

Train and Tram Zone Activity Centres Program
Department of Transport and Planning
State Government of Victoria

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Re: National Trust of Australia (Victoria) submission – Train and Tram Zone Activity Centres Program stage two consultation

To whom it may concern,

I write on behalf of the National Trust of Australia (Victoria) (National Trust) to make the following submission to the Train and Tram Zone Activity Centres Program consultation.

Recommendations to the Department of Transport and Planning:

- ESTABLISH a dedicated heritage planning unit within the Department of Transport and Planning (DTP) to provide expert guidance to planning reform programs and local Councils on local heritage matters outside Heritage Victoria's remit, including the integration of local heritage considerations into Activity Centre and broader state planning frameworks.
- ENSURE that DTP's Activity Centre planning teams include or have access to staff with specialist local heritage planning expertise, and that local heritage advice is integrated into all stages of Activity Centre planning and assessment.
- RESOURCE local Councils to manage increased heritage planning demands arising from the Train and Tram Zone Activity Centres Program, including funding and support for heritage gap studies and Planning Scheme Amendments.
- PRIORITISE the review and assessment of Heritage Overlay Planning Scheme Amendments awaiting ministerial approval in Activity Centres.
- COMMUNICATE how the Heritage Overlay interacts with Activity Centre planning and broader state planning frameworks and how retention of heritage can be successfully integrated with increased housing density.
- CONSULT with the National Trust as a key partner in the development of Activity Centre planning guidance and implementation of broader state planning frameworks.

Recommendations to the Train and Tram Zone Activity Centres Program:

- ESTABLISH processes for;
- Enabling Councils to pause approval of planning and demolition permits under 'deemed-to-comply' provisions if a place has potential heritage significance and undertake an appropriate heritage assessment to inform decision making.
- Supporting Councils to seek interim heritage protection for places in Activity Centres that are subject to a proposed Heritage Overlay Planning Scheme Amendment.
- Supporting Councils in the provision of suitable public open space, and retention of significant and established trees, including enforceable protection of root zones and soils.
- Providing guidance, encouragement, and incentives for retrofitting and adaptive reuse of existing and heritage buildings in Activity Centres to maximise housing yield while at the same time preserving embodied energy and neighbourhood character.
- Supporting private land holders with incentives to conserve and protect existing privately owned green space and mature canopy trees.

Supporting Information

National Trust Position

We acknowledge that Victoria faces a genuine housing challenge that requires ambitious and coordinated action, and that Activity Centres clustered around existing train and tram infrastructure represent a sensible spatial framework for directing growth.

The National Trust supports densification in and around heritage areas, if the change is managed in a manner that retains the cultural heritage values of those places.

We support the government's 30% canopy cover target and believe systems should be implemented to help Councils and developers achieve this goal.

Explanation and policy with regard to the Heritage Overlay is currently absent from the Activity Centres program and related policies. Heritage is not a barrier to development but provides a framework for ensuring development growth produces places of quality and lasting value for the communities that inhabit them.

The National Trust is committed to working constructively with DTP and the Victorian Government to address heritage concerns and ensure heritage is visible in the policy and guidelines of the Activity Centres program and broader state planning reforms.

We believe that with the right policy and guidance in place, the Train and Tram Zone Activity Centres Program can deliver significant housing outcomes while utilising and protecting the heritage character that makes Victoria's suburbs distinctive, liveable, economically diverse and vibrant places.

Remit of the National Trust

The National Trust is the state's largest community-based heritage advocacy organisation, actively working towards conserving and protecting our heritage for future generations. We represent 60,000 members and supporters across Victoria and have been engaged in heritage advocacy and conservation since our establishment in 1956.

Whilst we are an independent, non-government organisation, we work collaboratively with government, local Councils, businesses, and community groups to support heritage protection, increase community involvement in heritage conservation, and contribute to the creation of liveable and distinctive places.

Previous Submissions to Government

The National Trust has already engaged extensively with DTP regarding the government's suite planning and strategy reforms over the past several years, including those that underpin the Activity Centres program.

In August 2024, our [submission to the Plan for Victoria consultation](#), indicated the National Trust's in principal support for well-managed densification.

In 2025, we encouraged our extensive stakeholder network to [engage with the parliamentary inquiry](#) reviewing amendments to the Victoria Planning Provisions to facilitate the Activity Centres program (VC257, VC267 and VC274). We note the inquiry found submitters' concerns regarding heritage to be valid. However, to our knowledge, the reforms have proceeded without amendment despite these findings.

Recommendation:

- CONSULT with the National Trust as a key partner in the development of Activity Centre planning guidance and implementation of broader state planning frameworks.

