

## **Amanda McNeill Former Councillor and long-term Blackburn Resident**

As a passionate and proud resident with excellent knowledge and community connections, I am deeply concerned about the proposed Phase 2 Blackburn to Mitcham Activity Centre Plan.

My fears about the plan are numerous and varied and reflect the concerns of Whitehorse City Council, CROWAG, the Community Reference Group and many other Blackburn and Whitehorse residents that I have been in contact with.

I believe the following matters need to be comprehensively addressed by Government planners prior to any major decision and commitment to full-scale high-density development in the Blackburn to Mitcham Cluster in order to prevent major errors and possible long term negative social, business and community impacts.

### **1. EXISTING HERITAGE OVERLAYS**

Fragile and rare heritage buildings including historic sites such as Mitcham's former Post office and the Thomas street Precinct, ex-Council offices at 358-362 Whitehorse Rd, historic shop fronts in South Parade, Blackburn and key viewpoints to Nunawading's heritage chimney landmark, will be negatively impacted by the Activity Centre's high-rise developments. These historic buildings may be damaged by such large-scale developments while under construction. This is a risk that should not be taken.

Once completed the 12 Storey High rise buildings within the Shopping Villages of Blackburn and Nunawading will overshadow/overlook those properties, ruining their heritage values and creating an unattractive/mismatched landscape.

I can advise that there are heritage overlays at the following properties:

- 104-114 South Parade, Blackburn (original shops and precinct)
- 128 South Parade, Blackburn (Old Bank Building) is under Heritage investigation by Whitehorse City Council.

### **2. FLAWED AND RUSHED CONSULTATION PROCESS**

I believe the entire consultation process, including the current Phase 2 has many flaws including 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 often very technical and complex materials including analysing draft maps, building heights, controls etc. This is wrong and unfair.

### **The Community Reference Group (CRG)**

The Community Reference Group for Whitehorse is supposed to be a key method to give feedback on the proposals. Firstly, there are limitations in the selection of CRG members, given the expected time commitment, which prevents parents, elderly and/or disabled from being represented. Thus, any recommendations they give may not represent the local community they are meant to serve.

Notably no information has been given as yet by the CRG which is very concerning, given the gravity and importance of the task and feedback closes on Sunday 22<sup>nd</sup> March.

The CRG Process should have commenced at least a month prior to the public consultation, enabling CRG members enough time to fully understand the task at hand, the maps, and the Government policy involved and allow enough time to consult with the community to enable proper feedback to the government. Furthermore, all feedback provided should also go through an external independent body process of hearings and evaluation to ensure quality.

The CRG report and recommendations to the Department of Transport and Planning should be provided to the CRG members in writing and recommendations made public. This would ensure democracy, accountability and transparency.

There was an external process conducted for the SRL and the Activity Centre process should have also occurred in the same way.

### **Flawed drop-in sessions process**

The planning for these has been typically rushed and minimal. Three sessions in total, seeking information on detailed information, with little promotion, has resulted in limited public engagement in these sessions – particularly due to the overwhelming nature of the task required to understand and then be able to provide a cogent, reasoned rationale regarding concerns. Whitehorse City Council worked hard to fill the void and educate the community, helping residents provide feedback.

The first session was planned to occur 30 days into a 40-day consultation period, thereby preventing timely community engagement. Again, not good enough.

### **Online survey – Flawed design and lacking transparency**

It appears that the Online survey was either deliberately or accidentally flawed; in favour of positive responses due to largely closed questions, confusing ranking tables, no place specific

options and no rationale provided for the plans/maps disseminated. It does not meet the government's own community consultation standards. This meant that respondents could not provide feedback on local issues or locations. A real shame and seemingly undemocratic. As such, the results of the survey should not stand.

### **3. ROADS AND STREETS UNABLE TO HANDLE EXTRA CONGESTION.**

Feeder streets- eg. Main, Gardinia, Laburnum and South Parade do not have the capacity to handle the additional traffic that would be generated from 12 Storey Towers in South Parade Blackburn. Before any thought of an activity centre being placed in this location, a traffic survey needs to be completed and fully considered in the planning process so as to prevent a traffic and congestion nightmare.

### **4. BLACKBURN STATION ACCESS AND ACCESS TO SHOPPING PRECINCT**

Blackburn is divided along the train line that serves the current community and shopping precinct with long ramps, a poorly maintained underpass and poor lift access. The proposed increase in development and population within the Activity Centre provides the perfect opportunity for a new Plaza to be built over the railway line trench, from North to South, between Railway Road to South Parade to enable people to easily access the Station and the Shopping Centre and properly join the community. Without this, both the existing and future residents and business and community will struggle to access both the Station and the Blackburn precinct.

Rezoning to 12 and 16 storey towers in Blackburn Village will significantly compromise small Business due to expected state taxes, land rates and rental rate increases. The cost of redevelopment will be passed on meaning only the big corporate type businesses will be able to afford the high rents. Blackburn will lose its village community feel. Blackburn is a village and should not be turned into another CBD like Box Hill.

My visual observation to date is that once towers are build above, it is very difficult to fill the commercial areas below.

12 and 16 storey buildings will have a narrow interface between them and the residences that have been excluded from the Activity Centre due to the landscape overlays. The surrounding streets, including those with significant landscape overlays will experience over shadowing, overlooking and potential wind impacts.

