



Box Hill Brickworks Parkland

Suburban Rail Loop Authority
Melbourne 3001

engage.vic.gov.au/project/srl-east-structure-planning

WHITEHORSE PLANNING SCHEME AMENDMENT C255 SRL-EAST DRAFT STRUCTURE PLAN – BOX HILL

SUBMISSION

4 April 2025

Thank you for the opportunity to make this submission.

Our submission relates to Box Hill and the former Box Hill Brickworks site.

1.0 INTRODUCTION

We believe the draft structure plan and planning scheme amendment gives inadequate consideration to the future liveability of Box Hill, especially in terms of vital community infrastructure such as passive open space.

Specifically, the strategic planning response overlooks the opportunity offered by the Box Hill Brickworks site for a community/nature park within the heart of Box Hill.

While the draft structure plan and planning amendment entertains some new open space on the Brickworks site, the proposal is vague and lacking detail in the documentation.

2.0 BOX HILL BRICKWORKS SITE

The precinct core of Box Hill is within close walking distance to the Box Hill Brickworks site.

Central Box Hill has many high-rise residential towers and more planned. These provide much needed accommodation for Melbourne’s growing population but there is a pressing need for more passive open space.

The community’s vision for the site is of open space like many parks around Melbourne, where former quarries and landfill sites have been transformed into vibrant parkland.

Parks are not a luxury but essential for physical and mental wellbeing, vital for the environment and biodiversity as well as fostering community spirit and social connections.

The Brickworks site represents a generational opportunity to create a community/nature park for Box Hill.

It could become a cultural and social meeting point for the whole community. Pedestrian and cycling connections could converge on a green common and community hub around the heritage buildings and the lake and be a key destination point; a magnet for Box Hill.

The site combines the opportunity to increase tree canopy cover as well as enabling people to connect with nature and for passive outdoor enjoyment, in a high density urban environment. No other large space, so close to central Box Hill, can offer people this experience.



3.0 FORMER QUARRY/LANDFILL SITES AROUND MELBOURNE

The Box Hill Brickworks ceased production in 1988 and the landfill closed 25 years ago, in 1999.

There are many examples around Melbourne that have seen local councils and governments working together to convert former quarry/landfill sites into public open space. The following list is just a few of them that are, or about to be turned into, community parkland.

1. All Nations Park, Northcote (Map 30 G-8) Contemporary 13ha regional park created on the site of the former Northcote Regional Tip. The park opened in February 2002
2. Darebin Parklands, Alphington (Map 31 D-9) 33ha, once a tip site
3. Fritsch Holzer Park, Hawthorn (Map 45 G-12) Former Brickworks and Tip site, Rose Street, Hawthorn
4. Bayview Park, Narre Warren (Map 108 J-12)
5. 1001 Steps Park, Narre Warren former landfill site in Quarry Road
6. Karkarook Park, Heatherton (Map 78 E-7)
7. Sunshine Energy Park, Albion at 570A Ballarat Road (Map 26 E-9) Former City of Sunshine Tip
8. Newport Lakes Parkland, Newport (Map 55 G-3) Former quarry and landfill
9. Nepean Miniature Aerosport Assoc, Rosebud West (Map 169 F-6) in Truemans Road, former Shire of Flinders Tip
10. Farnsworth Avenue Park, Footscray (Map 42 B-2) Former City of Footscray Tip
11. Victory Road, Clarinda (Map 79 A-10) Former landfill site, 31ha converted into a community park
12. Elder Street South, Clarinda (Map 78 J-9) Former landfill being converted to nature park
13. Quarries Park, Ramsden Street Clifton Hill (Map 44 G-2) Quarry from the 1850s and landfill through the 1960-1970 period
14. 20 Wangara Road, Sandringham (Map 77 C-11) Former landfill being converted to park (public consultation stage)

4.0 DRAFT STRUCTURE PLAN FOR BOX HILL

The draft structure plan for Box Hill was released to the public on 3 March 2025, with the following image.



