

ARMADALE ACTIVITY CENTRES ACTION GROUP

SUBMISSION ON

**THE STATE GOVERNMENT'S PROPOSED ACTIVITY
CENTRE AROUND TOORAK STATION**



March 2026

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EXECUTIVE SUMMARY

The Armadale Activity Centre Action Group (AACAG), representing approximately 50 residents in Armadale, supports the need for increased housing across Melbourne but opposes the Victorian Government's proposed **Toorak Station Activity Centre (TSAC)** framework. The proposal introduces new planning zones allowing **4–6 storey developments across much of the surrounding residential area**, overriding current zoning arrangements and potentially affecting established neighbourhoods with heritage protections.

AACAG argues the proposal creates a direct conflict with the area's extensive **heritage overlays**, which protect predominantly Victorian, Edwardian and Federation housing. While heritage controls technically remain in place, the group believes that planning appeals and redevelopment pressure would gradually erode the existing low-rise character of the neighbourhood.

The submission also contends that redevelopment in this area is unlikely to improve **housing affordability**. High land costs mean new apartments could be priced around **\$1.9–2.3 million**, targeting downsizers rather than families or first-home buyers. As a result, the proposal may reduce housing diversity and push families further from the inner city rather than addressing housing need.

AACAG instead supports the **City of Stonnington Housing Strategy**, which plans for **up to 67,000 additional dwellings** by concentrating higher-density housing around established commercial centres while preserving residential neighbourhood character. The group recommends that the State Government adopt this strategy or, at minimum, exclude **heritage overlay areas from the proposed activity centres** to avoid conflict between growth targets and heritage protection.

AACAG - WHO WE ARE

We are a group of residents all of whom live in Armadale, for the most part in the triangle bounded by Malvern Road, Kooyong Road, High Street and the Dandenong/Frankston line, an area covered by the Government's Toorak Station activity centre. A few of us live to the east of Kooyong Road and a few in the area to the south of High Street in an area covered by the Armadale activity centre. The group has approximately 50 members and is growing.

We came together initially to provide community input to the City of Stonnington's Housing Strategy and more recently to oppose some key elements of the Government's activity centre as it affects our suburb.

The group is led by: four Armadale residents:

- Rob Clemente
- Fran Johnson
- Holly Gray
- Simone and Ian Carson

Our objectives are as follows:

- a. The group recognises and agrees with the need for more housing in the greater Melbourne area
- b. The group opposes the State Government's activity centre proposal
- c. The group supports the Stonnington Housing Strategy, developed over five years, to deliver up to 67,000 extra dwellings in Stonnington, without disrupting or destroying the amenity of the suburbs in Stonnington.

We can be contacted by email at lovearmadale2026@gmail.com

Follow us on Instagram at: save.armadale

THE STATE GOVERNMENT WANTS MEDIUM DENSITY 4 TO 6 STOREY HOUSING THROUGH MOST OF THE TOORAK STATION ACTIVITY CENTRE

The Government's proposal for the Toorak Station Activity Centre ("TSAC") is encapsulated in the activity centre map on page 9 of this submission.

Like most of the other 59 activity centres, TSAC is centred around a railway station (Toorak station) and consists of three new planning zones:

1. **A core** – a small area around Toorak station fronting on to either side of Beatty Avenue and on Orrong Road, permitting developments of up to six storeys.
2. **An Inner Catchment Area** - most of the rest of TSAC covering nearly all of the triangle bounded by Malvern Road, Kooyong Road, High Street and the Dandenong/Frankston line ("the Triangle"). The inner catchment zone will permit buildings of up to 6 storeys on plots of more than 1,000 square metres and up to 4 storeys on plots of less than 1000 square metres.
3. **An Outer Catchment Area** – a small area on the fringes of TSAC. The outer catchment zone will permit buildings of up to 4 storeys on plots of more than 1,000 square metres and up to 3 storeys on plots of less than 1000 square metres.

These will override all existing zones but will **not** override heritage overlays.

