

## **Stevo Gibbs**

to activity.centres,

To whom it may concern:

The proposed “Activity Centre” for Blackburn is being presented as forward-thinking urban planning. In reality, it reads more like a disconnected, top-down imposition that ignores both market signals and established best practice in housing and social planning.

At its core, the proposal assumes that concentrating high-density development—up to 16 storeys in Blackburn and 12 storeys in Nunawading and Mitcham—will somehow solve housing affordability and supply issues. That assumption does not hold up under scrutiny.

Housing experts and urban planners have consistently pointed out that dispersing density—through subdivision, duplexing, and small-scale infill across established suburbs—is a far more effective and sustainable approach. It spreads impact, integrates communities gradually, and crucially, produces housing at price points people will actually buy. Concentrated high-rise development, on the other hand, tends to deliver investor-grade stock at inflated prices, detached from local demand.

The situation in nearby Box Hill is a clear warning sign. There are over 700 apartments sitting unsold, many priced above \$750,000. This is not a supply shortage—it is a mismatch between what is being built and what people can afford or are willing to pay. Replicating this model in Blackburn risks creating the same outcome: empty towers, stalled developments, and a hollowed-out local economy.

The draft maps raise a number of serious concerns that have not been adequately addressed.

First, the proposed building heights are entirely out of scale with Blackburn’s existing character. A jump to 16-storey towers represents a dramatic and irreversible shift. These are not incremental changes; they fundamentally alter skyline, streetscape, and livability. In Nunawading and Mitcham, 12-storey developments present similar issues, particularly where they directly interface with low-rise residential areas.

Second, the defined “core” and “catch” boundaries appear arbitrary and blunt. They impose uniform density expectations without sufficient regard for local conditions, street widths, existing infrastructure, or community identity. Planning should respond to nuance, not erase it.

Third, heritage-listed shops and established streetscapes are at risk. Once overshadowed or surrounded by high-rise development, their value—both cultural and economic—is diminished. Heritage protection cannot just exist on paper; it requires compatible surrounding development.

Fourth, interface issues have been largely glossed over. High-rise buildings adjacent to single-family homes create well-known problems: overlooking, overshadowing, wind tunneling, and loss of privacy. These are not minor inconveniences—they directly impact residents’ quality of life. Similarly, the impact on parks and reserves must be taken seriously. Public open space loses value when it is cast into shadow or overwhelmed by density beyond its capacity.

Fifth, amenity impacts are being underestimated. Increased density brings increased demand on roads, parking, public transport, and essential services. Without clear, funded infrastructure upgrades, the result is predictable: congestion, reduced walkability, and declining livability. “Active transport” only works when supported by safe, connected, and uncongested environments—not when layered on top of already strained systems.

Finally, infrastructure provision remains vague at best. Schools, healthcare, utilities, and public transport capacity must precede or at least match population growth. Promising density without delivering infrastructure is not planning—it’s deferring the problem.

Taken together, these issues point to a deeper concern: this proposal appears driven less by community need and more by land value uplift. Rezoning for high-density development dramatically increases land prices, benefiting a narrow group of stakeholders while transferring the costs—social, environmental, and infrastructural—onto the broader community.

That raises legitimate questions about motive. When existing evidence shows that high-rise supply is not being absorbed, and when alternative, more balanced approaches exist, pushing ahead with this model looks less like planning and more like a revenue strategy.

There is a better way forward. Encouraging medium-density infill across multiple suburbs—townhouses, duplexes, low-rise apartments—would deliver more diverse housing, at more accessible price points, with far less disruption. It would also allow infrastructure and services to scale more naturally, rather than being overwhelmed in concentrated pockets.

Blackburn does not need to become another overbuilt, under-occupied high-rise zone to contribute to housing supply. It needs thoughtful, evidence-based planning that aligns with how people actually live, buy, and use space.

As it stands, the proposed Activity Centre fails that test. It is too tall, too concentrated, too disconnected from market reality, and too dismissive of local context. Without substantial revision, it risks leaving Blackburn with the worst of both worlds: lost character and unmet housing needs.

Regards,

Stevo Gibbs