Figure 7 Artist impression of Box Hill in the future. Indicative for illustrative purposes

The extract below, from the previous image, shows the brickworks site with the appearance of green space and trees across the majority of the site and some new buildings on the west side of the site.



The draft planning scheme amendment (Am C255) released on 17 March 2025 is clearly inconsistent with the 3 March image (above) that has been used to promote outcomes to the public -in the structure plan, on social media and at public forums.

The Box Hill Brickworks site is listed as a strategic site in the draft structure plan, with development guidelines as follows (page 104):

Brickworks development guidelines

- New built form at the outer edges of the strategic site should provide a height transition to ensure a respectful transition in scale to surrounding residential areas.
- Significant new development should prepare an adaptive heritage reuse strategy to inform the redevelopment, reinterpretation and rejuvenation of existing heritage assets on the site.
- Development should sensitively frame existing Victorian Heritage Register heritage assets to retain important view lines, particularly from Surrey Park Lake, Federation Street and Surrey Drive.
- Accessible public open space that contributes to and connects with the broader public open space and movement network should be provided as part of a master planned development scheme.
- Built form associated with new development should provide a positive interface and a good level of amenity to Surrey Park and any new public open space.

- Provide an enhanced landscape interface with the Surrey Drive Linear Reserve, including enhanced canopy coverage and improved biodiversity connectivity.
- Enhance accessibility and permeability through the site, including an east-west active transport link that connects into the broader movement network.

In terms of open space there are general comments in the draft structure plan, such as (page 47):

While Box Hill has an existing range of open spaces that contribute to its liveability, there are gaps in the open space network that need to be addressed.

More open spaces with greater functionality will be needed within walking distance of higher density living.

This includes passive recreational spaces and spaces that provide facilities for young children.

5.0 OPEN SPACE TECHNICAL REPORT

The draft structure plan states that a suite of technical assessments informed preparation of the structure plan (page 13). The assessments cover a range of matters including open space.

The Open Space Technical Report was prepared by AJM Joint Venture for the Suburban Rail Loop Authority.

Section 11 of the report covers Box Hill.

The report states as follows (page 249):

The population in the Box Hill Structure Plan area is forecast to more than double (119 per cent) by 2041. This highlights the need to plan public open space to serve the future population.

The report describes existing open space in the Box Hill Structure Plan area and within the 1.6 km radius.

The report commences by describing the 19 open space areas within the structure plan area. Table 11.1 (page 250) lists them by type of open space and overall area in square metres.

The report finds there are 6 Linear Parks, 4 Sports Parks, 7 Community Parks and 2 Civic Spaces.

Comparing the overall areas we calculate the following: Linear Parks (3.6%), Sports Parks (63.2%), Community Parks (32.5%) and Civic Spaces 0.7%.

The open space technical report goes on to identify gaps in walkable access (400 metres) within the structure plan area. It identifies 3 main gaps, including the western section of the area, south of Whitehorse Road.

The report describes Box Hill Gardens as a prominent and high quality public open space within the structure plan area and ‘an essential open space in the precinct core’ and a great open space with a wide range of options for play, exercise and enjoying nature. (page 257).

The larger sports parks are described as well developed and well cared for and have higher quality ratings than many of the other open space areas.

The report states that ‘No landscape or nature parks are located in the Structure Plan Area, with Blacks Walk Reserve (a nature park) to the east’ (page 261).

