

## **Feedback on the Blackburn Activity Centre Stage 2 Plans**

From the outset it is recognised that a controlled level of development around railway stations is desirable, and it is pleasing that government has listened to feedback from the Stage 1 consultation by excluding the SO1 & 2 areas from further consideration. However, the scale and location of the proposed remaining Blackburn development is inappropriate and inconsistent with surrounding land uses.

The government's plan focuses on built form solutions to a singular problem (ie. we need more housing), rather than working from social requirements and community needs to deliver a desirable and mutually accepted outcome. The adopted approach tends to alienate communities rather than reinforce the values held dear by communities

Whilst more intense development along the Whitehorse Road corridor, north of the railway line could be supported, it is not appropriate for a similar level of development to be proposed for the area south of the railway line within a high-quality low rise residential area.

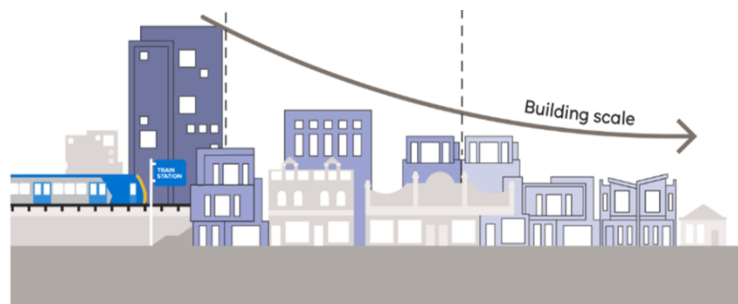
This document addresses the proposed planning changes south of the railway line and offers solutions to preserve the existing residential environment whilst supporting appropriate upscaling of housing densification.

### **12-Storey development is inappropriate along South Parade**

The scale of buildings proposed is inconsistent with surrounding residential areas which are exclusively single and double storey detached houses with a scattering of low-density units. Placing a continuous row of 12-storey towers along South Parade is completely out of scale for the area and will destroy the Village feel that the community provided as feedback in Phase 1 as being very important. ***Higher density development is far more appropriate to the north of the railway line along the Whitehorse Road corridor where similar development is already focused. There is no precedent for anything greater than 3 stories to the south of the railway line.***

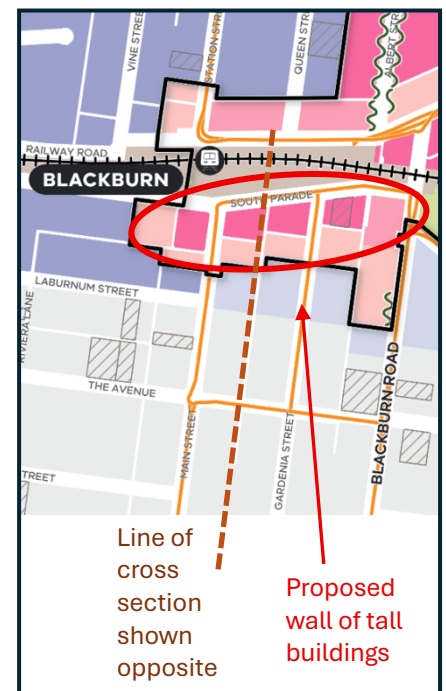
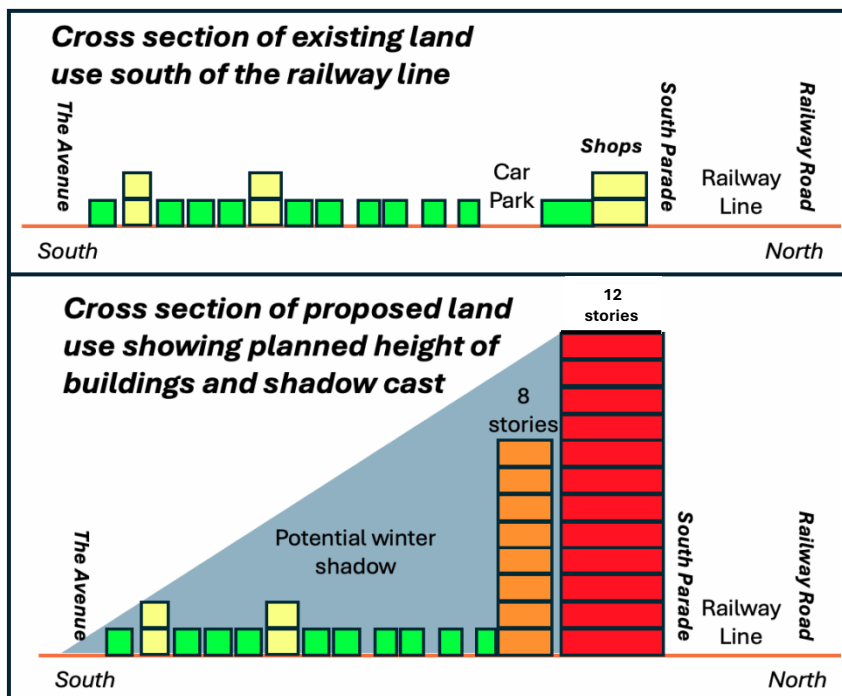
### **No graduated height increases from existing residential properties**

