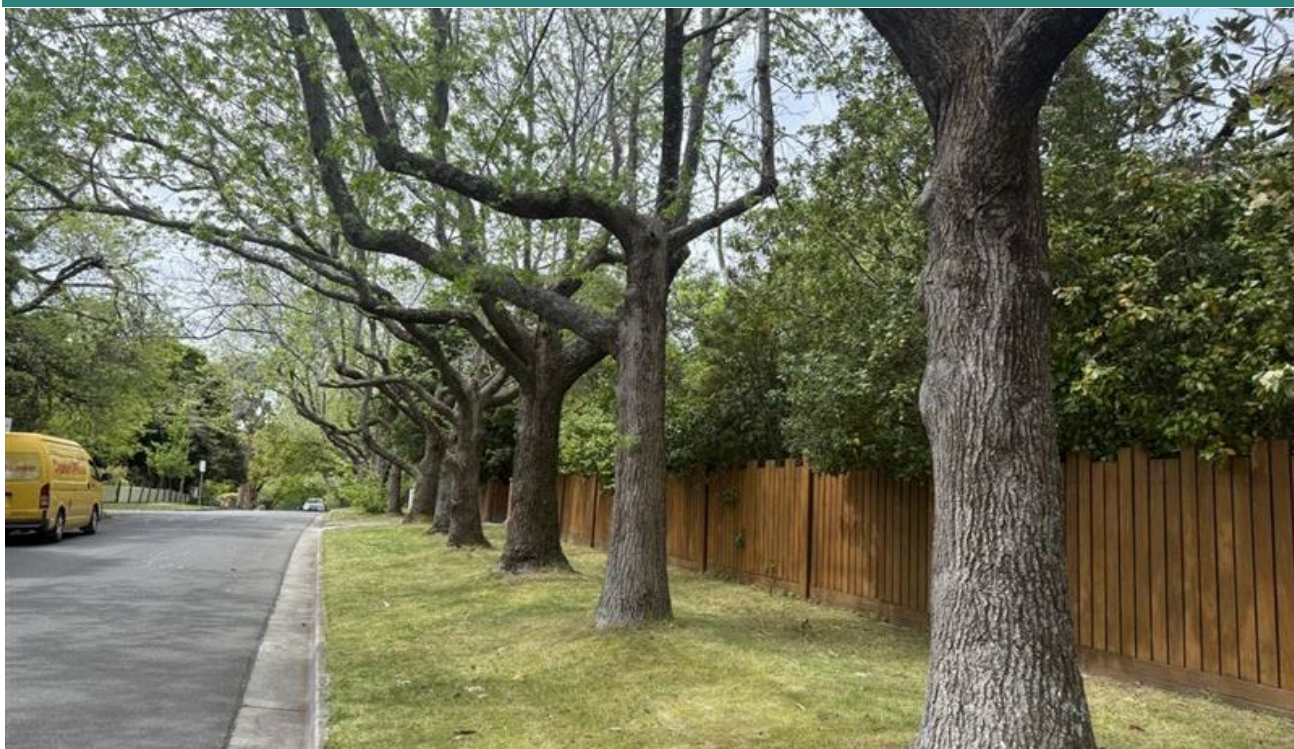




Whitehorse City Council submission

Activity Centre Program – Phase 1 consultation on Blackburn, Nunawading and Mitcham

November 2025



ACKNOWLEDGEMENT OF COUNTRY

“Whitehorse City Council acknowledges the Wurundjeri Woi-wurrung people of the Kulin Nation as the Traditional Owners of the land on which we are meeting, and we pay our respect to Elders past present and emerging.”