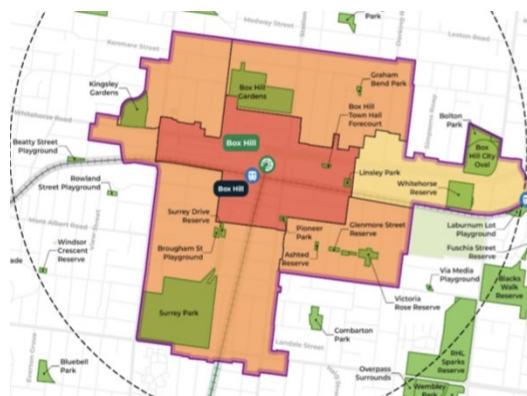
The report describes the challenges and opportunities to transition to high density areas. Table 11.11 (pages 264-265) makes the following comments:

- *The main challenge will be the declining level of public open space provision as the population increases, and that this may be perceived as being detrimental to future liveability within the SRL East Structure Plan Areas*
- *There are opportunities to explore innovative ways to deliver new public open spaces to balance the decrease in open space provision ratios. Improvements in access, quality and diversity of existing public open spaces will assist in maintaining liveability within the SRL East Structure Plan Areas*
- *The challenge is to provide a suitably diverse and well distributed mix of public open spaces within the Structure Plan Area, across both the primary function and classification hierarchies*
- *For the Box Hill Structure Plan Area there are no landscape or nature parks*
- *The opportunity is to draw on the wider public open space network across the 1.6 km station radius, which does provide a landscape park (Box Hill Crescent Reserve) and a nature park (Blacks Walk Reserve).*

Section 11.3.2 (page 268) refers to feedback from Whitehorse City Council which draws attention (among other things) to the importance of investment in new public open spaces to ensure provision for future population is provided, opportunities for green elements and creating links across Box Hill and consideration of the future role for the former Brickworks site.

Section 11.3.3 states that the highest projected density is centred around the SRL station core.

In this area a ‘200 metre-walkable access to public open space becomes a desirable benchmark where possible’ (page 268).



Section 11.3.7.1 (page 273) refers to the diminishing proportion of open space as the population increases, citing the present figure of 26.5 square metres/person reducing to 12.1 square metres/person by 2041 (the forecast year when the population of Box Hill will have more than doubled).

Section 11.4.5.2 (page 283) discusses ‘*Creating New Open Space*’ and ‘*potential sites and locations for innovation in creating new open spaces subject to detailed design, funding and maintenance considerations.*’

The former Box Hill Brickworks site is listed as one such potential site.

6.0 WHITEHORSE PLANNING SCHEME AMENDMENT C255

Amendment C255 places the Box Hill Brickworks site in the Precinct Zone with Schedule 5 to the zone being specific to the site.

The Environment Audit Overlay and Heritage Overlay remain.

There is no new permanent open space under the amendment ie. no new land is proposed to be zoned Public Park & Recreation Zone (PPRZ).

Clause 37.10-2 of the Precinct Zone states that *a schedule to this zone must contain a use and development framework plan for the land to which the schedule applies.*

It further states that a use and development plan may:

- Identify land to which outcomes, standards, provisions and requirements contained in a schedule to this zone apply
- Include information that supports, or shows the spatial application of, the statement of role, or any use and development objectives, contained in a schedule to this zone
- Identify existing and proposed public and active transport infrastructure
- Show any other features or information related to existing and potential future use and development of land to which the schedule applies

Schedule 5 to Clause 37.10 (Precinct Zone) is headed *Box Hill Suburban Rail Loop East Structure Plan Area: Former Box Hill Brickworks*. Section 1.0 of this schedule is as follows:

1.0 Role of the precinct

The former Box Hill Brickworks site (shown on Map 1) is an identified strategic site within the Box Hill Suburban Rail Loop (SRL) East Structure Plan Area and is supported for medium to high built form scale residential development, new open space and enhanced neighbourhood connectivity. Redevelopment of the site will deliver more convenient connections for pedestrians and cyclists through the new neighbourhood, to nearby public open spaces and to the SRL Station at Box Hill and Box Hill metro station(our underlining)

A ‘Use and development framework plan’ is Map 1 to Schedule 5 as shown below.

