

**CROWAG Phase 2 Submission  
Activity Centres – Draft Maps – 22<sup>nd</sup> March 2026.**

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## 1. Strategic Justification and Policy Alignment

CROWAG understands the need for increased housing to meet projected population growth in Melbourne over the coming decades. To meet these housing needs, **CROWAG supports well-planned, medium-density development in appropriate locations where it is guided by evidence, strategic planning and local context.** In the City of Whitehorse, the existing Council housing strategy is capable of meeting projected population growth identified by the Department of Transport and Planning, without the need for the proposed Activity Centre zoning changes.

Current RGZ and GRZ zoning already enables increased density near activity centres and transport hubs. Numerous approved developments remain unbuilt, largely due to land banking and delayed delivery, rather than planning constraints. These factors indicate that the proposed rezoning is not required to meet housing targets and is unlikely to resolve underlying supply issues.

The proposal also fails to align with established State and local policy objectives relating to environmental protection, neighbourhood character, growth supported with appropriate infrastructure and guided by democratic decision-making.

While the Whitehorse community welcomes and endorses the exclusion of SLO's from the proposed Activity Centres, the community is concerned with the lack of detail provided with the draft maps. We are aware that Council has been provided with more detailed information privately, but not the community, who are being asked to provide feedback on the draft maps without access to critical information on the rationale for the proposed plans.

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## 2. Housing Need and Extra Development Opportunities

While additional housing is required to support population growth, the proposed Activity Centre approach adopts a generic, “one-size-fits-all” model that does not recognise local conditions in Whitehorse.

Whitehorse Council’s existing housing strategy:

- Exceeds State housing targets.
- Distributes growth across the municipality.
- Integrates infrastructure planning.
- Protects areas of high environmental and heritage value, and importantly.
- Has been developed with community input.

A proven example of how the housing strategy works is the Blackburn Neighbourhood Activity Centre<sup>1</sup>, where growth has been concentrated north of the station and along Whitehorse Road, while protecting sensitive ecological and heritage assets to the south. This demonstrates that housing growth can be delivered effectively without undermining valued local places, with limited community disquiet.

Extra opportunities exist that should be included in the Activity Centre plans as they enable urban renewal of underutilised industrial land near transport, which would better support housing delivery objectives than intensifying development in environmentally sensitive residential areas.

These include:

- **Rezoning of the land around Solwood Lane, Blackburn** - along the eastern boundary of the Blackburn core, to facilitate mixed-use development, specifically extending westward from Cottage Street (located north of the rail line / east of Blackburn Road), Blackburn.
- **Partnering with Council to redevelop 2-24 Silver Grove, (Nunawading Reserve)**. Community & Council are keen to see quality development here - a key strategic site that appears to have been overlooked in the Nunawading Activity Centre map.
- **Uplifting the Commercial 2 Zone (C2Z) Precinct**, Nunawading (Amart, Harvey Norman, Home HQ and adjoining commercial land), **as well as key sites in Mitcham** - 1-9 Edward Street (Multi-deck Carpark), Shops 1-2/26 Enterprise Way (Supermarket) and 374 Mitcham Road (Open Car Park)
- **Decking the rail trench in Blackburn & Mitcham’s central commercial districts** would complement the current proposed development, as well as being an opportunity for each activity centre to provide more public open space and better connections across the rail line. Without this, both existing and future residents will struggle to access both the Stations and the shopping precincts.
- **Consolidating development along major arteries and existing growth zones using Whitehorse Council’s 2010 Megamile<sup>2</sup> (West) Blackburn Activity Centre Urban Design Framework (DD08) as the basis**. Integrating these existing plans into the Activity Centre catchments would expand the

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<sup>1</sup> [Megamile \(West\) Blackburn Activity Centre Urban Design Framework](#)

<sup>2</sup> [Megamile \(West\) Blackburn Activity Centre Urban Design Framework](#)

area available for dwellings, with limited impacts on residents due to their existing growth zoning (3 storeys), which could balance reduced storey heights in village cores.

- **Inclusion of an active transport link** along the northern side of the rail corridor between Blackburn and Laburnum and Blackburn and Nunawading that would link the dead-end streets from Whitehorse Road, opening car free access to stations and commercial businesses.

