Zone (SRZ5) which was gazetted 8 June 1988 into the Nunawading Planning Scheme. The amendment provided for vegetation protection in a buffer area of 53 streets surrounding the 'National Trust' streets. The Bellbird Area streets had received a National Trust⁵ citation in 1976. This buffer area also supported the habitat linkages between residential areas and Blackburn Lake and various reserves, parks and creeks.

With the introduction of the Whitehorse Planning Scheme in 1999 under council amalgamations the SRZ5 was replaced by SLO2.

⁵ [National Trust Citation Bellbird area Blackburn](#)

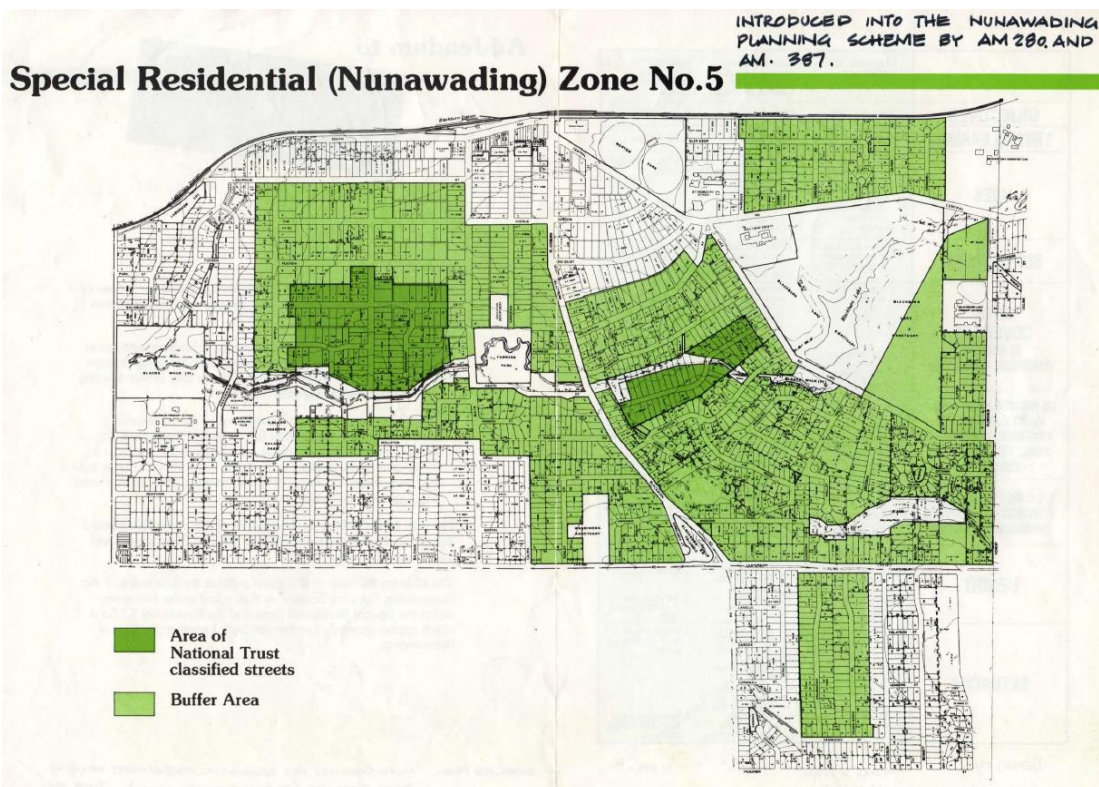


Figure 6. The Amendment 280 resulted in Special Residential Zone (SRZ5) which was gazetted 8 June 1988 into the Nunawading Planning Scheme.

Two small areas of Blackburn had previously been classified by the National Trust because of their unique character - which was described in the citation as demonstrating *"an excellent integration between the natural and man-made environments"*. The dominant feature of the 'Bellbird' area is the tall indigenous trees on private land and within the road reservations. This area is known as SLO1 in the Whitehorse Planning Scheme.

Blackburn Lake Sanctuary and Creeklands.

For many Blackburn people, the Blackburn Lake Sanctuary and associated Creeklands are treasured as part of our heritage.

With its native bushland surrounding a man-made lake, Blackburn Lake Sanctuary has **unique** suburban, regional and state significance. Geographically placed in the heart of the City of Whitehorse, it is surrounded by a special suburban area with equally unique but constantly threatened streetscapes. In many ways it is a miracle that the bushland setting in the residential area around Blackburn Lake and the Creeklands is mostly intact. It **has** survived only because of the community's constant vigilance.

The Blackburn community groups including the Blackburn Village Residents Group, Blackburn and District Tree Preservation Society, Bellbird Residents Advocacy Group, The Combined Residents

of Whitehorse Action Group and others have been concerned for many years about the erosion of planning controls that reduce canopy tree cover and native vegetation and has taken an active part in engaging with council and government over planning scheme amendments.

The unique habitat of Blackburn Lake and the Creeklands relies on the vegetation corridors and linkages provided by public reserves and liner parks and in a large way on the vegetation in private properties in the surrounding streets. In most cases the significance of streets with canopy trees have been recognised through Significant Landscape Overlays. In 2004, with the change in zoning, other streets with important vegetation were included into the new Neighbourhood Residential Zone and have a neighbourhood character classified as Bush Suburban to reflect their importance in providing linkages and buffers to the Bush Environment areas.

The Special Significance of Trees and Vegetation in the City of Whitehorse.

