

COMMUNITY SUBMISSION

Victorian Government Train and Tram Zone Activity Centres Program

Phase 2 Consultation — Blackburn, Nunawading and Mitcham Cluster

March 2026

Submitter	Resident, Blackburn (Whitehorse LGA)
Activity Centre	Blackburn (primary); Nunawading and Mitcham noted
Reference	Phase 2 Draft Maps — Blackburn–Mitcham Cluster (TTZAC Program)
Date	March 2026
Consultation closes	Sunday 22 March 2026

1. Preamble and Standing

I am a resident of the City of Whitehorse and a regular user of Blackburn Station and the Blackburn Village precinct. I submit this response to the Phase 2 consultation on the State Government's Train and Tram Zone Activity Centres Program (TTZACP), covering the Blackburn, Nunawading and Mitcham cluster.

I support Melbourne's need for more housing and acknowledge the role that transit-oriented development can play in delivering it. My objection is not to density per se, but to the scale, distribution and governance of the density proposed in the draft maps — which I believe would damage neighbourhood character, place disproportionate infrastructure pressure on Blackburn, and ultimately fail to deliver the housing outcomes promised. I offer specific, evidence-based alternatives.

My submission draws substantially on the formal submission lodged by Whitehorse City Council to Phase 2 (Council Meeting 16 March 2026, Agenda Item 10.11, Attachment 1 — hereafter 'Council Submission'). Council's analysis is technically rigorous and community-grounded; I endorse it and ask the Department of Transport and Planning (DTP) to treat these arguments as reinforcing each other.

2. The Housing Growth Index Classification of Blackburn is Disproportionate

The proposed planning controls derive primarily from the Housing Growth Index (HGI) assigned to each centre. Blackburn has been assigned HGI 3 — a classification that unlocks building heights of up to 16 storeys on some sites and a predominant maximum of 12 storeys across much of the core. Nunawading and Mitcham have been assigned the lower HGI 2, permitting up to 12 storeys only on selected large-opportunity sites.

According to Council's assessment of the State Government's earlier 'Density Index' framework (City of Centres, May 2024), Blackburn scores a Density Index of 6, while Nunawading and Mitcham score

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5. Critically, when translated to activity-centre typologies, all three centres fall within the same 'Moderate Density' band. There is therefore no analytical basis in the State's own prior methodology for treating Blackburn as a materially different growth location.

Council Submission — Section 4.1.1

"This marked discrepancy indicates that the current HGI assignment is the principal driver of the proposed development scale, rather than considerations of local context. Consequently, reviewing and adjusting Blackburn from HGI3 to HGI2 is essential to ensure built form outcomes that align with Council's objectives for context-sensitive, incremental, and appropriately scaled development."

The practical impact of the HGI differential is stark. Under HGI 3, the 'Non-Heritage Main Street Core' typology permits a maximum of 40 m (approximately 12 storeys). Under HGI 2 the same typology is capped at 27 m (approximately 8 storeys). This single classification decision — which has not been transparently justified — doubles permitted height on South Parade relative to what would apply if Blackburn were assessed consistently with its neighbours.

Recommendation

DTP should reclassify Blackburn from HGI 3 to HGI 2, consistent with its Density Index score of 6 and with the classification of Nunawading (score 5) and Mitcham (score 5) at HGI 2.

3. Proposed Building Heights are Excessive and Inconsistent with Local Context

3.1 Blackburn Village and South Parade

South Parade is the heart of the 'Blackburn Village' — a fine-grain, heritage-influenced street with narrow lots (some less than 5 m in width), a legible pedestrian scale, and deep community attachment. The State Government's draft maps propose up to 12-storey development along the south side of this street. This is not only architecturally incompatible with the precinct; it is economically unrealistic.