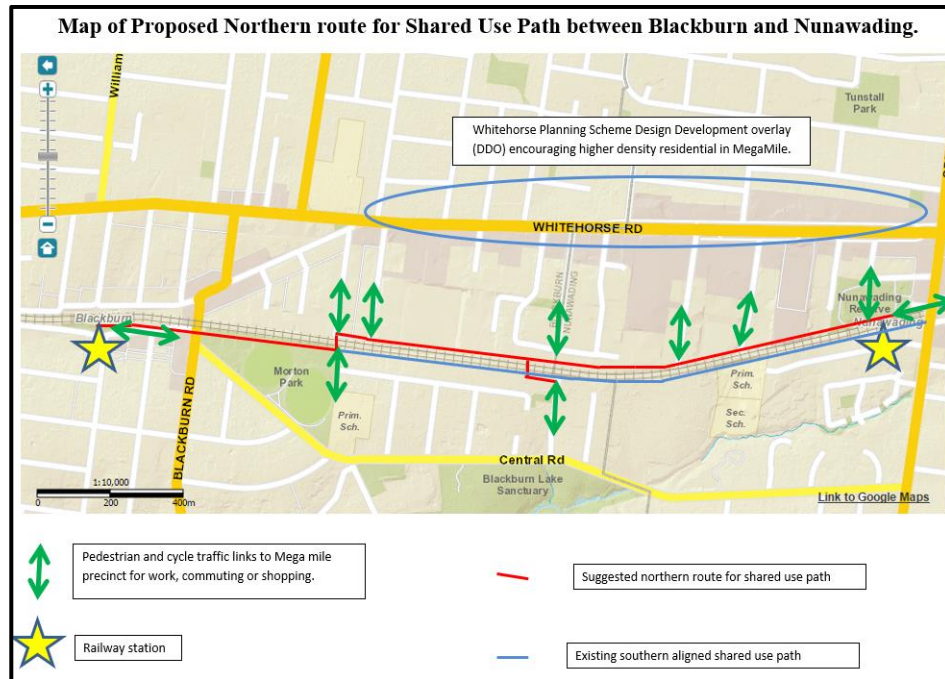


Figure 1. An active transport link between Blackburn and Nunawading.

### 3. Environmental Outcomes and Climate Resilience

While permanent SLOs 1, 2, and 4 in Blackburn and SLO 3 in Mitcham have been excluded from proposed activity centre catchment boundaries (which we strongly support), concerns remain regarding specific sites containing Significant Landscape Overlays (SLOs). This includes the new SLO11 protections associated with Gardiners Creek and Vegetation Protection Overlays (VPOs) that are still included within the proposed HCTZ boundary.

Whitehorse Council has adopted a target of at least 30% canopy cover by 2030, recognising trees as the most significant determinant of neighbourhood character and a critical contributor to climate resilience, biodiversity and community wellbeing.

The State government has also recently announced a canopy tree target but provided limited direction on how this will be achieved, particularly as the current planning provisions do not align with nor can realistically achieve the stated 30% outcome.

The Housing Choice and Transport Zone (HCTZ) planning provisions will allow as-of-right 3-6 storey apartment blocks occupying 80% of a site (plus hard surface for driveways and other paving) in the Catchment area surrounding the Activity Centres and will result in significant loss of mature tree canopy that currently exists on private land, directly conflicting with State and Council policy objectives. Inadequate space will remain that can support canopy tree targets to cool our city.

Loss of green space, tree canopy and local amenity will reduce liveability, discourage walking in hotter conditions and increase reliance on air conditioning, with long-term environmental and financial costs.

Our residential streets are being asked to do too much in these plans.

They are expected to:

- Provide the services we expect – water, power, gas, sewerage, storm water, phone and internet communication.
- Give up generous setbacks for greater density and canyoning.
- Provide a thoroughfare for cars, emergency services, delivery and construction vehicles.
- Be safe for cyclists, wheeling and pedestrians.
- Absorb overflow car parking that planning dispensation will force onto residential streets.
- Provide shade, habitat, carbon storage and amenity through street trees on whatever small permeable spaces are left. Wider crossovers for large developments reduce available space.

The private realm must contribute more to ensure a reasonable level of street amenity exists.