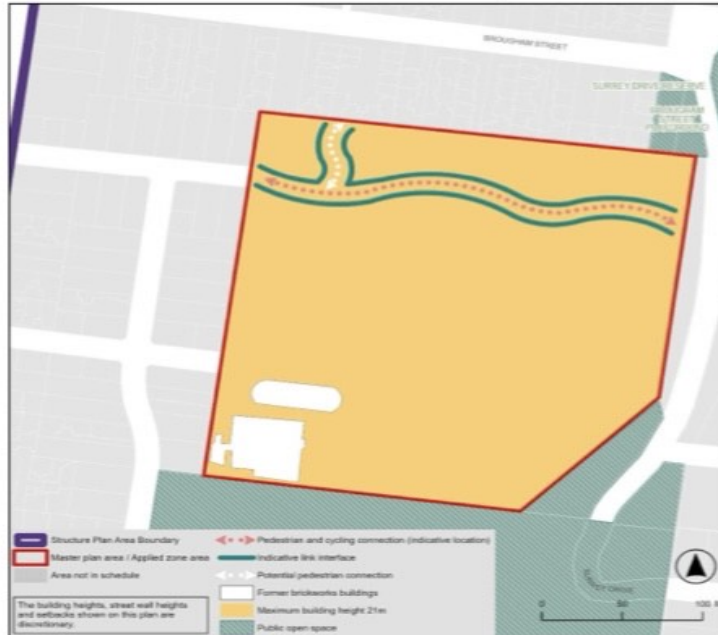
The Framework plan shades the whole site in yellow, with an outline of the Brickwork buildings in white and delineation of an east-west pedestrian and cycling connection.

The **Role of the Precinct** refers to two distinct land uses: residential development and new open space. The ‘Use and development framework plan’ is silent on the ‘new open space’.

The legend has yellow shading: *Maximum building height 21m* with a note to the effect that: *The building heights, street wall height and setbacks shown on this plan are discretionary*.

3.0 Use and development framework plan

Map 1 to Schedule 5 to Clause 37.10: Use and development framework plan



Schedule 5 provides scope to increase building heights through ‘public benefit uplift’.

7.0 SITE CONDITIONS

Schedule 5 sets the maximum building height at 21 metres (6 storeys) which could see apartment buildings across the site, possibly of 6-8 storeys (or more) after applying a development bonus (for *affordable housing, public realm works, public open space, strategic land uses or any other works, services or facilities that benefit the community living in, working in or visiting the precinct*).

However the planning scheme amendment (and draft structure plan) does not appear to directly address the site conditions with respect to the former quarry and landfill, notwithstanding the Environment Audit Overlay (EAO), which manages contamination issues.

The planning controls must surely cover development risks associated with possible ground movement, especially for development of apartment buildings on top of the former quarry/landfill.

Could there be issues with potential landslip as the former walls of the quarry become unstable, and/or with sinking of the ground across the landfill area, as the site further settles under excessive loading from large building structures?

Is there likely to be differential settlement across the site and potential damage to the landfill cap?

There could be damage to buildings, infrastructure and the environment. How do the proposed planning controls address these issues?

Section 60 (1) (e) of the Planning & Environment Act 1987 requires a planning authority, in this case the Suburban Rail Loop Authority, when preparing an amendment to the planning scheme to take into account any significant effects that a rezoning might have on the environment and, conversely, any significant effects the environment might have on a proposed use or development, such as housing.

This would apply to both active and closed landfills.

8.0 THE STRUCTURE OF THE PLANNING SCHEME AMENDMENT

We note the preparation of the planning scheme amendment has been undertaken by the Suburban Rail Loop Authority with advice from Urbis and others.

Urbis has expressed the following overview of that process (Urbis website 19 March 2025):

Providing certainty and encouraging investment have been key drivers in developing the new planning controls, which represent a thoughtful and well resolved approach to guide positive development activity in the precincts.

The controls will embed a higher level of certainty for developers than has occurred in precinct planning exercises in the past, with widespread use of 'deemed to comply' provisions, exemptions from public notice and opportunities for development uplift that are not yet found in any other precinct context in Victoria.

