

Submission on the Activity Centres Program - Tranche 2 (Ashburton and Riversdale-Willison) – Phase 1 Consultation

City of Boroondara

20 November 2025

Acknowledgement of Traditional Owners

The City of Boroondara acknowledges the Wurundjeri Woi-wurrung people as the Traditional Owners and original custodians of this land, and we pay our respects to their Elders past and present.

1. Introduction

The City of Boroondara welcomes the opportunity to provide feedback on Phase 1 of community engagement on Tranche 2 of the expanded Activity Centres Program (ACP), which includes two further locations within Boroondara: Ashburton and Riversdale-Willison stations.

Council looks forward to continued engagement with the Minister for Planning and the Department of Transport and Planning (DTP), to establish a common understanding of place and what are most important considerations in planning for these centres.

2. Background

The ACP was initially announced as part of the Victorian Government's Housing Statement in September 2023. The program commenced with a pilot of 10 activity centres, including Camberwell Junction Activity Centre.

Council was well placed to respond to the Camberwell Junction pilot, as it had substantially progressed preparation of the Camberwell Junction Structure and Place Plan over a two-year period. Following extensive analysis and consultation with the local and broader community, Council adopted the final Plan in March 2024. DTP recognised the value of Council's work and leveraged the social license for change that Council had built. Ultimately Council's planning formed the strategic basis for the Camberwell Activity Centre Plan and application of the Built Form Overlay to the commercial core (Amendment GC252).

Tranche 1 of the expanded Activity Centres Program (ACP) includes four further centres in Boroondara: Kew Junction, Hawthorn, Glenferrie and Auburn. The three connected centres of Hawthorn, Glenferrie and Auburn were considered as a whole, referred to as 'the Corridor'. Consultation on Tranche 1 of centres has now progressed through Phase 2.

For Tranche 2 of the ACP program, which includes Ashburton and Riversdale-Willison, DTP commenced Phase 1 consultation on 20 October 2025 with a closing date of 30 November 2025.

The intent of DTP's Phase 1 consultation is to hear from local residents, traders, Council and other stakeholders on how to improve access to housing and enhance key elements of the centres.

Information provided by DTP to date has indicated that Riversdale-Willison is to be planned for modest densification and height increases through the application of the Housing Choice and Transport Zone (HCTZ), with no intensified 'activity centre'. Ashburton, which is an activity centre, will be planned for higher development around the central commercial core, and the application of the HCTZ to surrounding residential areas.

3. Boroondara Submission

3.1. General comments

Council reiterates its support of the policy objective of facilitating new housing, particularly more diverse and affordable housing at higher densities, in appropriate locations well serviced by transport, services and opportunities. Council has stated this publicly on many occasions.

The Phase 1 engagement survey is structured and aimed more at individuals living, visiting or working in these centres and surrounding areas. It is not well-suited for Council to respond to each question. Accordingly, Council has prepared this separate submission to provide insight into the important considerations when planning for these centres. These issues include:

- The inclusion of Riversdale-Willison Stations in the ACP
- The need for context informed boundary setting
- The need for improved active and public transport infrastructure
- The need to protect and expand the economic role of Ashburton
- The inclusion of PUZ land in Ashburton in the BFO
- Respect for heritage areas and valuing character
- The need for genuine, receptive consultation

In addition to these concerns, Council refers to its previous submissions - including the Tranche 1 Phase 1 and 2 consultation submissions - and the overarching issues raised in those which remain relevant for Tranche 2, including:

- The need for contextualised, local planning

Council does not support the generic typology-based approach to planning and considers it a major flaw in the program methodology as discussed in detail in those previous submissions. Place-based planning will ensure the potential of individual centres is optimised while recognising their unique qualities and opportunities. A place-based approach should be at the core of and the starting point for activity centre planning.

- Protection of trees

Established vegetation is one of the key features of our residential areas, particularly those around the two centres included in Tranche 2. Mature private gardens and street trees create a distinctive, shaded residential character. It is also critical in supporting biodiversity and mitigating urban heat in our suburbs. Boroondara is committed to a 30% tree canopy target consistent with Plan for Victoria. Achieving this requires expanding canopy on both private and public land. The planning for growth and density needs to reconcile the requirement for increased canopy with the inevitable removal of

mature vegetation for development and the very low canopy requirements placed on new development through planning controls.

- Affordable housing (including social housing)

Council strongly supports the objective to increase affordable housing provision. Without stronger or mandatory provisions such as inclusionary zoning, which could ensure a percentage of new developments are set aside for affordable housing, planning controls to facilitate housing development are unlikely to effectively alleviate the affordable housing crisis.