### **Key Issues with current plans**

Increased site coverage, reduced setbacks, limited tree protection and deep soil planting opportunities associated with re-zoning the “catchment areas” as Housing Choice and Transport Zone will:

- Reduce canopy cover well below policy targets.
- Increase urban heat and stormwater runoff.
- Exacerbate flood risk.
- Fragment wildlife habitat and ecological corridors.
- Impact/intrude on deliberately excluded sensitive areas at the boundary interface, if not appropriately managed

### **Requested Changes**

- Embed principles such as the **3-30-300 urban tree rule into planning provisions** which materially improve environmental and health outcomes and better align with State and Whitehorse policy objectives. The UNECE (United Nations Economic Commission for Europe) standard where you should be able to see 3 trees from your house, 30% canopy tree cover and be within 300m to public open space.
- **Strengthen tree retention and canopy protection requirements in both the private and public domain**; mandate large space allocations on both public and private developments, particularly to protect and increase canopy trees for shade/amenity.
- **Reduce building heights adjacent to SLO areas so as to reduce impact of light on sensitive bird and wildlife habitat.**
- **Implement the following changes to the proposed HCTZ Catchment area to protect Whitehorse’s significant environmental assets:**
  - **Exclude the SLO11 areas along Newburn Court Reserve including parts of Market Street and West Street, together with the Candlebark estate from the Nunawading Activity Centre’s catchment** in order to protect the headwaters of Gardiners creek. To support the protection of its significant landscape, environmental and residential amenity values it is

**recommended that Laughlin Avenue be designated as Outer Catchment** to ensure a more appropriate and graduated built form transition.

- **Reassign the area between Laburnum Street and the rail line in Blackburn** (which interfaces with SLO2) **as outer catchment** and strengthen protections at this sensitive interface, through a comprehensive urban design framework and detailed masterplan that ensures an appropriately context-responsive, graduated transition in built form.
  - **In Mitcham exclude the Neighbourhood Residential Zone areas - near Simpson Park** bounded by Garden Avenue, Creek Road, Simpson Street and Simpson Park. Also land between Burnett Street to William Street from inner catchment.
  - **Reassign Percy Street / Creek Road as outer catchment, due to terrain and extensive tree canopy considerations and** presence of a great number of VPOs. These areas require careful consideration to ensure that existing environmental protections are maintained.
  - **Reassign the core section of South Parade, Blackburn to inner catchment to better align with** the existing DDO8 which has preferred maximums of 9 –10m in this precinct. This would maintain pedestrian scale, protect the established street rhythm, and still represent a very significant uplift from current controls.
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## 4. Built Form, Character and Heritage

The proposed Activity Centre controls promote uniform, as-of-right building forms and heights that are incompatible with the established scale, character and heritage of Blackburn, Nunawading and Mitcham.

These centres are predominantly low-rise, village-scale environments with strong landscape, cultural and historical significance. Blanket height allowances and increased site coverage will erode sense of community, neighbourhood character and undermine the distinct identity of each centre.

### Key Issues with current plans

- Proposed building heights create abrupt transitions at Activity Centre boundaries.
- Overshadowing, visual bulk and loss of privacy for adjoining residential streets.
- Increased site coverage and reduced setbacks intensify amenity impacts.
- Lack of mandatory height and scale transitions between core and catchment areas.

### Requested Changes

- **Reclassify Blackburn from Housing Growth Index (HGI) 3 to appropriate HGI 2.** HGI 3 allows much taller buildings and is designed for areas with greater growth capacity than Blackburn<sup>3</sup>. Nunawading and Mitcham are classified as HGI 2, and Blackburn should be classified similarly due to the broad level of similarity of growth opportunity.
- Housing can be increased by rezoning some industrial areas to mixed use and expanding east and west along Whitehorse Road RGZ. This approach avoids excessive building heights in Blackburn from HGI 3 and distributes housing more evenly across the three activity centres.