1. INTRODUCTION

This submission puts forward Council's position on Phase 1 of the community consultation for Tranche 2 of the Train and Tram Zone Activity Centres Program (ACP), covering three centres within Whitehorse: Blackburn, Nunawading, and Mitcham (the Blackburn–Mitcham Cluster). Council considered a report at its meeting on 24 November 2025 and resolved:

That Council:

- 1. Endorse the submission to State Government for the Phase 1 engagement for the Blackburn, Nunawading and Mitcham activity centres as shown in Attachment 1.*
- 2. Continue to advocate for the importance of the permanent Significant Landscape Overlays, Vegetation Protection Overlays and the Neighbourhood Character Overlays in the State Government's Planning Investigation Areas (PIA) for each activity centre.*
- 3. Advocate to the Minister for Planning (the Minister) to relocate the boundary of the PIA to exclude the permanent SLOs from the future catchment for the Housing Choice and Transport Zone.*
- 4. Advocate to the Minister to include Nunawading Reserve in Silver Grove, Nunawading as a large redevelopment site when determining the future core of the activity centre and to rezone the land in consultation with Council.*
- 5. Request that Ward Councillors and nominated officers be permitted to attend the Community Reference Group meetings as observers.*
- 6. Advocate for an infrastructure contributions mechanism to support housing growth in Blackburn, Nunawading, and Mitcham, and seek clarification on its alignment with Council's Development Contributions Plan and overall infrastructure planning for these centres.*
- 7. Seek that the Department of Transport and Planning share the Phase 1 Community Consultation Report for the Blackburn–Mitcham cluster with both Council and the community ahead of the Phase 2 draft plan release.*
- 8. Request that the Minister appoint an Advisory Committee to hear submissions on the draft plans following the Phase 2 consultation.*
- 9. Congratulates the local community in Whitehorse for raising awareness about the State Government's planning for the Blackburn, Nunawading and Mitcham activity centres and in providing feedback to State Government to ensure community perspectives are considered.*

This submission raises concerns regarding the Phase 1 consultation, including engagement with Council and the Whitehorse community. Having undertaken its own engagement to raise awareness about the Phase 1 consultation, Whitehorse's

submission also incorporates key community feedback on a range of matters across the three activity centres.

Notably, Council and the community are concerned about the protection of Significant Landscape, Vegetation Protection, and Neighbourhood Character Overlays within the Planning Investigation Areas and seek a localised approach that responds to the valued characteristics of each centre.

Council requests that the Department of Transport and Planning (DTP) share the Phase 1 Community Consultation Report for the Blackburn–Mitcham cluster with Council and the community prior to the release of the Phase 2 draft plans. Additionally, Council also requests that the Minister appoint an Advisory Committee to hear submissions on the draft plans following the Phase 2 consultation.

2. CONTEXT

Blackburn, Nunawading, and Mitcham have been nominated as part of Tranche 2 of the Victorian Government's Train and Tram Zone Activity Centres. Following the State Government's planning work, Council understands that new planning controls are proposed for the core areas and surrounding catchments of these centres. Council is committed to working collaboratively with the State Government to ensure that the application of these controls is informed by a comprehensive understanding of each centre and appropriately nuanced to reflect the local context.

This approach seeks to balance the objective of increasing housing supply with the need to preserve and enhance local character, streetscapes, and community values, while also protecting significant landscape features, environmental and heritage assets, and areas covered by vegetation overlays. Council also emphasises the importance of achieving high standards of sustainability, amenity, and infrastructure provision to support future growth.

These centres have historically been identified and planned as Neighbourhood Activity Centres, supported by adopted structure plans and tailored planning controls to guide their future development. The proposed changes introduce higher development densities within the core and catchment areas, representing a substantial shift from the existing strategic planning framework and the long-established local planning context.

3. COMMUNITY ENGAGEMENT FEEDBACK

Council-hosted three pop-up sessions in October 2025. Community interest and participation at the sessions was high, with approximately 200 attendees engaging directly with Council officers and Councillors. Attendees were provided with information on the ACP, consultation opportunities, and ways to provide feedback directly to the State Government. The community had many questions about the ACP and how it might affect their local area.