Council's 3D built-form modelling confirms that achieving 12-storey outcomes on South Parade would require amalgamation of multiple narrow lots with a depth ratio of approximately 1:6. Given the fragmented ownership pattern, such consolidation is unlikely in the short-to-medium term and should not form the basis of a strategic plan that is claimed to deliver housing supply. Council's own modelling, using the DTP's built-form typologies, demonstrates that 8-storey outcomes are achievable and appropriate on this street.

Council Submission — Section 4.2.1

"It is recommended that building heights along South Parade be limited to 8 storeys (the maximum height identified for the 'Non-Heritage Main Street Core' typology in centres with HGI:2), and properties behind them should be limited to 6 storeys (Fringe Built Form typology), followed by a transition to 3 storeys within the Outer Catchment."

A stepped height arrangement — 8 storeys on South Parade, 6 storeys on properties behind, transitioning to 3 storeys in the Outer Catchment — would maintain pedestrian scale, protect the established street rhythm, and still represent a very significant uplift from current controls (which under DDO8 set preferred maximums of only 10–15 m in this precinct).

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Recommendation

Building heights along South Parade should be capped at 8 storeys, with a stepped transition to 6 storeys (fringe) and 3 storeys (outer catchment). This is consistent with HGI 2 typology standards and is achievable given lot configuration.

3.2 The Blackburn Hotel and Sikh Temple Precinct (101–127 Whitehorse Road)

The draft maps propose up to 16 storeys on the Blackburn Hotel site and adjoining lots at 101–127 Whitehorse Road. These sites sit at the interface between the activity-centre core and established low-rise residential areas to the north, east and west. At 16 storeys, these buildings would be visible across a wide catchment, would cast significant winter shadows on adjoining properties, and would represent an abrupt rather than graduated transition.

I support the principle that large consolidated sites should carry taller development, but the heights proposed here — driven purely by the HGI 3 classification — are not calibrated to the interface conditions. If Blackburn were reclassified to HGI 2, the large-opportunity-site typology would still permit significant height (up to 40 m or more subject to urban-design testing), but within a more appropriate and transparently justified framework.

Master planning is essential for this precinct. A masterplan process would allow height, setbacks, overshadowing, wind, and public-realm outcomes to be assessed holistically across the combined site, rather than applied mechanically from a state template.

Recommendation

Mandatory master planning should apply to 101–127 Whitehorse Road (including the Blackburn Hotel and Sikh Temple sites). Maximum heights on this precinct should be reviewed consistent with an HGI 2 reclassification, reducing the 16-storey envelope to 12 storeys.

3.3 Recent Development Undermines the Credibility of Proposed Heights

Several sites nominated for high-density uplift have been recently developed or substantially renovated at much lower densities. The site at 173–175 Whitehorse Road (corner of Surrey Road) has recently been developed as a 5-storey apartment building under current controls — yet the draft maps designate this site for up to 12 storeys. Similarly, established car-related businesses at 138–144 and 146 Whitehorse Road (Lexus and Nissan/Kia dealerships) have undergone recent fit-out investment; there is no realistic prospect of their redevelopment in the planning horizon of this plan.

Council Submission — Section 4.2.1

"This context underscores a critical consideration in assessing activity centre planning: the achievability of the proposed building heights and the realism of redevelopment expectations, and the risk that the draft plans create a false capacity for housing growth."

Planning controls that nominate unrealistic heights on recently developed or economically active sites do not create housing supply — they create a 'paper capacity' that satisfies a spreadsheet while delivering nothing on the ground. For housing policy credibility, height designations should reflect genuine redevelopment potential within the plan's horizon, informed by building life cycles and economic feasibility assessment.

Recommendation

DTP should undertake realistic economic feasibility and redevelopment-potential testing for each nominated uplift site, and exclude recently developed properties from high-density designations where redevelopment within 15 years is implausible.

4. Overshadowing, Amenity and Infrastructure

4.1 Overshadowing of Public Realm and Open Space

The draft plans include no meaningful overshadowing assessment for Blackburn's public realm. Under the DDO8 controls that would be removed, preferred maximum building heights of 10 m (South Parade) to 15 m (Whitehorse Road corridor) provided an implicit sun-access framework. The replacement Built Form Overlay (BFO) has not been tested to demonstrate that equivalent or better solar access outcomes can be achieved.