- The need for infrastructure investment to accompany housing

The scale of housing growth anticipated cannot be allowed to happen without corresponding investment in local infrastructure and public realm to service the future population around these locations. For this, a simple contributions system is required that delivers adequate funding to Councils to enable infrastructure provision including acquiring land as required. To date, little information has been released that gives confidence that the system that is being developed will be comprehensive, adequate or provide for infrastructure to be delivered in advance of growth.

3.2. The inclusion of Riversdale-Willison

Council submits that the inclusion of Riverdale-Willison is inconsistent with the underlying rationale of Activity Centres Program - they are not activity centres. While there are tram and infrequent train connections to Camberwell Junction, these are not “turn-up and go” services and the distances are not considered walkable. The inclusion of Riversdale-Willison extends the Camberwell Junction catchment creating a significant bloat to what is already a very large activity centre catchment.

Within the Riversdale-Willison Planning Investigation Area (PIA) there are very limited opportunities for increased housing based on DTP’s own criteria of down scaling change in heritage areas and adjacent incompatible land-uses - in this case the waste transfer facility. It is entirely unclear how DTP has prioritised Riversdale-Willison as a centre in the ACP.

The core aim of the ACP is to facilitate more housing. Places that have more medium and larger opportunity sites, greater existing services and amenities and fewer encumbrances will not only be able to house more people, they can do it better, more feasibly and attract the investment from the private sector needed to actually deliver the requisite construction.

Council has local knowledge of opportunities where more housing can be appropriately delivered and better serviced. Boroondara has places that are more logical and have more potential than Riversdale-Willison for enhanced planning controls.

Meaningful consultation with Council prior to the commencement of the ACP could have identified this, rather than now directing limited resources inefficiently and inappropriately towards Riversdale-Willison.

3.3. The need for context informed boundary setting

The PIA is presented as the area within which planning changes are being considered. It is understood to be based on walkable access and logical barriers/edges, and may be larger than the final catchments. The process and methodology for setting the PIA is unclear and the rationale for the boundary position seems to be inconsistent between and within centres.

To date, DTP have been unable to coherently explain the criteria/methodology used to determine the PIA or catchments and how this has been applied in a consistent way. In Tranche 1 DTP repeatedly referenced an Access to Opportunities and Services (ATOS) tool as being used to determine catchments. Council requests the ATOS assessment and assumptions that has informed the PIA and that will be used to determine the catchment.

While the PIA boundary is defined as a physical limit, Council believes that planning investigations need to consider wider context and influences that will shape development and liveability. This is essential for DTP to carry out proper and orderly planning.

In Ashburton there is inconsistency and no apparent logic as to why the PIA extends further in some directions from the activity centre core and station than it does in other directions. As discussed above, there is no logic to Riversdale-Willison being included as they are train stations not activity centres, but if the same logic was carried to Ashburton, the PIA would extend around Alamein.

Examples of the lack of contextual analysis and State Government coordination in planning include:

- The HomesVic Alamein Avenue and Ambon Street Housing renewal project. The PIA boundary bisects this housing renewal project site. This project could be a demonstration of density done well and an example of the sort of high quality, higher density and diverse housing outcomes that the ACP is seeking. It is a missed opportunity to coordinate and integrate government planning and delivery.
- The obvious potential and likely future project to remove level crossings on Riversdale Road and Prospect Hill Road. It is reasonable to expect that this will consider combining Riversdale and Willison Stations, as well as having complex spatial and land requirements. A future level crossing removal will fundamentally change the urban structure, movement patterns and areas of intensity, and needs to be considered and provisioned for in any planning.

- The Council Waste and Recycling facility which is central to the Riversdale-Willison PIA. This use is a constraint on high amenity residential development. It is incomprehensible that DTP would not engage with Council about the operations and any future intentions for this site.

Council can contribute considerable value to the ACP if DTP engages and collaborates with Council and harnesses its local contextual knowledge.

3.4. The need for improved active and public transport infrastructure

Improving cycling and pedestrian connections is essential to enhance safety, accessibility, and encourage sustainable transport choices. Council is aware that the Victorian Government has allocated funding for works in Ashburton around the Anniversary Trail, and we invite collaboration to deliver upgrades to cycle paths and crossings.

In addition, we propose investigating opportunities to strengthen key linkages across the wider area, including active transport connections to the recreation precinct and Alamein Station, ensuring a more integrated and user-friendly network for all.

While Ashburton is centred around a metro station, the level of rail service provided needs to be considered.

Carnegie - an activity centre the same distance from Melbourne's CBD - typically takes around 16 minutes to reach the city by train. Trains currently run around every 5 mins in peak hour, likely improving once the metro tunnel opens.