Figure 1 – Council-hosted pop-up sessions on State Government’s ACP, Britannia Mall, Mitcham –26 Oct 2025

The main themes raised by community members at the Council pop-ups included:

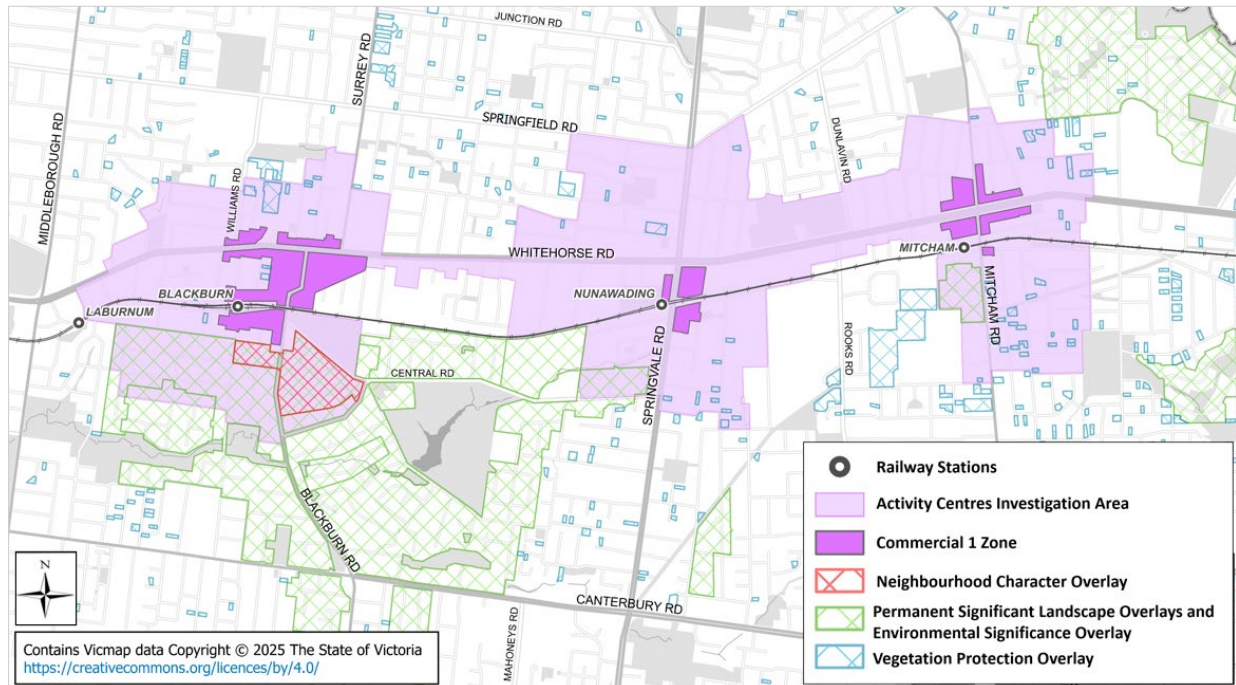
- A strong concern about **tree canopy loss and environmental impacts**, particularly in Blackburn and Mitcham. Residents emphasised the importance of protecting mature trees, Significant Landscape Overlays (especially SLO1 and SLO2), and sensitive landscapes such as the Bellbird National Trust areas. The leafy, low-density character of these suburbs was seen as central to their identity and liveability, with fears that new planning controls could override existing environmental protections.
- The need to **preserve local character, heritage streetscapes**, and the “village” feel of areas like Blackburn. They supported the retention of heritage controls and protection of precincts such as the Walker Estate and the Gillies Street–Ormond Avenue–Mitcham Road area, calling for development that respects established character.
- Concerns about the intensity and form of new development, particularly **building height, overshadowing, and overlooking**. While moderate increases near activity centres were accepted in principle, most preferred maximum building heights be limited to four to six storeys with upper-level setbacks and high-quality, walkable street design.
- Concerns about **Infrastructure capacity** and **environmental constraints**. Residents cited pressure on schools, roads, drainage, open space, hospitals, and public transport, as well as flooding issues and steep topography in parts of Mitcham, which they viewed as unsuitable for higher density development.
- Parking and congestion concerns, particularly near train stations and local streets in Blackburn.