From the above, it appears the focus in framing the planning controls has been on providing certainty for developers, implementing clear pathways that avoid the need for a planning permit, avoiding public consultation and providing development bonuses (eg. increased building heights) in return for social and affordable housing and other matters.

What seems to be missing is a focus on improved liveability for the people, as the population grows, and providing reasonable certainty around key community infrastructure such as public open space outcomes for the Box Hill Brickworks site.

While the notion of new open space on the site is listed as a potential outcome, the size, location and form of that possible space is vague and ill defined.

We believe the outcome for the Brickworks site is critical to the future of Box Hill and must be better defined through this strategic planning exercise.

We therefore submit the following contextual analysis and principles to assist in reaching that point.

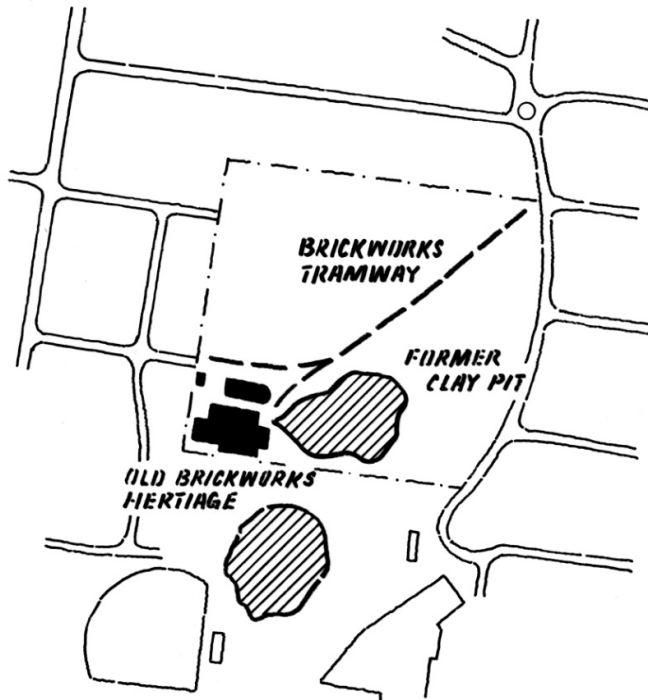
Key parameters offering reasonable certainty can and must, in our view, be settled through this process.

9.0 BOX HILL BRICKWORKS SITE – KEY PRINCIPLES

The attached sequence of three slides (Appendix to this submission) has been prepared by Benjamin Lau, Architect and summarises his analysis, informed by the site context, landscape and heritage.

The context and some history of the site and surrounds is briefly summarised as follows:

- Surrey Dive, now an ornamental lake, was the original clay pit for the brick works. The clay pit was closed in 1906 around the time when the existing brickwork buildings were constructed
- Surrey Dive then became Box Hill's famous swimming hole up until 1968. It hosted carnivals featuring brass bands and high diving displays and became one of the first Olympic standard swimming venues
- Surrey Dive lake and surrounds was extensively landscaped in the 1980s and is a public attraction today as well as being home to the Surrey Park Model Boat Club
- Box Hill Brickworks operated between 1884 and 1988 and included a Hoffman Kiln built in 1913 and located in the south-west corner of the site
- The Brickworks is of state significance and listed on the Victorian Heritage Register (VHR) No. H720
- Around 1920 a rail link was constructed via Thurston Street to the Box Hill rail yards
- The tramway/rail link originally followed an alignment diagonally across the site from the brickwork buildings to Thurston Street, near the present Brougham Street roundabout, and on to the rail yards. This is shown on earlier MMBW detail plans.



We support the above analysis, elaborated on in the accompanying appendix (3 pages).