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<sup>3</sup> Page 53 [City of Centres – Development of typology-based built form controls](#)

- **Introduce mandatory height transitions at all interfaces** with Neighbourhood Residential zones and apply graduated height controls between Activity Centre cores and catchments.
  - **Require increased setbacks and reduced site coverage** at residential boundaries and **ensure interface controls prioritise residential amenity.**
  - **Implement the following changes to the proposed HCTZ Catchment area to protect Whitehorse’s heritage/character:**
    - **Exclude Mitcham’s Northern Neighbourhood Residential Zone** near Ormond Avenue (Gillies/Deakin/Fellows/Haines Streets) from the catchment boundary. This is a **cohesive residential neighbourhood renowned for** its community character, including e.g. the community activated Fellows Street Christmas lights tradition. At the very minimum it should be reclassified as outer catchment.
    - **Exclude the Heritage Overlay Precinct on Thomas Street, Mitcham** from the Catchment boundary, and it is recommended to graduate transition from the Inner Catchment to the Outer Catchment **prior to the Heritage Overlay Precinct** to ensure a more sensitive interface with heritage areas.
    - **Link North Blackburn’s only open/green spaces - Cootamundra Walk. Larch St to Francis St and Williams Road south to Elmhurst Basin.** The streets surrounding this disparate green corridor need appropriate treatment to ensure access to public open space and future active transport connectivity is maintained. **Suggest the small portion of Pope Road above a nominal line between Fir Street and John street be removed from the catchment boundary in order to better enable these linkages** - particularly due to this area’s tree canopy quality and lack of infrastructure capacity, including limited emergency access.
    - **Reassign Blackburn’s Broomhill Avenue and areas north of O’Hara Street from inner to outer catchment** due to the distance and barriers to railway line.
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## 5. 12–16 Storey Building Impacts

### Key Issues with current plans

- Building heights of 12–16 storeys are inconsistent with the village scale of Blackburn, Nunawading and Mitcham.
- Significant overshadowing, light reflectivity and glint into streets, public spaces and neighbouring properties.
- Impacts from reduced access to daylight on vegetation health, thermal comfort and public space usability.
- Wind turbulence and tunnelling and poor microclimate conditions that reduce pedestrian and resident comfort and safety.
- Street and residential noise impacts through reflected road noise.
- Particular areas of concern are:
  - the proposed **16 storey development on the Blackburn Hotel/Sikh temple site** for both the local impact it will have on John Street, Pope Road and Francis Street, all currently designated Outer Catchment (Max 3-4 storeys) with no identified setbacks, as well as more generally the

eyesore it will be, due to its prominent position. The principle that large, consolidated sites should carry taller development is reasonable, but the heights proposed here driven purely by Blackburn’s HGI 3 classification and are not calibrated to interface conditions.

- **The proposed 12 storey building wall in Blackburn Village’s heart - South Parade** 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. As well outflow of lighting onto adjacent sensitive landscapes will impact on Blackburn’s night wildlife and adjacent residents for a long distance south.

**Reassigning of South Parade from core to inner catchment with a stepped heights from 6 storeys on South Parade, to 4 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. It would also better align with the existing DDO8 with preferred maximums of 9 –10m in this precinct.

DDO8-E (Remaining areas)	9 metres	In accordance with ResCode (excludes non-residential zones)	The scale and design of new development should respect the amenity of adjoining residential developments.  Discourage blank and inactive facades on built forms adjoining pedestrian walkways, footpaths, carparks and laneways, where applicable.
DDO8-F (28-30 Blackburn Road)	10 metres or 9 metres if adjoining residential zone.	3-5 metre landscaped front setback	Development must consider Clause 11.03-1L-01 Blackburn Neighbourhood Activity Centre, where applicable.  Improved streetscape interface and active frontage.
DDO8-F (Remaining areas)	10 metres or 9 metres if adjoining residential zone.	No setback	Development must consider Clause 11.03-1L-01 Blackburn Neighbourhood Activity Centre, where applicable.  New buildings designed to reflect the form and scale of existing heritage and older contributory buildings along South Parade.  Active frontages along all roads with weather protection where possible.

Figure 2. Whitehorse Planning Scheme DDO 8 Schedule.