The Engage Victoria website provides a diagram showing what it believes good development looks like. It shows a gradual increases in heights from single storey houses up to 8-storey apartments. The proposal to transition from single storey homes such as those in Gardenia and Main Streets to the 12 storey towers along South Parade over a distance of less than 30m, is completely inconsistent with these guidelines.



The impact of the proposed development plan on the existing neighbourhood is demonstrated in the following schematic drawing which shows the massive leap in building heights and the shadowing effect on the surrounding residential area. **These impacts can be largely negated by focusing higher development towards the north side of the railway line, where there are already similar height developments, resulting from the current Council development overlay, and significantly reducing proposed heights in the south.**

**Cross section indicating existing and proposed building heights**



**No setbacks provided to residential properties south of the car park**

The proposed 8-storey height limits in the Council car park area will result in a significant impact on homes along its southern boundary. In many cases the 8-storey buildings will be within 1m of those single storey homes. These homes have windows, which are an important source of light, that will be blocked, and their established gardens will never see sunlight. **The solution is to provide setbacks that ensure any new buildings adjacent to these homes do not block sunlight.**



**Shadowing affects will impact residents' lifestyles and health**

The wall of tall buildings along South Parade (as demonstrated in the diagram above) will cast extensive and unbroken shadows on the residential area to the south reaching almost to The Avenue. The affected homes will see no sunshine during the depths of

winter and those closer to the tall buildings will suffer loss for most of the year This is in complete contrast to Government policies and programs aimed at encouraging the uptake of rooftop solar electricity generation. ***The proposed building heights along South Parade and Council car park must be significantly reduced to remove shadowing, and suitable height setbacks provided for developments adjacent to existing houses.***

### **The car park behind the existing shops is important to retailers/traders**

On any given day, this car park is heavily utilised by people who access the retail shops and other businesses in the area. The proposal to plan for 8-storey developments on this land will have major financial impacts on traders affecting their viability. Time limits ensure that the carpark is not used by rail commuters. ***It is important to the financial viability of the Blackburn traders that this car park is retained.***

### **Flooding issues have not been addressed**

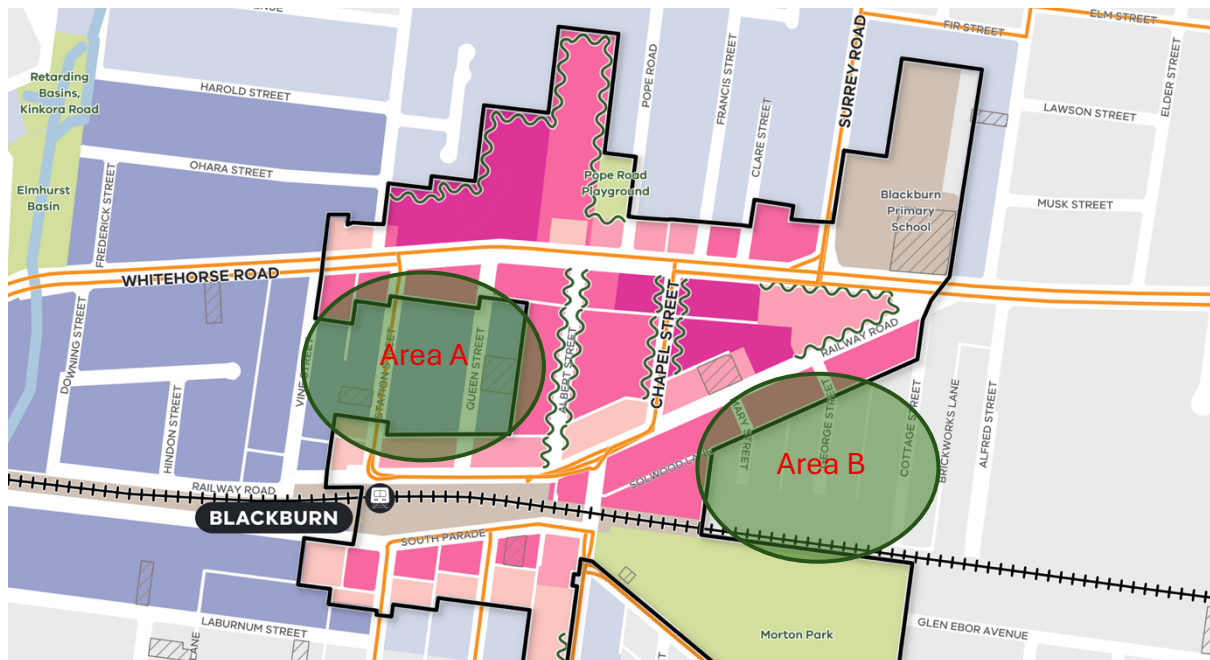
The South Parade area is subject to a Flood Overlay that will restrict some forms of development and which is currently being updated by Melbourne Water. Increased impervious hard surfacing will channel more runoff into the already inadequate drainage system, made worse without the mandatory inclusion of open spaces with vegetation that allows absorption of flows within the plan. ***The plan must be modified to recognise the impacts of flooding and demonstrate where and how appropriate mitigation will be provided.***