- Frustration with the **planning process and governance**, including the reduced role of Council, loss of resident objection rights, and the perception that “streamlined” approvals favour developers. There was scepticism about Council’s ability to influence planning outcomes, and requests for clearer communication on Council’s role.
- On housing, residents opposed **high-rise towers and large site amalgamations**, preferring lower-scale development and the retention of detached housing. They were also sceptical about claims of improved affordability and concerned about poor-quality, visually intrusive buildings. Many acknowledged the need for more, affordable housing, but not at the expense of neighbourhood character impact and amenity intrusion on existing dwellings.
- **Public transport and accessibility issues**, including limited public transport capacity, walking distances that are unrealistic for older residents or those with mobility challenges, and the steep topography in Mitcham (particularly north-east and south-east of the core) making a 10-minute walk to the train station difficult.
- **Climate and sustainability** as a priority, with calls for stronger ESD standards, tree canopy protection, and better management of flooding and urban heat.

Council is aware that DTP’s online information session held on 28 October 2025 attracted strong participation, with over 100 attendees. The level of community engagement reflects the high level of local interest and passion for the future of the Blackburn, Nunawading, and Mitcham activity centres. Feedback from the DTP session reinforced many of the themes raised through the Council-led pop-up sessions, highlighting ongoing community concern for local character, amenity, and the scale of proposed change.

4. WHITEHORSE SUBMISSION

Whitehorse's activity centres are diverse, vibrant hubs that support housing, employment, retail, transport, and community services. Planning for these centres must balance growth with preservation of local character, environmental values, and heritage.



The following considerations reflect the key issues and priorities for Whitehorse in this submission to the Phase 1 engagement period:

1. Urban Tree Canopy and Environmental Planning Controls
2. Local Identity and Context-Sensitive Planning
3. Infrastructure and Liveability
4. Flood mitigation
5. Integrated Role of Activity Centres
6. Heritage Protection and Built Form Management
7. Affordable and Inclusive Housing
8. Council's Strategic Capability
9. Phase 1 Consultation and Procedural Matters

5.1. Urban Tree Canopy and Environmental Planning Controls

Whitehorse is strongly committed to protecting and enhancing its urban tree canopy through the *Urban Forest Strategy 2021-2031* for a host of reasons: biodiversity and

habitat benefits, climate change mitigation such as urban heat island impacts and water retention, aesthetics and neighbourhood character, for example. As established commercial areas offer limited opportunities for additional planting other than in the public realm, surrounding residential areas play a critical role in achieving the municipality's canopy target of 30% by 2050.

Planning controls such as Significant Landscape Overlays (SLOs) and Vegetation Protection Overlays (VPOs) are essential for safeguarding existing vegetation and ensuring that new development does not compromise environmental values. Council has applied these overlays to protect the unique bushland environments of Whitehorse and significant trees. **It will be important that these environmental planning controls and their effectiveness are retained, like the way Heritage Overlays are proposed to be maintained through the Program.** Refer to Map 1.

- Significant Landscape Overlays (SLOs)

SLO Schedules 1, 2, and 4 in Blackburn, and SLO Schedule 3 for the Walker Estate near Mitcham Station, are affected by the Program. It is recommended that these areas be excluded from the future catchment. There is concern that if the HTCZ were to be applied to these SLO areas, the zone doesn't have any objectives around protecting environmental or landscape values and therefore will create immediate tension with the SLO provisions.

Further, Council seeks protection at the interface with the SLO areas to consider matters such as solar access and other urban design considerations.

These SLO areas are the product of many years of community effort and strategic planning by Council. The SLOs in Blackburn protect the Bellbird National Trust landscape and wider hinterland. They have been in place for decades and have strategic support. Aside from the unique residential character elements these SLOs protect, these areas are uncommon in the metropolitan context and provide critical biodiversity and ecological values, as well as cultural identity (both the indigenous history and in terms of post settlement connections to the artists' movement). There is considerable community commitment to and passion for these environmental values.