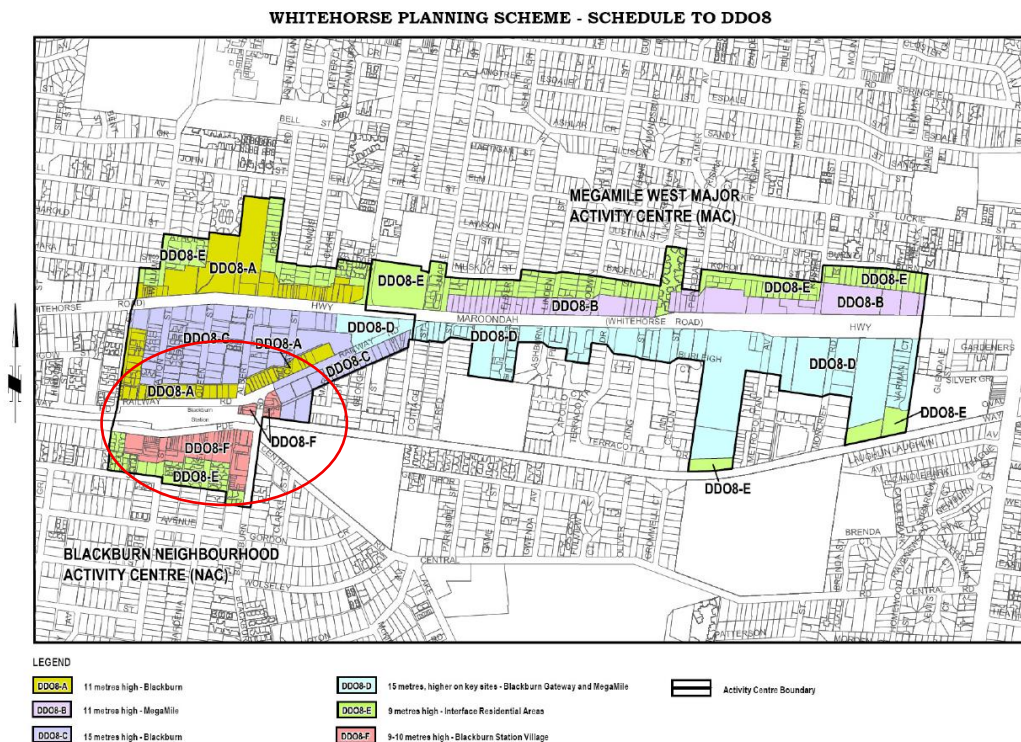


Figure 3. DDO8 E and F providing a sensitive interface. Should be amended to outer and inner catchment.

- **Similar concerns are held for proposed 12 storey sites in Nunawading and Mitcham due to their overshadowing/limited solar-access impacts on core public spaces – Wood Park (Nunawading) & Britannia Mall (Mitcham).** Council's built-form modelling for Britannia Mall demonstrates that the Activity Centre's proposed heights would place the mall largely in shadow during winter solstice hours — a significant amenity impact on a key public space.

### Requested Changes

- Embed human-scale urban design principles into developments, including articulated façades, active frontages and meaningful landscaping. **Each village core should be Max 8 storeys with quality transitions - particularly with setbacks between tall/medium/low level developments that minimise shading/overlooking on existing low-rise adjacent dwellings and optimise access to light for all and reduce wind-tunnelling effects.**
- **Reassign South Parade, Blackburn from core to inner catchment with a stepped height from 6 storeys on South Parade, to 4 storeys on properties behind, transitioning to 3 storeys in the Outer Catchment** to protect the established street rhythm, and better align with the existing DDO8 which has preferred maximums of 9 –10m in this precinct.
- Reassign Queen and Station Streets to within the core.
- Introduce **strict overshadowing and glazing controls** to protect sunlight access to streets and open spaces and **require wind and microclimate mitigation measures** for all multi-storey development.
- Ensure building envelopes support **daylight, thermal comfort, landscaping and street-level amenity.**
- Ensure **adequate front, side and rear setbacks** for landscaping and building articulation to minimise reflected light and noise and incorporate **appropriate height transitions and setbacks at zone boundaries** - between core and catchment areas.
- **Implement Overshadowing and solar access protections**, including:
  - High level protection for existing and future open space with mandatory sun access (no additional overshadowing) between 10am - 3pm June 21.
  - Solar protection of key public realm such as Britannia Mall, Mitcham and Wood Park, Nunawading between 10am - 2pm, 22 September.
  - At the spring equinox (22 September), ensure footpaths along key streets receive a minimum of five hours of sunlight and that new developments minimise additional overshadowing of the opposite footpath between 10:00am and 2:00pm.

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## 6. Infrastructure Capacity and Sequencing

The proposed doubling of dwelling numbers within established neighbourhoods is not supported by publicly available infrastructure planning.