THE TOORAK STATION ACTIVITY CENTRE PROVIDES A WIDE CHOICE OF HOUSING STYLES NOW

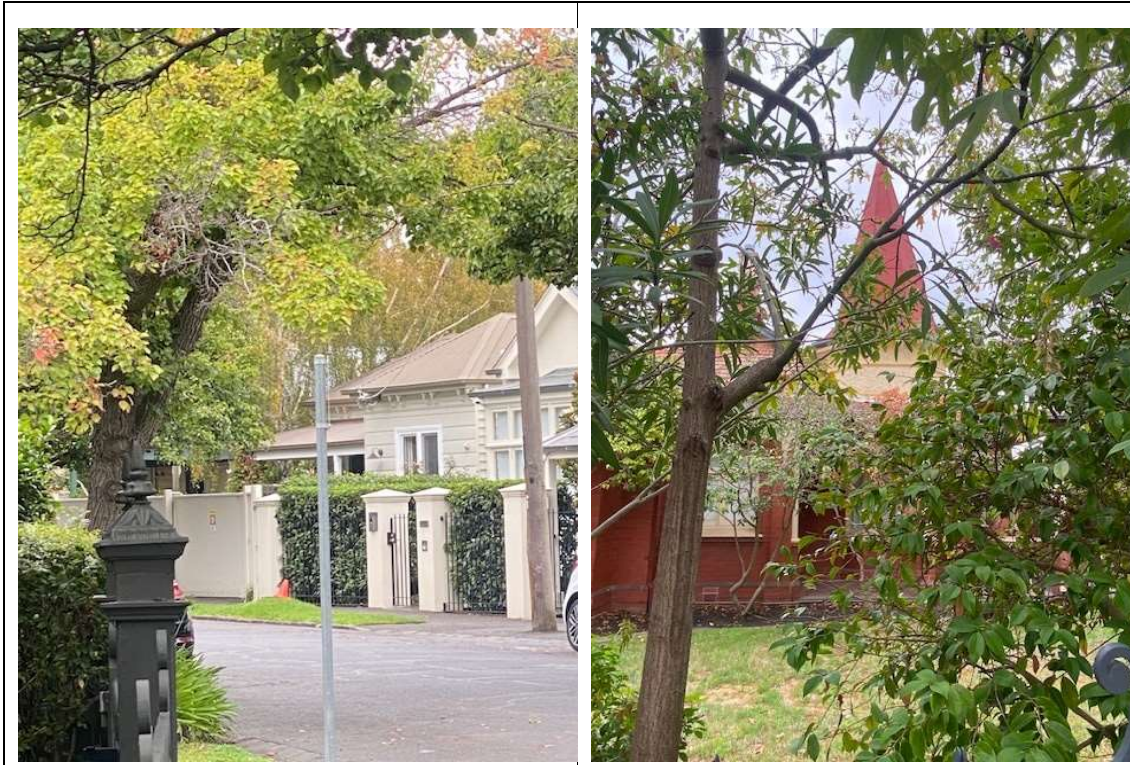
The Triangle provides as wide a diversity of housing as you will find in any inner suburb.

Examples include:

- Small 2 and 3 bedroom Victorian row houses on small plots of land (originally workers' cottages),
- Semi-detached double fronted single storey villas on medium-sized plots of land.
- Larger single storey and double storey dwellings on blocks between 600 and 1,000 square metres.

These houses are occupied by families, most of whom have school age children, many of whom go to the local primary school in Densham Rd. There are also some retirees and empty nesters, as well as young singles.

There are three blocks of 1960s style three storey walk up flats in the Triangle. In addition, there are a number of medium rise (6/7 storey) modern developments on High Street, between Northcote Rd and Kooyong Rd.