## **5. WATER TABLE AND CONTAMINATION RISK**

The water table beneath the railway station needs to be urgently addressed as there is flooding that occurs in this area which needs to be addressed before any increase in traffic and can safely occur.

Under the library contamination arises from the former Petrol Station at 2-4 Central Road, which is on the corner of Central Road and Blackburn Road. The level crossing removal project 2015 disturbed this area and the problem spread while it was a Car Repair business. This limits potential for expansion of community facilities and desperately needed public open space.

Currently, in the Activity Centre plans, there are plans to build over this and the Blackburn Library.

These matters must be responsibly attended to *before* any new plans for this area can be considered.

## **6. INFRASTRUCTURE DEMAND INCREASE**

The land is simply not available to provide the necessary community infrastructure that this activity centre will greatly increase the need for.

Planning for the activity centre omits several pieces of important assessment, including the increased demands placed on necessary infrastructure and funding to ensure timely delivery of the open space, schools, health services and community services needed to support a growing community and ensure its health and vitality.

Community services such as Neighbourhood Houses, Library, Sports and Arts facilities, childcare and kindergartens, aged care and other services are important and without these being included in any planning process Council and other existing services will come under great strain and residents will miss out on these essential services. For this reason, Infrastructure provision is a key concern and a matter that must be addressed urgently.

### **Silver Grove site in Nunawading**

The Silver Grove site in Nunawading is a former Whitehorse Council Community Centre site and is next to the Nunawading station. It is currently locked up and vacant. It has one major constraint, being next to the Boral Concrete batching plant so part of the site has some significant limitations, however, part of this site could be rezoned with the support of the State Government to enable a mixed use of commercial, community and housing to be developed on the site. I strongly support Whitehorse City council's submission on this matter. It provides an opportunity to create multilevel housing with a mix of private, social and affordable housing along with Government services such

as a Community Centre, Neighbourhood House, indoor sports facilities or other community activities

## **7. EXISTING PUBLIC TRANSPORT SERVICES ARE INADEQUATE**

Current Public Transport for the Belgrave and Lilydale line has remained substantially unchanged since the 1990's and promises for increased services have not transpired. This is a major concern especially for peak hour travel as passenger numbers are expected to increase substantially. This must be addressed by providing extra services. Night and weekend services must also be addressed with a minimum 10 minute first to last train 7 days per week.

Blackburn to Mitcham still only get a 30-minute train service on Sundays. On weekdays during off peak, it's also 30 minutes.

Plans/maps also do not take into account vital safe walking and cycling connections particularly across major roads, rail corridors and in shopping precincts.

Reduced parking provision is also set to occur due to new government rules reducing requirement private car parks. This will disadvantage all residents but will hit our older and disabled residents and families particularly hard. This undermines both community safety and may also negatively impact on local business as people will not have much time to browse or shop.

## **8. EMERGENCY SERVICE VEHICLES ACCESS- FIRE RISK**

Emergency Services vehicle access to high rise structure fires are a major concern as the area will be greatly congested and especially when there is high rise accommodation. In the event of a high-rise fire evacuation can become very complex and evacuation needs to happen in a timely manner.

Specifically, Box Hill Fire Station Trucks that service the Blackburn area cannot use ladders any higher than six storey buildings in the event of a major high-rise fire.

This is a very serious issue and must be addressed urgently.

## **9. DRAINAGE OVERFLOW CONCERNS**

According to Whitehorse Council information...

***" The drainage assessment and mapping project has not been completed. Melbourne Water is preparing the information for Council and has advised that the conclusion of the review has been delayed.***

***As a general rule, development activity needs to consider a range of factors, including abatement of any drainage impact on the downstream system...”***

Clearly this matter has not been given the attention needed for the large increase in flows and storm water drainage that will occur as a result of the proposed high-rise developments.

## **10. SUPERMARKET NOT INCLUDED**

Where are plans for a new supermarket to get built?

Given 12 and 16 Storey apartments are proposed to be built and active transport being the priority, a large supermarket to serve a major increase in demand nearby is essential. Currently this is not in the plans. Let's ensure that any new residents have their essential grocery needs met. This is not rocket science!

## **11. NEW OUTCOME TO ALLOW HIGHER TOWERS IN THE NORTH- IMPLICATIONS?**

I note the outcome of the final plans for the 25 proposed Activity Centre's released this week. These final maps show that the height of the developments has increased from a maximum of 16 to 20 storeys. This is both a very contentious and very poor decision given Council's and Community feedback generally being against any increase in these towers to that level.

Does this mean that these changes could also occur in Blackburn to Mitcham next?

I understand the maximum height for Blackburn were increased due to removing the SLO's and shrinking the Activity Centre boundaries significantly.

## **SUMMARY AND FINAL COMMENTS**

I like many citizens understand the need for a substantial increase in housing supply; however, the proposed activity centre's planning guidelines and process overall is both flawed and rushed.

Any large-scale housing development must include adequate land availability, adequate underground resources, infrastructure to support and respect for local and Council views and

processes to ensure safety, liveability, the environment and existing business and current and future residents.

This is why we need to mandate integrated master-planning for the Activity Centres to ensure we include all of the services, utilities, facilities and resources required as well as catering for the local nuances that make our area, a home that we love.

Without these vital considerations we risk creating unhealthy environments at best. or ghettos at worst. The time to act is now. Let's do this right!!

Amanda McNeill