In comparable precincts covered by the draft plans, Council's modelling is instructive. At Wood Street Park in Nunawading, Council's solar analysis found that proposed 6-storey development immediately north of the park would overshadow more than 50% of the park area during the winter solstice between 10:00 am and 3:00 pm — reducing a currently well-lit community space to shadow for most of the day. The same methodology should be applied to Morton Park and other open spaces in the Blackburn catchment before planning controls are finalised.

Council Submission — Section 4.2.1 (Nunawading)

"Council recommends that a 'High Protection' designation be applied to Wood Street Park, corresponding to mandatory sun access protection (no additional overshadowing between 10 am and 3 pm on 21 June), to safeguard its ongoing amenity and public value."

Recommendation

Mandatory shadow modelling at the winter solstice should be required for all public open spaces and key pedestrian streets within the Blackburn core and catchment before planning controls are adopted. Outcomes should meet a minimum standard of no additional overshadowing between 10:00 am and 2:00 pm.

4.2 Traffic and Transport Infrastructure

Blackburn Road, Station Street, Whitehorse Road and the station precinct itself already experience significant peak-period congestion. The proposed 10–16 storey buildings near the station, if realised at anything approaching their theoretical capacity, would generate substantial additional vehicle and pedestrian demand that the existing network is not designed to accommodate.

The draft plans include no traffic modelling, no infrastructure capacity assessment, and no committed funding pathway for upgrades. Amendment VC277 (effective December 2025) reduces car-parking requirements in locations with good transit access — a sensible policy direction — but does not resolve the conflict between removing parking and an arterial network already at or near capacity during peak periods. Reduced parking provision in new developments risks increasing on-street parking demand in surrounding residential streets.

Whitehorse Road and Springvale Road, which define the spine of the cluster, are characterised by the Council Submission as 'hostile environments for pedestrians.' Integrated transport planning — speed reductions, improved pedestrian crossings, cycling infrastructure — should precede, not follow, the adoption of density controls.

Council Submission — Section 4.3.5

"Council and the community have consistently raised concerns that increased housing densities must be matched by adequate infrastructure provision, including transport networks, active transport links, open space, schools, community facilities, stormwater management, and flood mitigation."

Recommendation

DTP should commission and publish comprehensive traffic modelling for the Blackburn, Nunawading and Mitcham centres before planning controls are finalised. An Infrastructure Contributions Plan and Community Infrastructure Needs Assessment must be released alongside any final planning controls.

5. Catchment Boundaries: Walkability and Sensitive Interfaces

The draft inner and outer catchment boundaries extend well beyond a genuine 10-minute (approximately 800 m) walking distance from Blackburn Station in several directions. Council's own network-based walkability analysis identifies areas within the proposed boundaries — particularly to the north (Broomhill Avenue, north of O'Hara Street) — that exceed the 10-minute threshold by a significant margin when actual street routes and physical barriers (including the rail corridor itself) are accounted for.

The proposed inner catchment at these locations permits up to 4 storeys on standard lots and up to 6 storeys on larger sites. Applying this intensity to areas that are not genuinely walkable to the station is inconsistent with the transit-oriented development principles that underpin the entire program.

Council Submission — Section 4.2.3

"The reach of the inner catchment to properties in Broomhill Avenue and north of O'Hara Street is excessive; these areas are a long walking distance from the station and should be in the outer catchment to create a more reasonable transition."

Of particular concern is the interface between the proposed inner catchment along the north side of Laburnum Street and the Significant Landscape Overlay 2 (SLO2) area and Neighbourhood Residential Zone 1 (NRZ1) south of Laburnum Street. The juxtaposition of up to 6-storey development immediately adjacent to a protected landscape corridor — with no outer-catchment buffer — is inconsistent with any graduated transition principle.