IT IS ALSO COVERED BY A HERITAGE OVERLAY

Most of the Triangle is covered by a heritage overlay, adopted by the City of Stonnington after a detailed heritage study conducted some years ago. The overlay provides a schedule covering the improvements on every property subject to the overlay, rating nearly all those improvements as either **significant** or **contributory**. Improvements on properties subject to a heritage overlay cannot be demolished or altered without a planning permit.

The current zoning regime provides support for the objectives of the heritage overlay:

- Beatty Avenue aside, nearly all the Triangle is currently zoned Neighbourhood Residential (NRZ), which permits dwellings of up to two storeys only.
- Properties on the south side of Malvern Rd are currently zoned general residential (GRZ), which permits 3 to 4 storey developments.

The Triangle mostly contains Victorian, Edwardian and Federation period housing, some stand alone, some row housing and some duplex housing,

WHY THE GOVERNMENT'S ACTIVITY CENTRE PROPOSAL WILL DESTROY THE HERITAGE CHARACTER OF THE TRIANGLE

The proposed new height limits will be in direct conflict with the heritage overlay. The heritage character cannot possibly be maintained if it is dotted with 4 to 6 storey apartment blocks.

While developers will initially seek out the low hanging fruit in areas not subject to a heritage overlay, inevitably someone will find a property with less heritage value and seek a permit to build an apartment block of, say four storeys. The Council will oppose it and the developer will take it to VCAT. It will be a question of discretion, the outcome uncertain, but one new development will eventually get through.

Owners of surrounding properties will move out and invariably more properties will be acquired for redevelopment. Following more appeals, inevitably more permits will be granted and the existing neighbourhood character will be gradually but inevitably destroyed.

We are not confident about the Government's assertion that the heritage overlay will prevail over the new height limits. Further, if the Government really believes this, then the Triangle could never be a major contributor to the housing crisis, so why include it in TSAC?

The government itself referred a number of matters relating to the Activity Centres program to its own advisory committee, the Activity Centres Standing Advisory Committee, which reported on 6 November 2024.

Our group supports the City of Stonnington's suggestion that areas subject to a heritage overlay should be excised from activity centres.

The Government's own advisory committee on the activity centre program recommended that areas covered by a heritage overlay be excluded from activity centre catchment areas at page 28 of its report:

"The Committee recommends:

10. If the Walkable Catchment Zone is applied, **do not apply it to areas where:**

a) the Heritage Overlay or the Neighbourhood Character Overlay applies

b) 3.4 other planning controls or constraints on development apply such that the scale of development envisaged under the Walkable Catchment Zone would not be appropriate."¹

The Committee's reasoning accords with ours:

¹ Planning Panels Victoria, Referral 1: Draft Built Form Overlay and draft Walkable Catchment Zone, Activity Centres Standing Advisory Committee Report, 6 November 2024,

“While not necessarily the case in all circumstances, the Committee anticipates that in the vast majority of cases, residential development between three and six storeys will be inconsistent with the objectives and purposes of the Heritage Overlay and NCOs. This creates an inherent conflict between planning controls, which is undesirable.”²

WHY THE GOVERNMENT’S ACTIVITY CENTRE PROPOSAL WOULD DO LITTLE TO PROVIDE AFFORDABLE HOUSING

What contribution would our pocket of Armadale make towards more affordable housing?

In our view, medium density development in the TSAC would **not** assist in providing affordable housing for those in need.

- Land in TSAC is **expensive**.
- Assuming a median price of around \$7,000 per square metre, the developer’s land cost would vary between \$2.1 million (300 sq m) to \$7 million (1,000 sq m), plus stamp duty.
- The advice we have received suggests that a developer would have to ask around \$17,500 per square metre for apartments in a development in TSAC.
- Therefore a 2 bedroom apartment of 110 sq m would cost around \$1.9 million and a 3 bedroom apartment of 130 sq m about \$2.3 million.

Who would buy these apartments? First home buyers? Rich singles aside, unlikely. Families, very unlikely. These apartments would be bought by empty nesters and downsizers, not working families and those looking for affordable housing.