The Value of Heritage

The National Trust has found a growing spread of misconceptions scapegoating heritage protection systems in relation to the housing crisis deeply concerning. While we support planning reforms to enable densification in heritage areas, we maintain these should not be at the cost of retaining significant heritage places, community trust, or professional oversight. Streamlining processes should reduce unnecessary burden, **not reduce safeguards**.

Heritage Overlays ensure that change is considered, respectful, and retains what we already love about where we live. The Heritage Council of Victoria's report, '[Why Heritage: A synthesis of evidence for the social, economic and environmental impacts of heritage](#)' (2023), provides compelling evidence for the multidimensional value that heritage places contribute to Victorian communities and the broader economy.

Moreover, heritage is not just buildings, cultural landscapes such as green space in more urban contexts contribute environmentally, socially, and economically across Victoria. It is well known that trees can mitigate the urban heat island effect and provide health benefits to the community, as well as create healthier ecosystems with a greater diversity of species in urbanised contexts. Furthermore, green space improves wellbeing and liveability in areas with increasing population density and development pressures.

Ongoing YIMBY claims that Heritage Overlays “lock up land” and restrict urgently needed development opportunities for community growth in the current housing crisis are unfounded and frame housing supply as a choice between heritage and development. This narrow and simplistic approach is not supported by evidence and misrepresents the role heritage plays in Victoria's cities.

The National Trust advocates for a [TIMBY approach](#) – “Thoughtfully In My Back Yard.” TIMBY supports housing growth that is well designed, sustainable and responsive to local context, ensuring new development enhances neighbourhoods rather than eroding the qualities that make them liveable.

Recommendation:

- COMMUNICATE how the Heritage Overlay interacts with Activity Centre planning and broader state planning frameworks and how retention of heritage can be successfully integrated with increased housing density.

Heritage Expertise in DTP

The Victorian Government has not clearly communicated how heritage places are being considered and incorporated into the Activity Centre program design. This has created uncertainty and anxiety in the community about the potential risks posed to heritage places.

The results of the 2025 parliamentary inquiry confirmed that the community held valid concerns for threats to heritage places if proper guidance and consideration of heritage protections is not incorporated into the Activity Centre program.

If heritage is to be successfully implemented into Activity Centre planning, decision-makers within DTP must have access to staff with a detailed understanding of Heritage Overlays and how they operate in practice. Additionally, this internal advice will be required to support Councils to successfully integrate heritage into Activity Centre implementation.

If there is an absence of local heritage expertise in the teams responsible for implementing the Activity Centres program, this gap should be addressed. The National Trust urges DTP to

ensure any advice from staff with specialist local heritage planning expertise is meaningfully considered in the design and implementation of the Activity Centres program. This need is particularly acute given the scale and pace of the Activity Centres Program.

Additionally, it is important to properly support local Councils (through resourcing and advice) so they can adequately be ready for and assess development applications at heritage places in Activity Centres. The Heritage Council of Victoria's report '[State of heritage review: local heritage](#)' (2020) identified a systemic underfunding of local heritage planning functions across Victoria, with many Councils lacking the staff and expertise needed to manage the volume and complexity of heritage-related planning decisions. The Activity Centres Program will substantially increase the pressure already on these resources.

Recommendations:

- ESTABLISH a dedicated heritage planning unit within the DTP to provide expert guidance to planning reform programs and local Councils on local heritage matters outside Heritage Victoria's remit, including the integration of local heritage considerations into Activity Centre and broader state planning frameworks.
- ENSURE that DTP's Activity Centre planning teams include or have access to staff with specialist local heritage planning expertise, and that local heritage advice is integrated into all stages of Activity Centre planning and assessment.
- RESOURCE local Councils to manage increased heritage planning demands arising from the Train and Tram Zone Activity Centres Program, including funding and support for heritage gap studies and Planning Scheme Amendments.

Unintended Heritage Impacts of the Activity Centres Program

The National Trust is concerned that current policies of the Activity Centres program risk the loss of local heritage including built fabric and green infrastructure (such as gardens and trees, both private and public) that make these places distinctive and desirable to live in.

While we understand that the proposed new Activity Centre planning controls do not change existing Heritage Overlays, and generally development proposals must still be assessed under any relevant Heritage Overlay requirements, our concerns lie with those heritage places not yet included in the Heritage Overlay.

The absence of a Heritage Overlay does not mean that a place does not have heritage significance. Removing public notice requirements and VCAT appeal rights for 'deemed to comply' planning applications means that sites of potential heritage value could be demolished before proper assessment can occur.

The expedited permit process enabled by 'deemed to comply' pathways also create incentives for demolition. Once a building of cultural, architectural or community value is demolished, it is gone forever.