Ashburton takes 25 minutes to reach from the city, outside of peak times requires a transfer at Camberwell, and runs **only every 20 minutes** during peak times. This is due to single track section of the Alamein line, an indirect route and no meaningful capacity to add more services that would need to share tracks with mainline services between Camberwell and the city.

The bus route bisecting Ashburton, connecting to Glen Iris station (west) and Glen Waverley station (east) is Route 734, which currently runs every 20 minutes in peak times, and every 30 minutes in other times. On weekends, it runs hourly.

To meaningfully house more people and create more jobs in Ashburton without causing significant impost on the local road network, public and active transport upgrades need to be prioritised including upgrading the Alamein line and running more services along route 734 bus.

3.5. The need to protect and expand the economic role of Ashburton

Council understands that activity centres are places to work, shop, access services, connect to public transport and participate in urban life. They are central to the efficient functioning of a polycentric city and are the anchor for 20 minute neighbourhoods. The

ACP has a narrow focus on housing delivery which neglects and ignores the crucial economic and social role that activity centres play within our urban fabric. The ACP needs to give at least equal attention to non-residential land-use and development, and to growing the activity centre functions necessary to properly service housing growth.

Council agrees that new homes are needed close to jobs, services and transport. Equally new jobs and opportunities, and transport improvements are needed close to where people live. We recognise that housing plays an important role in supporting economic functions, however by prioritising housing above all else, the Victorian Government risks limiting opportunities for economic activities to service the growing residential population. At worst, increased pressure to deliver housing could risk displacing existing businesses and jobs, leading to a reduction in economic activity and community vibrancy, and diminishing the activity centres.

Focussing solely on housing not only affects the economic stability but also exacerbates issues such as increased commuting times and reduced access to essential services.

The lack of a cohesive planning strategy for the train and tram zone activity centres that integrates housing with commensurate growth in economic and social infrastructure could result in long-term negative impacts on community development and sustainability.

3.6. The inclusion of PUZ land in Ashburton in the BFO

While Council supports the application of the Built Form Overlay (BFO) to the current commercial core area of Ashburton, we note that there are some practical limitations that dissuade greater densities and heights in that area. These include solar considerations, lot size and fragmentation and a desire to maintain a fine urban grain.

Council considers that there is potential merit to include PUZ land directly adjacent to the commercial zoned land in the BFO. In particular, PUZ sites to the north of the Ashburton core (Marquis Street car parks) have the potential to be catalysts for growing and reimaging Ashburton's commercial core.

Council would support their inclusion in the BFO, provided Council maintains control of master planning future change and drafting the appropriate BFO schedule. While they may not meet the size threshold generally used in the ACP to identify masterplan sites, their attributes and opportunities make them an ideal candidate for a masterplan exercise by Council in the future. Council would not support the inclusion of these sites within the BFO on the basis of any precinct typology that predetermined the development controls or a generic BFO schedule.

3.7. Respect for heritage areas and valuing character

The Ashburton commercial core is not in the Heritage Overlay but it has sections of older fine grain shopfronts which contribute significantly the character of the High Street. This is considered to add value and should be respected. Having no formal heritage status should

not prevent parts of the street from being considered heritage main street in a typology and character sense.

The south western quarter of the Planning Investigation Area is predominantly in the Heritage Overlay including the Great Glen Iris Railway Junction Estate Precinct (HO227), as well as scattered individual sites, retain heritage significance.



Image 1: Extent of Heritage Overlays in the Planning Investigation Area (Ashburton)

Around Riversdale and Willison stations, there are many areas of heritage significance, particularly the Matlock Street Precinct (HO701), Hassett's Estate Precinct (HO191) and the Harley Estate and Environs Precinct (HO735). The areas affected by the Heritage Overlay shown below.