Housing diversity, already under pressure in the inner suburbs of Melbourne, would be lost and families would move further away from the centre, defeating the purpose of the policy.

THERE IS A BETTER WAY . . .

There is nothing wrong conceptually with activity centres. There is everything right about ensuring that the whole city works together to provide more housing, particularly more affordable housing. Housing diversity exists in Stonnington and the Council’s Housing Strategy highlights where change is occurring most rapidly across the municipality and plans for accommodating growth.

Higher density housing – particularly within and adjacent to Activity Centres - today comprises 40 per cent of total available housing stock across Stonnington. Medium density housing or medium-rise apartments - noted as the ‘missing middle’ - is what is planned for in the City of Stonnington’s Housing Strategy.

² P. 28.

The City of Stonnington has developed a carefully designed housing strategy that provides up to 67,000 more dwellings in Stonnington to meet the city’s housing needs **without** degrading or destroying the character of the various suburbs and precincts forming part of Stonnington.

How the City of Stonnington’s approach to activity centres will protect the character of its neighbourhoods

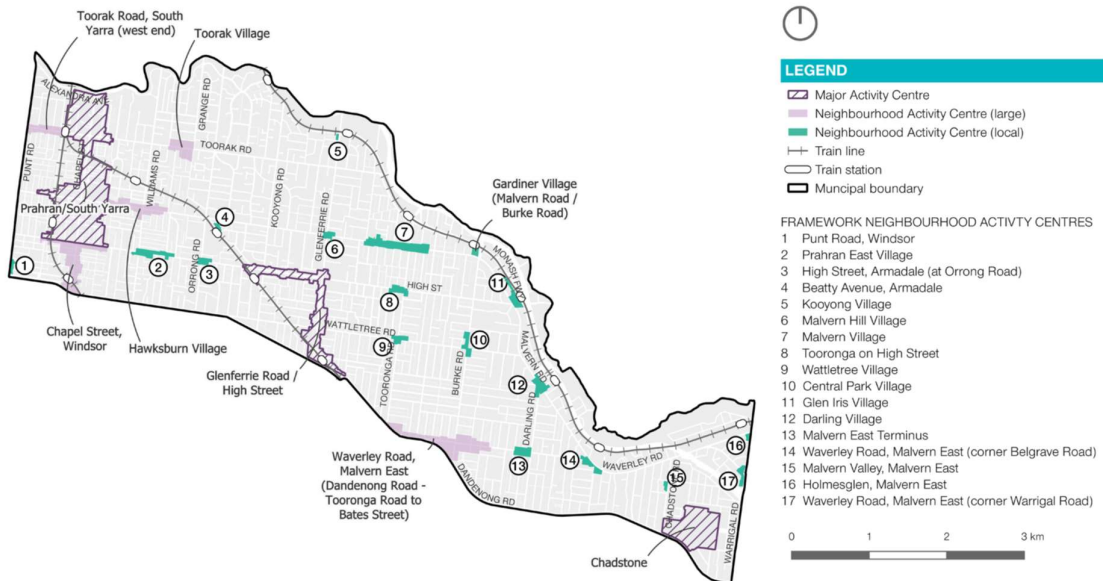
It’s simple. You build your activity centres around existing retail and commercial hubs. There is no need to change the existing zoning taxonomy or height limits:

- The NRZ zone provides effective heritage protection because of the height limits.
- GRZ and RGZ allow for multi-storey apartment buildings in the activity centres Stonnington has identified.