10.0 CONCLUSION

- A. We submit that planning controls for the Brickworks site must set aside a significant proportion of the site to passive open space. This should involve appropriate revisions to Schedule 5 that include the conceptual delineation of the new open space on Map 1 (Use and development framework plan). This should be guided by the analysis provided in this submission.
- B. We set out in summary the strong justification for significant passive open space at the Box Hill Brickworks site:
- The Brickworks site is within 200 metres walking distance from the precinct core of Box Hill. This is the ‘walkability’ benchmark for high-density housing to open space, adopted in technical assessments accompanying the Box Hill structure plan;
 - The Brickworks site is the only greenfield expanse remaining in central Box Hill and sits in a comparable position to Box Hill Gardens, but on the south side of the precinct core;
 - The Open Space Technical Assessment recognises the need for more passive open space and the absence within the Box Hill structure plan area of a community/nature park;
 - There are acknowledged gaps in the open space network, especially within walking distance of higher density living. This includes passive recreational spaces and facilities for young children and open spaces with broader functionality;
 - The planning scheme amendment provides no new zoned open space in Box Hill, under the Public Park & Recreation Zone (PPRZ);
 - The densification of Box Hill and the forecast population growth means there will be unprecedented demand on open space in central Box Hill. This will be keenly felt by residents in high density and high-rise housing, for community connections and health and well being;
 - Box Hill Gardens is intensively used at present and demonstrates the need for more passive open space with a projected doubling of the population over the next 15 years. On any given day people can be seen practicing Tai Chi and playing musical instruments alongside walkers and joggers, children, parents, health workers and dog-walkers; it is such a busy haven throughout the day. The Gardens will, of course, be impacted for the best part of a decade as the new rail line and station is established;
 - The removal of canopy trees within the project area including within Box Hill Gardens and in the Whitehorse Road median, also plays into the need for large open spaces, such as the Brickworks site, to contribute to tree canopy, biodiversity and greening of the precinct;
 - The structure plan notes that high-density areas with low tree canopy coverage are especially vulnerable to the impacts of the heat island effect. These urban heat impacts can create uncomfortable environments and considerable health issues for people. A significant green space such as the Brickworks site could make a significant contribution to mitigating the impacts of this heat island effect;
 - In terms of its history, brick production ceased in 1988 and the landfill was closed 25 years ago and environmental audits deem the site suitable for recreational open space;
 - The site has unlimited potential as a passive recreation space; a community park and nature reserve for Box Hill, to meet the diverse interests of people of all ages and cultures;

- In 2024 Vicinity Centres Pty Ltd obtained approval to construct seven high-rise towers on a large site in central Box Hill. This approval sets aside land to facilitate a pedestrian/cycle link over the railway line between Nelson Road and Thurston Street. This would provide an important link, a corridor to many amenities in Box Hill on both the north and south sides of the railway reserve including to passive open space at the Brickworks site. E-W and N-S pedestrian and cycling pathways could converge at such a destination point and continue on to the Gardiners Creek network as well as along the Box Hill – Hawthorn trail;
- Surrey Dive provides a physical asset, a landscape setting and natural ambience to merge with the Brickworks site;
- Existing heritage buildings offer potential for complementary community/commercial uses such as an arts/cultural centre and café; and
- Creation of such a central community park, within one of Melbourne’s most densely settled metropolitan activity centres, is a generational opportunity that could be civic defining for Box Hill.

APPENDIX (next pages)

Contact:

Vincent Mennilli JP & Greg Buchanan

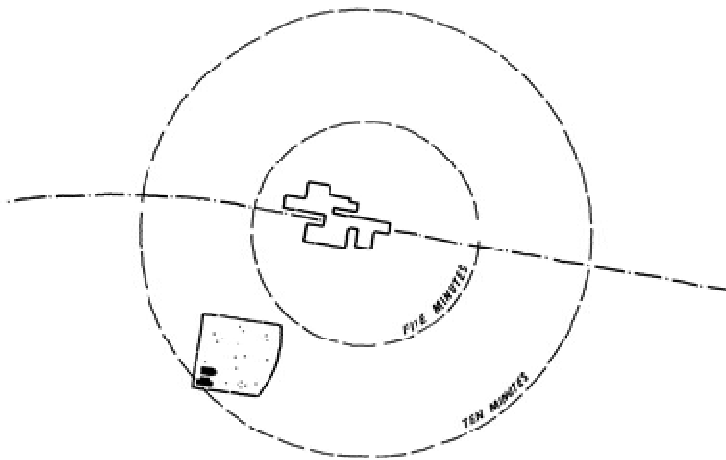
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APPENDIX: BOX HILL BRICKWORKS PARKLAND