In a Delegates report for the City of Whitehorse relating to a proposed development at 150 Central Road Blackburn within SLO2 it was said that *“Bush Environment” land is at the top of the Councils character precincts hierarchy in respect to land which has the most significant landscape character and environmental integrity. It is these small “pockets” within the municipality that Council seeks to fiercely protect from inappropriate development.*”

Urban Forest Strategy

Council and the community are concerned that the removal of canopy trees and vegetation will erode the neighbourhood character of Whitehorse. Of particular concern is the clearing of all trees from sites prior to development. Council's Urban Forest Strategy for 2021-2031, outlines the vision, policies and actions relating to Whitehorse's tree population and has set a target for canopy cover of at least 30% by 2030.



Figure 7. Why the concern? - The greatest proportion of remaining trees are on private land.

A Brief History of Blackburn

Blackburn was named after James Blackburn (1803–1854), civil engineer, surveyor, and architect, who had been transported to Van Diemen's Land in 1833 for forgery. Granted a free pardon in 1841, he continued his remarkable career in Van Diemen's Land as a well-respected architect and surveyor until he decided to move with his family to Melbourne in 1849. Regarded as the founder of Melbourne's water supply (with Clement Hodgkinson), James Blackburn died of typhoid fever at the age of fifty-one. It was Hodgkinson who named the creek after his colleague. The settlement, which subsequently grew along the creek, became known as Blackburn Creek. The original Travellers' Rest was built in 1861 on twenty acres of land in Whitehorse Road, purchased by Joseph Counsel the first licensee. After Healesville was founded in 1864, the Cobb and Company coach set up a service from Melbourne, via Blackburn Creek, through Anderson's Creek (now Warrandyte) and onwards to Healesville and Wood's Point. The Blackburn Creek Post office opened in January 1876, indicating the number of settlers in the area had risen.

The major development, however, occurred when in 1882 the rail line was built between Camberwell and Lilydale (with a station at Blackburn Creek). The opening of the railway on 1 December 1882 triggered great interest from many people and companies in Melbourne. At this time, the name '*Blackburn*' was adopted. The Freehold Investment and Banking Company, owned by Sir Matthew Davies, purchased 1000 acres of land surrounding Blackburn Railway Station. They are credited with damming the stream which made the Lake. Irregular in shape, deep as 50 feet where an old clay pit was included, and surrounded by regenerated natural indigenous vegetation, the Lake has the appearance of an unspoiled Australian bushland.

The Company set about to create a beautiful suburb, a '*Model Township*' that was to be the '*Toorak*' of the eastern suburbs. Within two years the company had set out streets with bluestone kerbs and channels, formed footpaths illuminated with gas lamps, and built some substantial houses. One of the major attractions in Blackburn written about in the *Box Hill Reporter* of August 1889⁶ was the lake, a natural water channel 'the beauties of which have been enhanced by the art of man'. The newspaper waxed lyrically about the rugged beauty of the area and the homes '*nestling among some stately trees*. People came by steam trains in converted cattle trucks to enjoy picnics in the bushland setting. When the Adult Deaf and Dumb Society (now Adult Deaf Society of Victoria) bought and occupied the Lake and surrounding land in 1908, the area remained a popular recreational area. It was zoned '*Open Space*' both before and after its purchase by Nunawading Council in 1964.

The builders realised very early on that the tall trees were an added attraction to the area and so although by 1910 the eastern portion of the Blackburn Township estate had been subdivided, the sale advertisements featuring the blocks were able to state . . . '*fortunately still well studded with fine varieties of eucalyptus*. . .'

Some of the first houses, built soon after subdivision, remain in the area. One of the most influential designer/builders in Blackburn was Algernon J. Elmore who by 1916 had established his home and workshop in Blackburn. He was a proponent of the '*Arts and Crafts*' and '*Fresh Air*' movements of early twentieth century. He was one of the pioneers of Victorian Hardwood construction, including weatherboards, flooring, and interior joinery in his Blackburn bungalows, embodying those movements' ideals of closeness to nature, naturalistic designs, and craftsman

⁶ Robin Da Costa, *Blackburn: A Picturesque History* (Lilydale: Pioneer design Studios, 1978) pp. 36-44

construction. Known as a keen conservationist, he custom designed each home around the Blackburn landscape so that it sat naturally within each site. He would also offer planting advice on suitable native species having a great personal interest in Australian native plants. His designs have a unique and distinctive Australian character with their large insect screened verandas and the use of native hardwoods. Although many of these early blocks have since been subdivided the legacy of those times remains in the deep blocks, treed gardens, and rights of way. His influence is still felt in Blackburn where people treasure their tall trees and the shrubberies, where birds and possums share the environment.

Elmore wasn't the only proponent of the '*Fresh Air*' movement in Blackburn. In June 1915, the Department of Education commenced operation of the '*Open Air School*' located in the Blackburn Township Estate subdivision. The school provided twelve-month periods of respite for sickly children from the industrialised inner suburbs of Collingwood, Richmond, and Fitzroy. The department believed that the fresh air of Blackburn, bush environs, activities such as nature study, native shrub paintings, bird observation and the provision of a healthy diet would restore the health of these sick children. The school remained in operation until 1964 when the increasing number of social welfare programs offered by state and local governments decreased the need for such a program.

Blackburn was the home of painters such as Frederick McCubbin, whose '*Bush Burial*' scene was painted in his backyard in 1890.



Figure 8. Frederick McCubbin '*Bush Burial*'