### Key Issues with current plans

There is no clear strategy for delivering the additional capacity required of:

- Water, sewer and stormwater systems

- Transport and parking.
- Schools, health services and emergency services
- Open space and community facilities

These issues form the basis of local resident concern about the Activity Centre program, with their reasonable questions about how these will be dealt with continuing to be unanswered by the DTP. Existing lack of access to transport and commuter and trader parking needs, filling up the small streets that surround the Activity Centres, and the impact doubling the population will have outside the Activity Centre boundaries is of major concern to residents, and seemingly overlooked by the Activity Centre planning process.

Blackburn is marked for the highest density increase, however the major existing services are located away from the centre and not on a train line. Schools, health services, retail, food shopping and employment. This is unlikely to change. Access to these services in most cases requires a car. To some extent if train ticketing introduced a neighbourhood zone (3-4 stops from the home station) For example from Blackburn there would be an incentive to use the train to shop/visit/work at Box Hill or Ringwood. Currently cheap parking encourages car trips to these destinations.

Conversely increased population density in the surrounding general residential zone, 2-3 km from the station, without protected direct active transport links to stations will result in increased use of cars. The solution is to provide active transport planning early, develop Park and Ride stations away from the activity centres and operate an efficient bus shuttle.

The underlying emphasis/philosophy on reducing car parking to encourage “active transport” without building it, generates high demand for car parking spaces and disadvantages families with young children, the disabled, and older residents who rely on a car. Planning needs to include accessibility and ageing-in-place outcomes, to maintain independence and social participation.

Unlike greenfield development, Whitehorse’s Activity Centres are located in areas where land availability for new infrastructure is limited. Growth must therefore be planned and sequenced alongside infrastructure delivery through a coordinated master-planning approach.

### **Requested Changes**

- Require infrastructure planning and delivery to be clearly identified, funded and sequenced, **prior to increasing dwelling capacity.**
- **Mandate integrated master-planning for Activity Centres**, incorporating planning for; schools, open space, community facilities and utilities – particularly on large opportunity sites, as well as some strategically located smaller sites as detailed in Council’s submission.
- **Increase the provision of community infrastructure** to support the large/doubling of population proposed - particularly open space/sports facilities, childcare/education, medical/emergency facilities and council facilities like libraries/senior citizens/aged care.
- **Increased housing density must be supported by clear articulation and adequate provision of critical infrastructure, including:**
  - Transport improvements, integrated water management and climate-responsive planning outcomes,
  - State Government funding for major infrastructure items such as:
    - Plan for Park and Ride stations away from the activity centres and operate an efficient bus shuttle.

- Introduce a low-cost train neighbourhood zone, 3-4 stops from the home station, to encourage public transport use to shop/visit/work. (e.g. Blackburn to Box Hill or Ringwood). Currently cheap parking encourages car trips to these destinations.
- Safe Crossings - Pedestrian/cycling crossing or an overpass on Whitehorse Road at Albert Street linking Blackburn Railway station with the North Blackburn residential area, Cootamundra walk, Shopping Centre, Sikh temple etc.
- Protected local active transport routes linked to a 'fit for purpose' principal bicycle network that provides safe commuter cycling to transport hubs and anticipates increased demand particularly 'E' bikes. Plans must align with [Victorian Cycling Strategy 2018-28](#).