Recommendation

The Broomhill Avenue and north O'Hara Street areas should be reclassified from inner to outer catchment. Outer-catchment controls should apply to the north side of Laburnum Street as a sensitive interface with SLO2 and NRZ1. DTP should publish its walkability methodology and demonstrate that all catchment areas satisfy the 800 m/10-minute standard via the actual road and path network.

6. Alternative Approach: Mid-Rise and Gentle Density Can Deliver Equivalent Yields

I want to be unequivocal: Melbourne needs more housing, and the Blackburn precinct — with its excellent train access, proximity to employment corridors, and established retail core — is an appropriate location for meaningful densification. My objection is to the form proposed, not the direction.

Evidence from comparable Australian and international contexts consistently shows that well-designed mid-rise development of 4–8 storeys across a walkable catchment can deliver equivalent or greater dwelling yields than concentrated high-rise, with lower infrastructure stress, shorter construction timelines (due to the absence of type-change construction above approximately 8

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storeys), better solar outcomes, and lower risk of the market-feasibility failures that have recently plagued Melbourne's apartment pipeline.

The following approach would, in my view, achieve meaningful housing supply while respecting the character and infrastructure realities of the Blackburn precinct:

- Reclassify Blackburn from HGI 3 to HGI 2, reducing the maximum building height on large opportunity sites from 16 to 12 storeys and on the main street core from 12 to 8 storeys.
- Apply mandatory master planning to the Blackburn Hotel / Sikh Temple precinct and the Solwood Lane area, ensuring height transitions, setbacks and public-realm outcomes are properly tested before development commences.
- Extend the Outer Catchment systematically across the broader walkable area west of Blackburn Road (subject to genuine walkability confirmation), enabling additional gentle-density townhouse and manor-apartment development that spreads supply more equitably without concentrating high-rise near the station.
- Mandate affordable housing contributions as a condition of any floor-area uplift above the existing DDO8 controls, consistent with recent amendments to the Planning and Environment Act 1987.
- Retain and extend green corridors, landscaped setbacks on Albert Street, Chapel Street, Railway Road and Whitehorse Road (as identified in Council's Foundation Map analysis), and require deep-soil planting within any development above 6 storeys to preserve canopy cover.

These measures, taken together, would produce a substantial increase in housing supply — proportionate to Blackburn's genuine infrastructure capacity — without the character disruption and feasibility risks that attend the current proposal.

7. Notes on Nunawading and Mitcham

While my primary focus is Blackburn, I note several issues raised in the Council Submission that apply equally across the cluster and that I endorse.

7.1 Nunawading

Nunawading has the strongest genuine redevelopment potential of the three centres, given its large underutilised commercial land (particularly the Home HQ, Harvey Norman and Amart precinct), proximity to the Whitehorse Civic Centre, and good transport access. However, the site at 193–195 Springvale Road — designated for 12-storey development — was built as a 6-storey building only within the last decade. Designating recently constructed buildings for high-rise redevelopment creates false capacity, not real supply.

Council's solar analysis for Wood Street Park (Section 4.2.1 of the Council Submission) shows that even 6-storey development immediately north of the park would overshadow more than 50% of the park during winter hours. I support Council's recommendation for High Protection designation for Wood Street Park and mandatory sun-access standards.

7.2 Mitcham

Council's built-form modelling for Britannia Mall in Mitcham demonstrates that the DTP-proposed heights would place the mall largely in shadow during winter solstice hours — a significant amenity impact on a key public space. I support Council's recommendation to reduce heights at 3/602 Whitehorse Road from 10 to 8 storeys at the Esplanade Reserve interface, and for Station Street to be reclassified as a Primary Active Frontage.

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The proposed catchment boundary in Mitcham extends inappropriately into the Gillies/Deakin/Fellows/Haines Street NRZ precinct (a cohesive residential neighbourhood renowned for its community character, including the Fellows Street Christmas lights tradition) and toward Simpson Park, where terrain and tree canopy make the area unsuitable for inner-catchment intensification. These areas should be excluded from the catchment or, at minimum, reclassified to outer catchment.