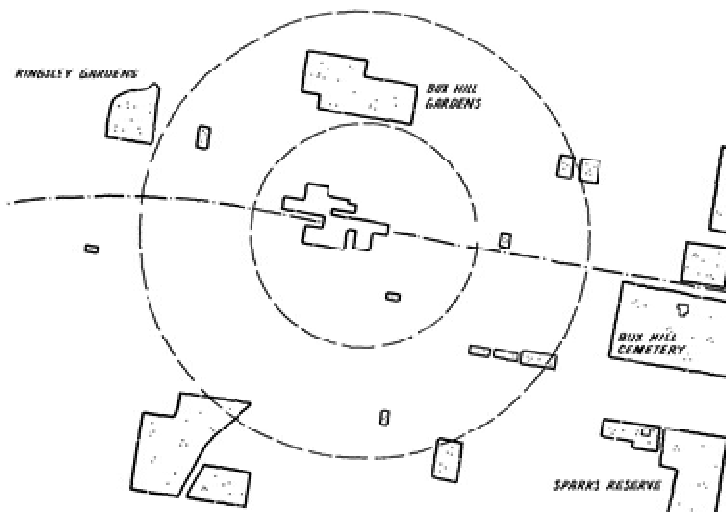
PART A: BOX HILL BRICKWORKS – CONTEXT

Within the heart of Box Hill



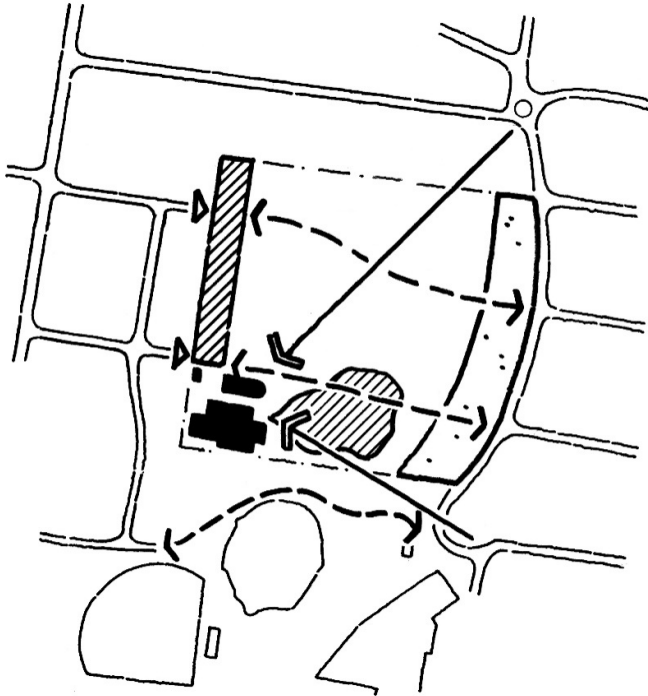
Box Hill Brickworks site is located in close proximity to the precinct core.

Existing Open Spaces



Presently, most of the significant open spaces are located outside the 10-minute catchment zone. These include Kingsley Gardens, Surrey Park, Box Hill Cemetery, and Sparks Reserve. Box Hill Gardens is the only landscape park at the core of Box Hill.

PART B: DESIGN PRINCIPLES



In summary, a number of Design Principles respond to various urban aspects of the site and provide strategic directions.