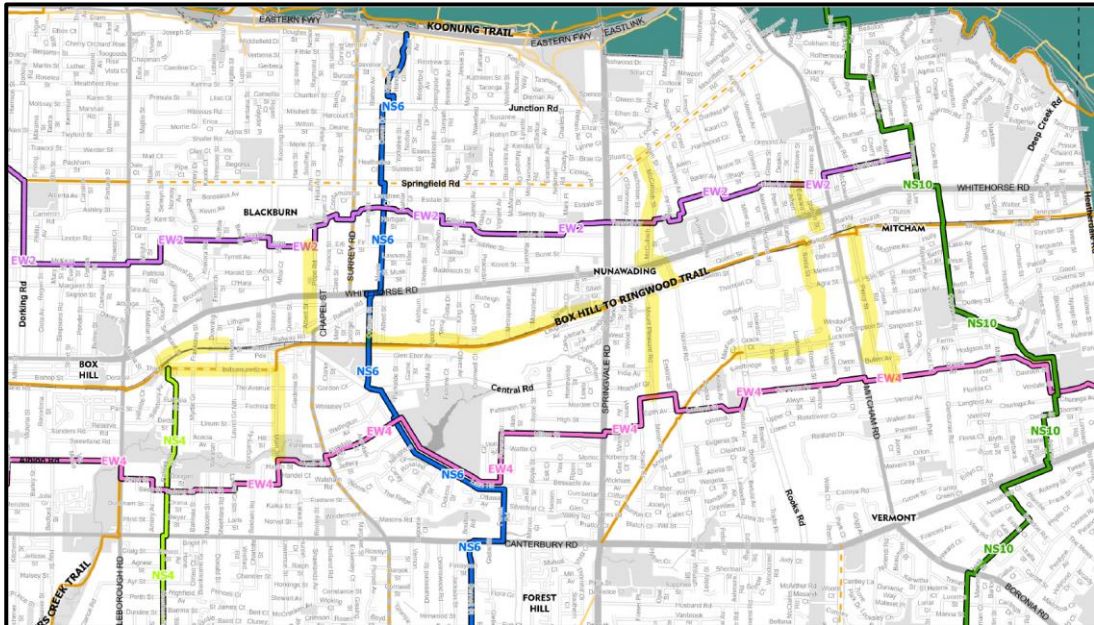


Figure 4. Whitehorse Easy Ride Network. Plus, additional links in Yellow. All need upgrades to make commuter cycling safe and friendly.<sup>4</sup>

**Safe protected active transport links (highlighted in yellow) are required:**

- North along rail corridor between Dowling and Sergeant Street linking them to Blackburn and Laburnum Stations.
  - North along rail corridor between Blackburn and Nunawading Stations linking to side streets – Cottage, Alfred, King, Metropolitan Ave, Moncrief and Varman.
  - Albert and Johns Street north of Blackburn Station.
  - Main street to Blackburn Station.
  - Laburnum Street joining Blackburn and Laburnum Station
  - Mount Pleasant Road to Nunawading Station
  - McCulloch Street, Harvey Norman Lane to Nunawading Station
  - Lucknow Street, Reservoir Lane, Agra and Simla Streets to Mitcham Station.
  - Edward and Station Streets to Mitcham Station.
  - Orient Ave, Creek Road, Bullen Ave, Percy Street to Mitcham station.
- **Improve pedestrian safety and accessibility through safe crossings over major roads and rail corridors.** Link and make safe walking and "active" access pathways connecting residential, commercial, industrial and public transport - particularly across major roads such as Whitehorse, Middleborough, Springvale, Mitcham and Blackburn Roads, all of which are major arterial roads that already have heavy traffic loads and will only become busier once NE Link is finished.

<sup>4</sup> Whitehorse City Council – Easy Ride routes - <https://www.whitehorse.vic.gov.au/media/17344>

- **Strengthen water-sensitive urban design and stormwater and litter management requirements.** Need to align with Melbourne Water new flood plans.
- **Retain adequate parking provisions within Activity Centre boundaries to support accessibility, safety and diverse community needs** and provide ease of access to traders and the commercial precinct.
- **Recognise and protect the values outside Activity Centres that will be put under pressure due to population increase** - particularly pressure on green space, outflow of lighting onto sensitive landscapes and wildlife, overflow parking requirements from both commuters and shoppers.
- **Improve "village" access/egress to enhance our community village(s)** - e.g. Blackburn's shopping precinct is split in half by road/railway line – consider Blackburn station redevelopment with residential and open space plaza above a lowered station.
- **Mitcham's Simpson Park needs to remain largely for passive recreation** – small value-adding activations such as seating, shade, a playground would be supported – not fencing around the oval or lighting, introduction of hard surfaces for sport etc, as any more than small changes will detract from the community's enjoyment of the passive nature of this park
- Overshadowing of the Esplanade Reserve on Whitehorse Road, Mitcham must be avoided. It abuts a potential 10 storey building on the west which would leave this park in shade for most of the afternoon.

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## 7. Liveability and Social Outcomes

The Activity Centre proposed plans/maps lack clear strategies for social housing delivery, family-appropriate housing and inclusive design. Developments comprising predominantly one- and two-bedroom apartments do not meet the needs of families or downsizers and will not support long-term community cohesion.