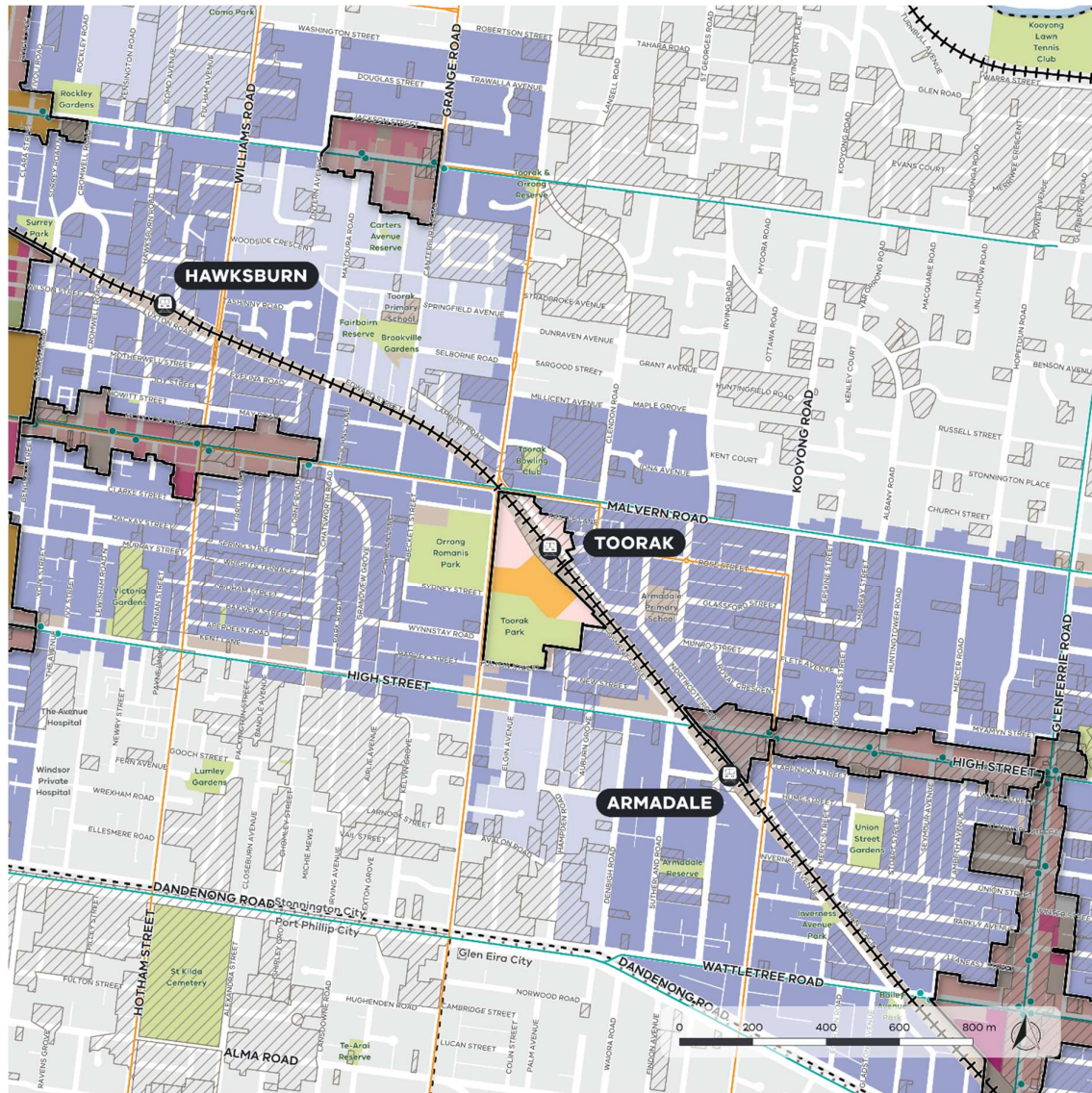
The Stonnington plan calls for three types of activity centres:

- Major Activity Centres (there are three – see below)
- Neighbourhood Activity Centres – Large
- Neighbourhood Activity Centres – Local

The map below shows their locations.



Now let's compare that with the Government's activity centre proposal. This map shows the Government's plans for the part of Stonnington closest to the CBD.