Figure 2 – Significant Landscape Area, Linum Street, Blackburn

Complementing SLO4 is the Neighbourhood Character Overlay (NCO2) generally around the Gordon Crescent, Wolseley Crescent and eastern end of The Avenue. Together the provisions in these overlays protect the early settlement of Blackburn where the built form pattern and landscape elements combine to reflect the early inter-war historical development of the area and the dominant treed landscape setting that Blackburn provided. **As with SLO4, the Council seeks retention of NCO2.**

- Vegetation Protection Overlay

VPO schedules 1, 3 and 5 have been applied to individual properties to protect particularly significant tree specimens. **The VPOs are critical to the place identity and environment that is valued by the community and should be retained.** The VPOs feature strongly in parts of the Mitcham Planning Investigation Area.

Council is concerned that the new planning controls may work against the objectives of the overlays and that the qualities that they are protecting will be eroded over time with increased development pressure, resulting in the overlays becoming redundant.

Council has recently written to the Minister for Planning seeking retention of the above SLOs and VPOs, as well as the associated NCO2. It appears that the Engage Victoria web site has been updated to indicate that in addition to heritage overlays, that “landscape protections” will also be retained. **However, clarification is sought regarding the exact overlays being referred to and how they are proposed to be retained in the planning process, including the interaction between the overlays and the new planning controls.**

5.2. Local Identity and Context-Sensitive Planning

Each activity centre in Whitehorse, including Blackburn, Mitcham, and Nunawading, has a unique identity and character, land use profile, and potential for change. **Planning must recognise these differences and treat each centre individually** while considering their interconnections as one cluster, ensuring outcomes are context-sensitive and support the ongoing vibrancy of each centre.

There is concern that a generic set of controls applied to each of the 50 centres identified in the State Government's *Plan for Victoria* will result in a significant loss of local identity for those communities. **Council supports greater housing diversity but seeks a more nuanced approach to increased housing for activity centres that values and respects the existing neighbourhood character.**

For the Blackburn, Nunawading and Mitcham Activity Centres, there is concern that a disproportionate level of growth relative to the level of supporting services available could occur in these locations and may detract from the growth and investment envisaged for Box Hill which is pitched by the State Government as a key component of the business case supporting the Suburban Rail Loop (SRL) East project.

5.3. Infrastructure and Liveability

Housing growth must be accompanied by infrastructure to support increased population and maintain liveability and accessibility within activity centres. This includes investment in public and active transport, community facilities, open space, and streetscape improvements.

As an example, SRL precinct planning has considered matters such as the location of additional pedestrian/bicycle links needed to improve accessibility through the precinct. Proposed links, plans for improvement of the public realm and other strategies for investment seem to be absent from the State Government's activity centre planning process.

Based on the outcome for the 10 pilot activity centres it is understood that an infrastructure contributions mechanism may be applied to the additional 50 activity centres. While this is supported, **Whitehorse seeks clarification on how this will interact with our existing Development Contributions Plan and what community and development infrastructure planning is being done by DTP to support the growth in these centres.**

5.4. Flood mitigation

The Melbourne Water flood modelling of catchments across metropolitan councils to provide updated flood mapping is critical in the planning of the activity centres. **It is**