8. Process and Governance Concerns

The Phase 2 consultation has allowed only 40 days for community members and Council to review complex technical material — draft maps, built-form typologies, proposed planning controls and supplementary information — much of which was provided late and in fragmented form. The State Government's own drop-in sessions for the Blackburn–Mitcham cluster were not scheduled until day 30 of a 40-day consultation window.

The Housing Growth Index methodology — which is the primary determinant of proposed building heights — has not been made publicly available. Community members are therefore unable to evaluate whether the classification of Blackburn as HGI 3 is analytically justified. Transparent, evidence-based planning requires that the data and methodology underpinning major decisions be disclosed.

The Planning and Environment Act 1987 provides a mechanism for the appointment of an independent Advisory Committee to hear and report on submissions of this kind. I join Council in urging the Minister for Planning to appoint such a committee before any planning controls are finalised, to ensure that all parties — State Government, Council, and community — have a fair and transparent opportunity to be heard.

Council Submission — Section 4.4

"Council urges the Minister to refer all submissions, the draft plans and all technical information to an independent Advisory Committee for review and advice before deciding to amend the planning controls. This will give all parties a fair opportunity to be heard and will ensure that all strategic considerations are considered for this state significant program."

Recommendation

An independent Advisory Committee should be appointed by the Minister for Planning to review all Phase 2 submissions and the draft plans before any planning controls for the Blackburn–Mitcham cluster are gazetted. All background technical information, including the Housing Growth Index methodology and Housing Capacity Assessment Platform data, should be publicly released.

9. Summary of Requests

I ask DTP and the Minister for Planning to adopt the following positions for the Blackburn–Mitcham cluster:

- Reclassify Blackburn from HGI 3 to HGI 2, reducing the maximum building height envelope consistent with that classification.
- Cap building heights on South Parade at 8 storeys, with a graduated transition (6 storeys fringe, 3 storeys outer catchment).

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- Require mandatory master planning for large opportunity sites, including the Blackburn Hotel / Sikh Temple precinct, Solwood Lane, and the South Parade–Laburnum Street precinct.
 - Reclassify areas beyond genuine 800 m walkability distance (including Broomhill Avenue / O'Hara Street) from inner to outer catchment.
 - Apply outer catchment and graduated interface controls at the Laburnum Street / SLO2 / NRZ1 boundary.
 - Commission and publish shadow modelling for all public open spaces and key pedestrian streets before controls are finalised.
 - Commission and publish traffic and infrastructure capacity modelling, and release the Infrastructure Contributions Plan and Activity Centre Plans, prior to final controls.
 - Mandate affordable housing contributions as a condition of any floor-area uplift.
 - Publicly release the Housing Growth Index methodology and Housing Capacity Assessment Platform data to enable informed community scrutiny.
 - Appoint an independent Advisory Committee to hear Phase 2 submissions before planning controls are amended.
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I thank the Department of Transport and Planning for the opportunity to make this submission and trust that the concerns raised — both here and in the Council Submission — will be given full and substantive consideration before planning controls for the Blackburn–Mitcham cluster are finalised.

References

Whitehorse City Council (2026). Submission to the Phase 2 engagement for the State Government Train and Tram Zone Activity Centres — Blackburn, Nunawading and Mitcham. Council Meeting Agenda, 16 March 2026, Item 10.11, Attachment 1.

Department of Transport and Planning (2026). Train and Tram Zone Activity Centre Program Explainer, February 2026. State Government of Victoria.

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City of Whitehorse (2010). Megamile (West) and Blackburn Activity Centres Urban Design Framework. Whitehorse City Council.

City of Whitehorse (2025). Open Space Strategy Technical Report 2025. Whitehorse City Council.

State Government of Victoria (2025). Amendment VC277 — Reducing Car Parking Requirements in Locations Well-Served by Public Transport. Effective 18 December 2025.

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