LEGEND

- Train and tram zone core boundary
- Train line and station
- Tram stop inside the core
- Tram route
- Bus route
- Heritage Overlay
- LGA boundary
- Waterbody
- Park / open space
- Generally non-residential land use (includes commercial areas / public uses / schools)

PROPOSED BUILDING HEIGHTS

- Up to 6 storeys
- Existing height controls

CATCHMENTS

- Inner Catchment
 - Up to 4 storeys
 - 6 storeys on large sites
- Outer Catchment
 - Up to 3 storeys
 - 4 storeys on large sites

*Note: heights shown on Council-owned land subject to Council consideration.
 Note: proposed changes on Homes Victoria or Department of Families, Fairness and Housing land do not imply future redevelopment.*

The difference is palpable. Stonnington's major activity centres roughly correspond to the core in the Government's centres. There the similarity ends. Stonnington's Housing Strategy protects its residential neighbourhoods.

The Government proposes to destroy those areas by slating all the areas in dark purple on the map for 4 to 6 storey development. This is unnecessary and it's wrong.

Stonnington's plan for additional dwellings works just as well

The Stonnington Housing Strategy notes that the activity centres alone can accommodate 17,000 additional dwellings (page 36). The Strategy acknowledges that this alone is not enough and addresses the need to provide the necessary medium density housing in existing residential areas.

It divides the residential areas of Stonnington into six types (each with two subtypes, depending on whether the properties are zoned NRZ or GRZ):

- Garden Estate
- Garden River
- Inner Urban
- Suburban Garden
- Urban Garden
- Transport corridor (no subtypes)

Here is the map (page 42).



On page 50, the Strategy sets out the development that **can** occur in the residential areas of Stonnington:

| Neighbourhood Character | | Preferred Future Built Form | |
|-------------------------|----------|---|---|
| Character Type | Sub Area | Building Height | Building Typology |
| Transit Corridor | - | Generally two to four storeys, dependent on site context and constraints | Apartments, townhouses and dual occupancies |
| Inner Urban | 1 | Up to three storey built form, heights of 11 metres dependent on site context and constraints | Single dwellings, dual occupancies, townhouses and apartments |
| | 2 | One to two storey built form, heights of nine metres | Single dwellings and dual occupancies |
| Garden River | 1 | Up to three storey built form, heights of 11 metres dependent on site context and constraints (12 metres may apply in some areas) | Single dwellings, dual occupancies, townhouses and apartments |
| | 2 | One to two storey built form, heights of nine metres | Single dwellings and dual occupancies |
| Garden Estate | 1 | Up to three storey built form, heights of 11 metres dependent on site context and constraints (12 metres may apply in some areas) | Single dwellings, dual occupancies, townhouses and apartments |
| | 2 | One to two storey built form, heights of nine metres | Single dwellings and dual occupancies |
| Urban Garden | 1 | Up to three storey built form, heights of 11 metres dependent on site context and constraints (12 metres may apply in some areas) | Single dwellings, dual occupancies, townhouses and apartments |
| | 2 | One to two storey built form, heights of nine metres | Single dwellings and dual occupancies |
| Suburban Garden | 1 | Up to three storey built form, heights of 11 metres dependent on site context and constraints (12 metres may apply in some areas) | Single dwellings, dual occupancies, townhouses and apartments |
| | 2 | One to two storey built form, heights of nine metres | Single dwellings and dual occupancies |

The Stonnington Housing Strategy clearly demonstrates that the Government’s housing targets for the municipality can be met without destroying the neighbourhood character of its residential areas by permitting 4 to 6 storey developments in those areas.

OUR SUBMISSION

We submit that:

1. In order to protect the character of Stonnington's residential areas while achieving necessary growth targets for new dwellings, **the State Government adopt the City of Stonnington Housing Strategy in full.**
2. **The State Government not proceed with its planned 15 activity centres** in the City of Stonnington.
3. In the event that the Government does proceed with all or any of those activity centres, **the Government excise all areas of Stonnington covered by heritage overlays from its activity centres** in order to remove the inherent conflict between 4 to 6 height limits and the heritage overlays. (This would include the heritage overlay areas in TSAC.)