Proposition 1 highlights the importance of maintaining the present street character of Surrey Drive.

Proposition 2 celebrates the cultural value of the local heritage by protecting the existing urban vista from near the Brougham Street roundabout and Surrey Drive to the Box Hill Brickworks heritage buildings.

Proposition 3 improves urban connectivity and encourages pedestrian movement across the site.

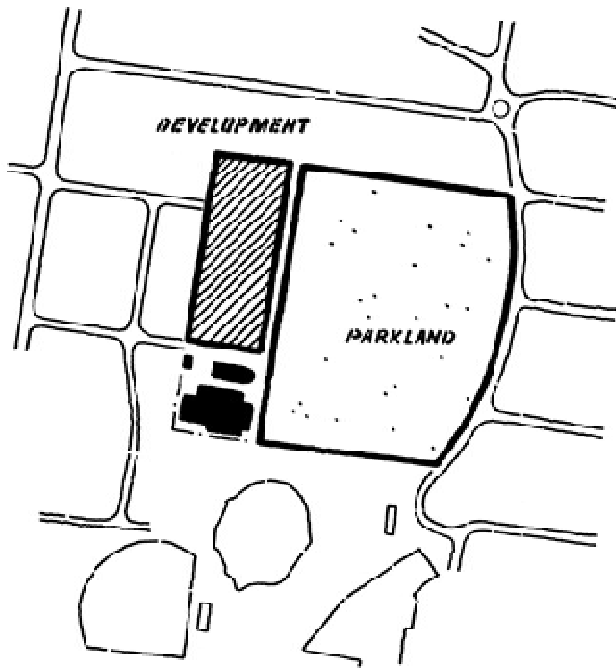
Proposition 4 promotes the Box Hill Brickworks' rich layers of history as design inspirations including the environs of the Surrey Drive lake and landscape.

Proposition 5 identifies the development access points on the western side of the site, to Federation Street and Mont Albert Road.

Proposition 6 expresses design opportunities for new buildings facing community parkland, with built form and materiality responding to the robust form and detail of the brickwork buildings. Potential shadowing of the open space is managed.

PART C: LAND USE SCENARIOS

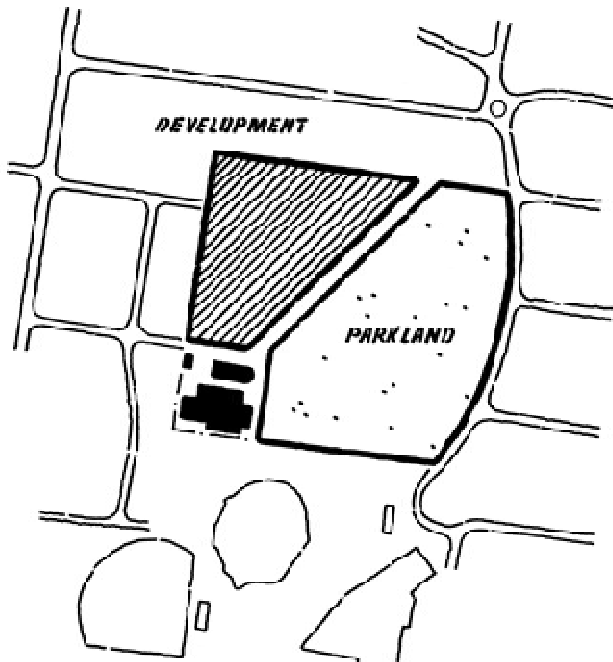
Parkland and Development Zone (Scenario 1)



This diagram demarcates the proposed parkland and the future development area according to the 'Artist impression of Box Hill in the future' perspective drawing on P.30 of the SRL East Draft Structure Plan document.

In this scenario, the propositions outlined in Part B are fulfilled.

Parkland and Development Zone (Scenario 2)



This diagram shows the demarcation of the proposed parkland and the future development area based on the propositions outlined in Part B.