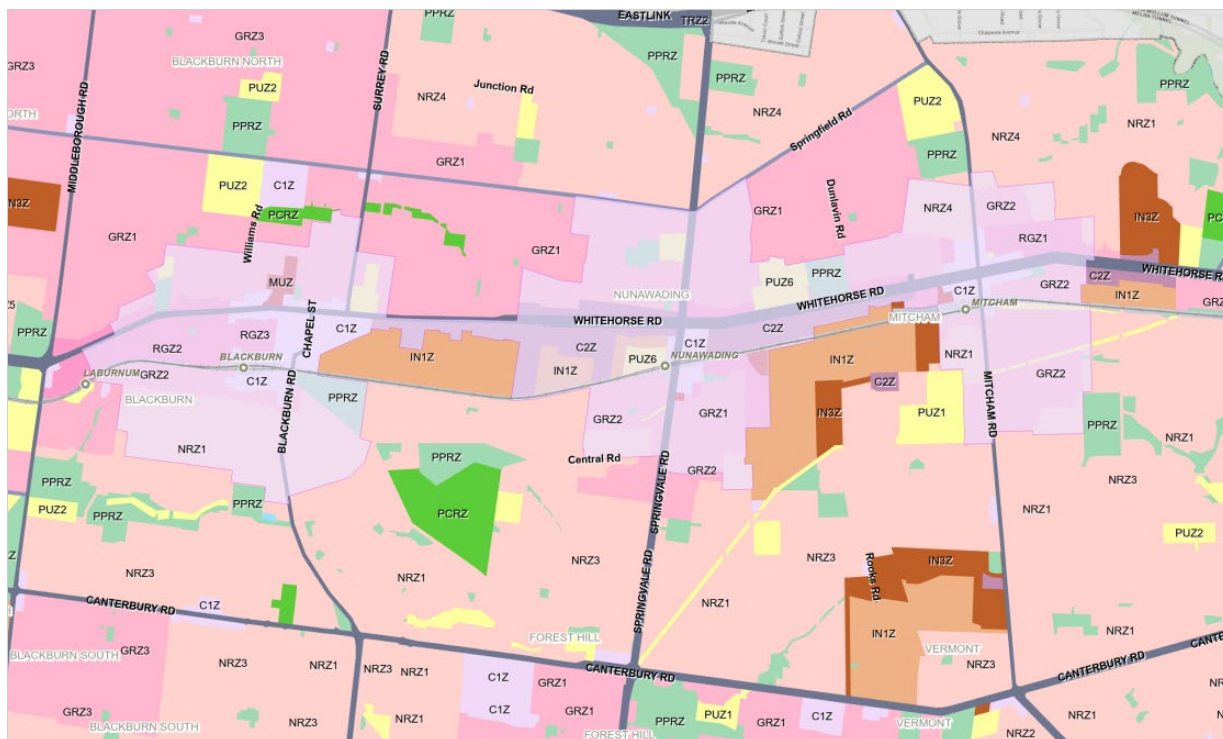
important that the community and Council understand how the flood mapping will affect locations in each activity centre.

5.5. Integrated Role of Activity Centres

Activity centres are critical hubs for employment, services, retail, and public transport. A concern is that focusing solely on housing growth risks undermining these broader economic and social roles. Integrated planning is needed to maintain centres as functional, accessible, and active urban places, and to ensure economic viability and growth.

The importance of the “Megamile” bulky goods corridor and the industrial area between Blackburn and Mitcham is acknowledged and is referenced as Regionally Significant Industrial land in the State Government’s *Melbourne Industrial and Commercial Land Use Plan (MICLUP)*, an incorporated document in planning schemes. **Council seeks clarification of the ACP’s intention regarding the inclusion of the Commercial 2 Zoned land (which generally precludes development for housing) within the Blackburn–Mitcham Cluster Planning Investigation Areas and interaction between the significant Industrial 1 land and potentially sensitive uses.** Refer to Map 2.

It is understood that defining the boundary of the “core area” in each activity centre is to be based largely on the existing Commercial 1 Zoned land and that rezoning of land in the core is not envisaged as part of the ACP process. While this principle is generally supported, in Nunawading, the Council-owned Public Use Zone (PUZ6) land immediately north of the station, known as **Nunawading Reserve in Silver Grove**, is now vacant, with the former Nunawading Recreation Centre and a range of community groups now located at the new Nunawading Hub. **This land should be considered for rezoning as part of the ACP process to facilitate its redevelopment, whilst acknowledging its location adjacent to Industrial 1 land uses with potential amenity impacts**



Map 2 –Zoning in and around the Planning Investigation Area

5.6. Heritage Protection and Built Form Management

Residential areas around the activity centres contain streetscapes and buildings of heritage significance or with local characteristics. **The integrity of existing Heritage Overlays (HOs) and the NCO2 needs to be maintained, including consideration of development outcomes on lots adjoining places covered by HOs to preserve these valued features.**