### Key Issues with current plans

- Uniform, "as-of-right" development outcomes prioritise efficiency over liveability.
- Insufficient emphasis on human-scale design at street level.
- Loss of mature trees, deep soil planting opportunities and canopy reduces walkability and thermal comfort.
- Limited housing diversity, particularly family-sized and ageing-in-place dwellings.
- Public realm quality is treated as secondary to development yield.
- Does not safeguard commercial and business potential. For example, the proposed residential towers along Whitehorse Road would replace significant businesses and employment.

### Quality Higher-density development should:

- Include a mix of dwelling types, including family-sized apartments and townhouses.
- Support ageing in place and long-term community stability.

- Respond to local context rather than applying uniform built form outcomes.
- Not cannibalise the centres business potential.

### Requested Changes

- **Mandate the delivery of a broad mix of dwelling types**, including family-sized apartments and townhouses.
- Facilitate the erection of **buildings that are sustainable** including 6\* efficiency - solar, water etc and incorporate interesting designs (not boxes wall-to-wall). Use less concrete and glass, more natural materials and expansive greenery.
- **Embed high quality public realm treatments** that enhance amenity for all:
  - Value, respect, preserve and enhance heritage/history/character.
  - Incorporate mandatory intergenerational and affordable/social housing requirements into all major developments to create vibrant and diverse neighbourhoods.
  - Prioritise high standard active transport connections.
  - Incorporate basic community needs into multi-storey developments - grocery stores, delis, cafes, medical centres etc. as well as enhanced community assets such as meeting places, libraries, senior citizens.
- Balance policy outcomes so that the **job creating commercial role is not cannibalised by residential development.**

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## 8. Governance, Process and Community Participation

Effective planning outcomes depend on meaningful local decision-making, community participation and accountability. Development certainty must be balanced with good design, local context and democratic process.

The proposed planning changes significantly reduce the role of local councils and remove third-party notice and appeal rights in many circumstances. This undermines community confidence in the planning system and reduces councils to an administrative role.

Both formal and informal feedback highlights that the community views this program's consultation process, including the current Phase 2, as being flawed, with significant limitations in engagement, transparency and collaboration required for such a large-scale unprecedented planning reform. Opportunities for Council and community to give feedback and participate have been tightly controlled.

Consultation was only 40 days for the public to review complex draft maps with changed zones, building heights, controls etc. While not providing the level of detail needed to analyse the assumptions and to make informed comment. The technical and complex materials were provided to council but not the community who will live with the consequences. This is wrong and unfair.

It has been standard practice that major planning amendments with a significant number of submissions are reviewed by a Planning Panel. That this important step is being excluded increases the chances of significant unintended consequences occurring.

## 9. Recommendations

CROWAG recommends that the Department of Transport and Planning Implement our requested changes:

1. Work in partnership with Whitehorse Council to implement Council's existing housing strategy.
2. Incorporate the many additional opportunities identified for development into the Activity Centre plans. These have been jointly identified by Council and community and if done in partnership would provide great urban renewal opportunities.
3. Rezoning some industrial areas to mixed use and expanding east and west along Whitehorse Road RGZ, distributing housing more evenly across the three activity centres designated HGI2.
4. Strengthen protections for existing tree canopy and remnant vegetation, in order to work towards achieving the joint state and council 30% target.
5. Reduce maximum core building height triggers to a more human-scaled liveable level, maximum of 8 storeys, and less where overshadowing has been identified as a problem.
6. Develop masterplans for large and sensitive sites and improve transitions to surrounding neighbourhoods, particularly incorporating adequate setbacks and solar-access protection.
7. Implement changes to catchment boundaries in order that our local environment, heritage and character are protected and maintained.
8. Introduce rules to enable a broader mix of dwelling types, built with sustainability front and centre, including affordable and family-sized housing.
9. Clearly identify and plan infrastructure to support proposed population increase BEFORE the development occurs so that all opportunities are identified and utilised and provide appropriate and quality amenity for the community.
10. Reinstate democratic third-party notification and appeal rights.
11. Allow consideration of plans and community feedback to be considered by a Planning Panel.

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## 10. Conclusion

Housing growth in Whitehorse can be delivered without sacrificing environmental integrity, heritage values or community trust. A collaborative infrastructure-led and locally responsive approach will better achieve State housing objectives while protecting the ecological, cultural and social assets that define Whitehorse as a liveable and sustainable municipality.