### **Development assumptions for the Outer Catchment area are flawed**

The plan shows a small 'Outer Catchment' area just south of the Council car park area with a specification that this area can be increased to three storeys and up to 4 four storeys on large sites. The reality is that the area consists of town houses/units which are in private ownership on small title, privately owned land parcels. These sites are unlikely to be developed due the difficulty to consolidate into suitable sized lots as proposed in the plan and therefore will remain single/double storey. This leaves these low height homes to interface with the proposed 8-storey building proposed for the Council car park. This part of the plan is deeply flawed and if properly considered would lead to different planning outcomes. ***The solution is to remove this 'Outer Catchment' designation and amend downwards the height limits on the car park area to better reflect its interface with the adjacent single storey land use.***

## Development to be spread rather than intensifying it into small areas

Given that the aim has been to provide higher population numbers around train stations, then it is important to consider all available land options rather than simply plonking a cluster of very tall buildings in the immediate location of the station. By choosing appropriate land parcels not currently earmarked for high density or very tall buildings it will be possible to consider a reduction in the height of those buildings south of the railway line delivering improved associated social impacts due to the reduction of the the intensification. The diagram below indicates areas where new or uplifted planning options would deliver this outcome.



### Area A

This area will be completely surrounded by 8-storey and 12-storey buildings and will exist as to canyon with reduced light and a view only of the ugly rear of surrounding building (something twwhere architecture is rarely aimed to impress) By lifting this area to 4-storey, but better the currently existing, 8 storey then there would at least be some consistency in design. The church could become the centre for social activities, with a design outcome like the way the Wesley Church in Lonsdale Street (CBD) was addressed, breathing enhanced life into the Heritage building

### Area B

Consists of scattered buildings and wide areas of private car parking with the small number of commercial activities being of low quality and could be readily relocated to other industrial areas with minimal impact on commercial land supply.

Whilst this area is not currently zoned residential this area is ripe for renewal and redevelopment given its close location to the



station and recreation facilities such as Morton Park and Blackburn Lake via an existing bridge over the railway corridor. Overshadowing of the Morton Park is not an issue with appropriate setbacks in place

Current planning appears to resort to centralised high rise buildings as an easy fix to future housing expectations without consideration of the broader picture that would deliver much better social and environmental outcomes. ***The solution is to significantly reduce the height of buildings along South Parade to 4-storeys and transfer the resultant reduction in housing provision into these alternative areas thus delivering improved social environmental and economic outcomes.***

### **Car parking must be provided within the footprint of any new buildings**

Exemptions within the planning rules avoids the provision of car parking in buildings close to public transport zones. This is based on a fallacy that residents will be able to satisfy all their travel needs solely by using public transport. Furthermore, parking for visitors and trades people will require consideration. The reality is that many residents will still own cars and seek to store them somewhere. Unfortunately, in such circumstances the only option will be to use surrounding residential streets thus causing parking congestion and restricting vehicle movements. Given the intensity of the proposed development this will be a significant problem if not addressed. For example, Gardenia Street and The Avenue are bus routes and excessive parking will severely inhibit operations and cause safety concerns. ***The solution is for all new buildings to provide for residents' cars and as well as allocated spaces for visitor and service vehicle parking within their design.***

### **No consideration has been given to waste management**

Existing access to the retail shops is already an issue with large numbers of bins lining the streets for days on end and significant noise affecting residents in the middle of the night as a result of trucks collecting commercial waste bins. The laneway towards the side and rear of South Parade properties are not wide enough to accommodate the additional demand and some of these lanes are also not in public ownership thus questioning their availability to be used for that purpose.