More broadly, careful consideration needs to be given to achieving a sensitive transition in height to residential areas, particularly between the future core and catchment areas and within the catchment areas, to ensure that overlooking, overshadowing and visual bulk in these sensitive neighbourhoods is managed. In addition, access to sunlight in the public realm during critical hours is vital to the activity centres and their liveability and should be mandated. **Council requests that built form testing be conducted on selected sites to demonstrate DTP's urban design principles.** These sites should be identified in consultation with Council.

5.7. Affordable and Inclusive Housing

Planning reforms should actively promote affordable housing. Inclusionary zoning, use of government-owned sites, and requiring a proportion of new developments to include affordable or social housing can help address housing needs while supporting diverse and inclusive communities.

In the suburbs of Blackburn, Mitcham and Nunawading, there is a significant and growing need for additional social housing. With steady population growth and rising private rents, affordable rental options are becoming increasingly out of reach for local residents. In March 2025, only 1.4 per cent of lettings in Whitehorse were affordable for low-income households (DFFH Rental Report, March Quarter 2025). Recent initiatives, such as the construction of 62 new social housing dwellings in Mitcham (Homes Victoria, 2025), represent positive progress, but far more will be required to meet both current and future demand.

Housing affordability continues to be a major challenge, with 30 per cent of household income generally considered the upper limit that can be reasonably spent on housing. According to the 2021 Census, in Blackburn 443 rental households (30.8%) spend more than 30 per cent of their income on housing; in Mitcham, 459 households (25.9%); and in Nunawading, 353 households (27.5%). Social housing stock remains extremely limited, representing just 0.4 per cent of dwellings in Blackburn, 1.5 per cent in Mitcham, and 3.3 per cent in Nunawading.

The Eastern Affordable Housing Alliance's *Minimum Supply of Social Housing Analysis* (September 2022) identified a shortfall of approximately 2,570 social housing households across the City of Whitehorse, with a requirement to deliver around 190 new social housing units each year to meet projected demand by 2041. Concentrating future social and affordable housing near established activity centres, where the State Government is planning for significant growth, would align with broader planning and infrastructure objectives. It is also important to note that this analysis predates the release of the State Government's *Plan for Victoria* and new housing targets, which project that the number of households in Whitehorse will more than double by 2051. Consequently, the demand for social housing is likely to be significantly higher than current forecasts suggest.

Mechanisms to require affordable housing are within the remit of the State Government and should be included in the ACP's planning controls.

As a key outcome of the ACP, Council calls on the State Government to investigate and facilitate the delivery of an appropriate proportion of affordable housing across the cluster by actively identifying land for affordable housing and putting in place a process for its delivery.

Consideration could be given to utilising the large areas of State Government / VicTrack land used for at-grade car parking at Nunawading and Mitcham for affordable and social housing.