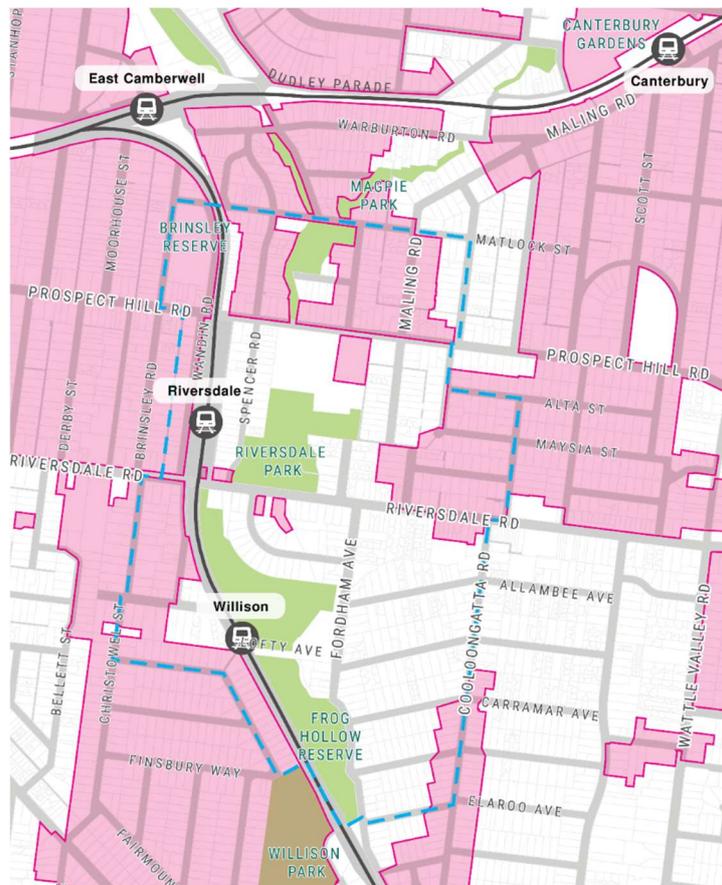


Image 2: Extent of Heritage Overlays in the Planning Investigation Area (Riversdale-Willison)

Council maintains the independent expert advice of the Activity Centre Standing Advisory Committee for the ACP Pilot, that the catchment should not extend over heritage overlay, areas should be adopted. Council remains of the view that the potential for housing growth in heritage areas is best managed with existing zones. The Housing Choice and Transport Zone (HCTZ) is not appropriate for heritage areas. The PIA for Riversdale-Willison is especially encumbered by heritage, with 38% of homes included in the Heritage Overlay.

The statements by the ACP that it is not making any changes to heritage policies or controls is confusing for the community and disingenuous in the context of the ACP being part the broad Victorian Government planning reforms.

The purpose of the HCTZ (the overarching planning control) does not allow for a consideration of character or heritage. In decision making this means less weight is afforded to heritage considerations.

This conflict has not been adequately addressed or resolved so the HCTZ as gazetted establishes the conditions for contestation of decisions. The uncertainty will lead to important planning direction around this matter being dictated by VCAT decisions and potentially the Supreme Court. It does not provide clarity or certainty to anyone (as claimed by the Victorian Government) and is therefore in conflict with the Objectives of Planning and Environment Act. Boroondara will continue to advocate for this issue to be

examined and is ready to assist DTP in development of clear guidance for how applications involving heritage in the HCTZ are to be assessed.

3.8. The need for genuine, receptive engagement

To-date, as with Tranche 1, DTPs consultation and engagement with Council and the community has been poor and is not building trust in the planning process or social license for planning change. Shortcomings, include:

- No collaboration in identifying the centres for inclusion in the ACP resulting in DTP using resources to plan centres with little opportunity to meet the objectives of the program and missing out on Councils local knowledge of opportunity areas.
- DTP not providing materials in advance to Council and not allowing officers take away or copy/photograph plans being presented for us to engage with a comment on, preventing accurate recall and undermining our ability to provide valuable contributions.
- Council officers being asked to provide feedback on plans which have almost no meaningful detail and where the rationale cannot be explained by DTP officers.
- Council officers being asked to provide detailed feedback in very short timeframes.
- Council being notified of Phase 1 consultation commencement on the day of commencement (20 October) - the community was notified days earlier via a social media post from a local MP.
- Reported late communication / poor coverage and generic notification of consultation events.
- DTP undertaking site visits to understand place without Council officers thereby missing an opportunity to develop a shared understanding of place.
- Closing off and removing links to online events several hours prior to event commencement.

Council continues to advocate for greater involvement in the Activity Centres Program and is ready, willing and able to plan for delivery of more housing. We have valuable knowledge and local planning expertise which can only help deliver the best possible outcomes for our community, and the wider metropolitan area. If collaboration with Council and the community is something that DTP genuinely values, this should be reflected in substantive engagement with our officers in a respectful, trusting, and transparent way. This has not occurred to-date.

4. Conclusion

Thank you for the opportunity to provide feedback into Phase 1 consultation for the Activity Centres Program as it relates to Tranche 2 (Ashburton and Riversdale-Willison), highlighting key issues that will need to be considered in planning for these locations.

We reiterate that Riversdale-Willison's inclusion in the ACP is not justified as per the rationale employed - either as a centre itself (non-existent and not planned), nor as an extension of Camberwell Junction.

As previously stated, we are willing and able to collaborate with the Victorian Government to plan for the future of activity centres in Boroondara, rather than having the planning done for us by people that do not have local expertise.

Council can provide significant value to assist the Victorian Government understand these places and what they should look like in the future, while achieving the objective of facilitating more housing.

We look forward to the Minister for Planning and Department of Transport and Planning engaging with us to achieve our common goals.