### **Insufficient open space provided to meet increased population**

The planning proposal represents an enormous uplift in population, yet no new open space or recreation areas are included in the planning. The ratio of open space to population within the plan is grossly distorted by the inclusion of the existing Morton Park and Pope Road Playground. These are well outside the Core Activity Centre area and have been included by some inspired boundary drawing which distorts the ratio of residents to openspace area. ***The solution is to provide new quality open spaces within the core Activity Centre for the recreation and socialisation of the greatly increased number of new residents.***

### **The planning process does not consider staging of developments**

It is undesirable for uncontrolled development to occur with random pockets of construction all over the planning area. Careful consideration will also be required with

respect of the provision of amenities and cost effective and timely development of services. There is a need to include a staging plan that focusses initial development in areas that are best suited in the first instance. For example, there is already intensification of land uses along the Whitehorse Road corridor with mixed height limits scattered throughout the area lending itself to infill development. On the other hand, the residential area south of the railway line does not have capacity in its services to cope with the proposed intensification of buildings and scattered development will put pressure on the early costly provision of upgraded services. ***The solution is to provide a staging plan that prioritises development of the area north of the railway line to improve timely provision of amenities and defer costly services upgrades.***

### **No consideration given to the impact on amenity**

The planning does not consider how the intensified land uses will interface with the provision for upgraded services. Some things that appear to have been overlooked include:

- The impact of the higher density land uses on the provision of basic needs such as electricity, water, sewerage, drainage etc
- The existing schools and childcare facilities within the Activity Centre area will not have the capacity to accommodate the escalating demand from new residents and no provision has been made for the location of new facilities.

***A detailed services capacity investigation and cost assessment must be undertaken before it is possible to plan for the level of intense development that is proposed.***

### **Environmental impacts completely overlooked**

Nowhere in the plan is there any consideration of vegetation, waterflows and open space. The plan represents hard building lines without any open space between them or anywhere that vegetation could be accommodated. Footpaths are insufficiently wide enough to accommodate trees of a decent scale and even where they may be they inserted will be unhealthy due to poor sun exposure and compacted root systems. This is absolutely contrary to sound urban design and has serious ramifications for liveability and public health.

In addition, homes shadowed by the high rises will see no direct sun resulting in the decay of existing plantings and the development of mould leading to serious health implications.

***The solution is to more closely match building heights with their surrounding impacts, reducing heights and providing open spaces between and around them for light to penetrate and nature to prevail.***

### **Why reinvent the wheel?**

Council already has an approved planning scheme for the Blackburn area which delivers a greater population uplift than that proposed in the latest Activity Centre Plan. Why has this not been considered? Why is there an emphasis on the provision of disastrous new high rises apartments that cause major concerns among the community when the existing Council planning has already been accepted by the

community? High rise buildings south of the railway line are both unpopular and unnecessary to deliver the population uplifts sought. ***If additional housing numbers are required, then look at rezoning fringe areas to allow the expansion of the core planning area towards the east and west along the northern side of the railway line.***

## **In summary**

The desire is for Blackburn to remain a viable and socially connected community such that increasing numbers of people moving to the area will continue to appreciate.

The proposed planning outcomes will unnecessarily and greatly impact residential areas to the south of the railway line. There is a need to significantly reduce building heights along South Parade and in the Council car park area in order to provide an acceptable transition of building heights from the single/double story residential area to the south of the proposed new developments. There is a need for modest increases in building height south of South Parade in line with sound planning practice. This would include the provision of appropriate setbacks from existing properties to preserve their access to light and privacy, something that is not currently included in the plans.

Issues such as the provision of on-site car parking, along with the provision of new open space, social services and infrastructure to support a development of this scale has not been adequately considered or demonstrated in the plan. These items loom as a threat to achieving the planned outcomes and need to be investigated before locking in the Activity Centre plan.

It is recognised that, in order to achieve these improved planning outcomes by reducing building heights south of South Parade, there would be a resultant reduction in the number of new houses delivered. To compensate for this, it would be appropriate to focus development intensification to select areas north of the railway line in areas not currently earmarked for significant uplift of height. This includes areas further along Whitehorse road that still sit within 800m of the station, rezoning additional areas east south of Railway Road (east of Blackburn Road), and the area west of Queen Street to enable higher density infill which would add a significant amount of additional housing stock.

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