Recommendations:

- PRIORITISE the review and assessment of Heritage Overlay Planning Scheme Amendments awaiting ministerial approval in Activity Centres.
- ESTABLISH processes for enabling Councils to pause approval of planning and demolition permits under 'deemed-to-comply' provisions if a place has potential heritage significance and undertake an appropriate heritage assessment to inform decision making.
- ESTABLISH processes for supporting Councils to seek interim heritage protection for places in Activity Centres that are subject to a proposed Heritage Overlay Planning Scheme Amendment.

Unintended Green Infrastructure Impacts of the Activity Centres Program

The valued character of many Activity Centres is not solely derived from built places but also [tree canopy cover, as well as public and private landscaping](#). Many of the nominated Activity Centres, particularly in Melbourne's middle suburbs have relatively low levels of public green space due to the higher levels of private green space these areas originally incorporated. This private green space contributes significantly to urban cooling, biodiversity, and community wellbeing. It is, therefore, essential that the resulting loss of green space across Activity Centres be offset with the creation of new spaces to maintain existing open space benchmarks.

Development pressures in Activity Centres, will put green infrastructure, and the distinctive character of their precincts at serious risk. The potential loss of established tree canopy and private green space due to increased density and construction requirements for new developments is a critical consideration for the future residents of high and medium density housing, where private green space will be minimal or non-existent.

While we understand that DTP has incorporated a program to provide Councils with funding to purchase land for new public green infrastructure in Activity Centres, the retention of existing trees and landscapes must be prioritised. We therefore applaud DTP's meaningful response to community feedback regarding the Blackburn Station Activity Centre and [the decision not to include the Bellbird Estate in the catchment area](#).

No urban tree should be removed unnecessarily as we face the climate crisis. The environmental services that urban trees provide are essential to sustainable, viable and liveable cities, especially in cities that face warmer temperatures and lower rainfall.

Despite the recent introduction of *Clause 52.37 Canopy Trees*, mature trees - even trees recognised as significant - may be removed, simply if deemed to be "at risk of causing damage" to infrastructure. Where replacement canopy trees are required, these will take many decades to replace the amenity and environmental benefits lost from the removal of

mature trees. There are also no guarantees replacement trees will be successfully maintained through establishment to maturity.

Additionally, measures should be put in place to prevent development sites from being “moonscaped” and mandate the retention of trees and vegetation cover overall. Currently, landscaping is often seen as an ‘afterthought’ in a new development, not as an integral component, and is confined to the perimeter of the site. The practice of utilising neighbouring properties to fulfil landscaping obligations should also be prohibited (e.g. overhanging tree canopies).

Recommendation:

- ESTABLISH processes for supporting Councils in the provision of suitable public open space, and retention of significant and established trees, including enforceable protection of root zones and soils.
- ESTABLISH processes for supporting private land holders with incentives to conserve and protect existing privately owned green space and mature canopy trees.

Unsustainable Development

There is no clear guidance or encouragement for reuse or infill within existing heritage or non-heritage buildings in the current Activity Centre program. This gap will incentivise demolition and the release of embodied carbon instead of promoting sustainable reuse of existing buildings.

It is a [well-established fact](#) that “the greenest building is the one that is already built”. To produce sustainable, vibrant neighbourhoods, DTP should provide incentives for adaptive reuse and infill development that retain high-quality heritage and existing buildings.

For example, underutilised shop-top spaces are a common feature in many Activity Centre retail core areas. Encouraging and supporting the refurbishment of these as residential spaces would provide additional housing supply, close to public transport and within existing buildings that retain local streetscapes. Guidance for this type of adaptive re-use development should be provided and incentivised through streamline pathways in the Activity Centre program.

Recommendation:

- ESTABLISH processes for providing guidance, encouragement, and incentives for retrofitting and adaptive reuse of existing and heritage buildings in Activity Centres to maximise housing yield while at the same time preserving embodied energy and neighbourhood character.

Conclusion

The Train and Tram Zone Activity Centres Program, as currently designed, contains significant gaps and risks in its treatment of heritage and the retention of existing landscapes and significant trees.

The National Trust supports the Victorian government's ambition to deliver more housing in established suburban Activity Centres. Well-managed densification around public transport infrastructure is sound planning policy.

However, there has been a clear lack of communication and visibility regarding how heritage will be considered throughout the design and implementation of the Activity Centre policy. Heritage places including green infrastructure, are huge contributors to the liveability of each Activity Centre and contribute to the long-term sustainability of Victoria's built and natural environment.

The National Trust thanks DTP for this opportunity to provide feedback regarding the Train and Tram Zone Activity Centres Program and we remain committed to working with the government to deliver well designed, vibrant and liveable neighbourhoods that increase affordable housing and retain and utilise Melbourne's distinctive heritage and landscapes.



Yours sincerely,

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