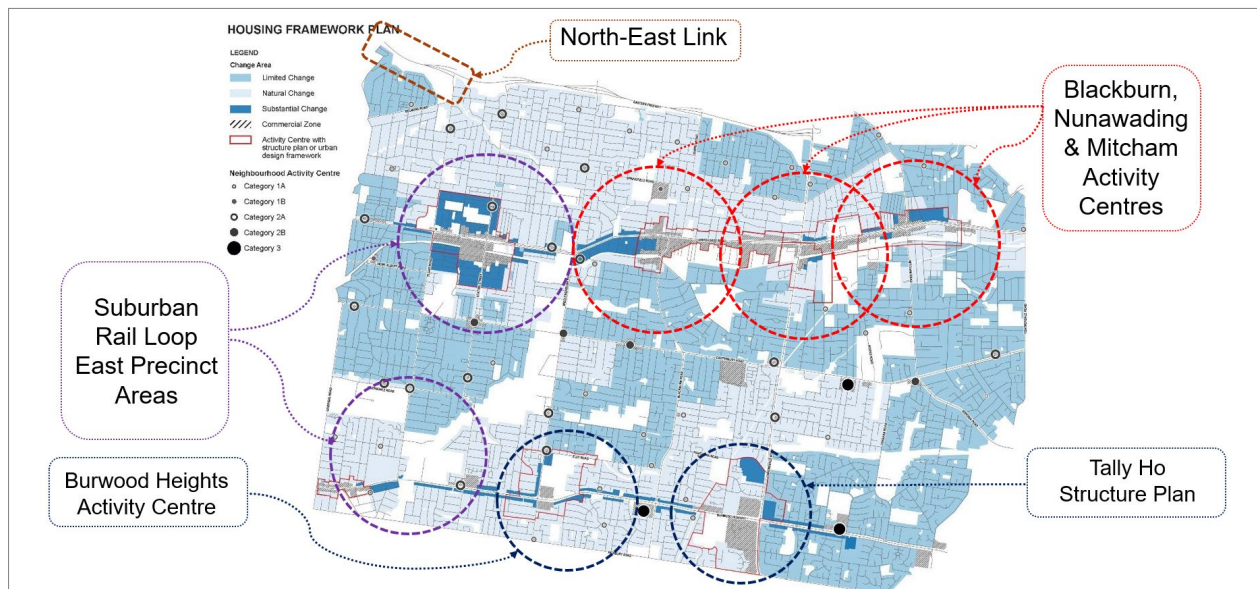
5.8. Council's Strategic Capability

Concurrent with State planning reforms, Whitehorse City Council is actively undertaking local projects that complement *Victoria's Housing Statement* and the ACP in planning

capacity for additional housing. This includes the recently adopted Tally Ho Activity Centre Structure Plan and commencement of a review of the 2014 Whitehorse Housing Strategy. Implementation of previous strategic work for the Box Hill Metropolitan Activity Centre in particular, and for the Burwood Heights Activity Centre and the Residential Corridors along Whitehorse Road and Burwood Highway, has resulted in significant housing delivery in Whitehorse.

The SRL East project further reinforces the strategic importance of the Box Hill and Burwood precincts. **The Council is advocating to the State Government to ensure that local planning objectives, community priorities and infrastructure needs are integrated into precinct planning and delivery.** Refer to Map 3.

Together, these initiatives demonstrate the alignment of Council's plans and projects State reforms in supporting the delivery of high-quality, accessible and vibrant activity centres while advancing the community's long-term vision.



Map 3 – Growth Areas in Whitehorse

5.9. Phase 1 Consultation and Procedural Considerations:

Council acknowledges the issues raised by the community during the Phase 1 consultation. This included concerns about the lack of engagement with Council and the Whitehorse community and the ability to genuinely influence planning outcomes, the diminished role of Council, loss of third part objection and review rights, and fast track approvals processes.

Community feedback highlights the need for a transparent and inclusive planning process, particularly ahead of Phase 2 consultation, scheduled for early 2026. Given the absence of a formal planning scheme amendment exhibition process and the potential

that an Advisory Committee may not be appointed, Phase 2 could be the only opportunity for the community to review and provide input on the draft plans prior to the anticipated introduction of new planning controls by the Minister for Planning.

Accordingly, Council requests that:

- **DTP share the Phase 1 Community Consultation Report for the Blackburn– Mitcham cluster with both Council and the community ahead of the Phase 2 draft plan release.**
- **The Minister appoints an Advisory Committee to hear submissions on the draft plans following the Phase 2 consultation.**

5. CONCLUSION

Council remains committed to working collaboratively with the Victorian Government to achieve balanced and well-informed planning outcomes for the Blackburn, Nunawading and Mitcham Activity Centres.

Council can add significant value by assisting the Government to better understand the unique characteristics of these places and why they are highly valued by the local community and work together to plan for their future to support State government housing policy.

Council requests that the Minister for Planning and DTP consider the above matters and appreciates the opportunity to engage and provide feedback.