



**Merri-bek**  
City Council

# **Activity Centres Program Phase 2: Technical paper**

**October 2025**



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**Merri-bek City Council acknowledges the Wurundjeri Woi-wurrung people as the Traditional Custodians of the lands and waterways in the area now known as Merri-bek. We pay respect to their Elders past and present, as well as to all First Nations communities who significantly contribute to the life of the area.**

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## **Introduction**

Merri-bek City Council (Council) welcomes the opportunity to provide feedback on Phase 2 of community engagement for the Victorian Government's Activity Centres Program (Program) as a key stakeholder to the program.

To meet the needs of Merri-bek's growing population, more housing will be needed in well-serviced areas. Council supports increased housing in the Brunswick and Coburg Activity Centres (ACs), provided it is carefully planned to deliver affordable, sustainable, and diverse homes, supported by essential infrastructure, transport, jobs and open space. These priorities were outlined in Council's Phase 1 submission.

In this phase of community engagement, the State Government is primarily seeking feedback on draft maps showing proposed building heights and activity centre boundaries across the approximately five-kilometre corridor from Brunswick to Coburg. This technical paper focuses on these issues.

These maps, once finalised, will guide new built form planning controls. This includes applying a Built Form Overlay (BFO) to the core (with no change to the existing zone) and rezoning surrounding residential land to the Housing Choice and Transport Zone (HCTZ) across the inner and outer catchments (HCTZ1 and HCTZ2). Strong planning controls, grounded in comprehensive analytical approach and scenario testing are essential to ensure high-quality, well-integrated outcomes to support sustainable growth.

However, the publicly available information provided in this phase of engagement however is limited. Council has not received any urban design analysis, technical or methodology reports, nor any modelling to underpin and inform the proposed heights, core and catchment boundaries. This missing information is critical to understanding whether the planning framework represented in the maps can realistically be achieved whilst still meeting key urban design principles essential for a well-designed activity centre.

This technical paper therefore provides feedback based on the limited information available at the time of writing.

## **Phase 1 themes**

### **Council's feedback**

As submitted during the Phase 1 engagement, Council is supportive of the State Government's objective to focus housing growth in well-serviced areas such as along the Sydney Road corridor in Brunswick and Coburg (known as the Merri-bek Cluster). This growth must be carefully planned to ensure delivery of affordable, sustainable, and diverse high-quality housing supported by essential infrastructure, transport, jobs and open space.

Council continues to have material concerns with the current approach and asks the Minister for Planning to address these to ensure the accelerated Program does not compromise the liveability of Brunswick and Coburg. Despite the significance of the Program, there is an absence of technical

data, limited community engagement, and inadequate timelines for feedback, which undermined the ability to make informed contributions.

It is critical that the Program enables the long-term success of these activity centres and addresses the issues raised in Council's submission to Phase 1 (See Appendix 2):

- **Transport** – investment is needed to improve the capacity, accessibility, and integration of public and active transport networks, including duplication of the Upfield Line and bus network and accessible tram stop improvements.
- **Infrastructure** – growth must be accompanied by timely upgrades to local and State infrastructure, including open space, drainage, roads, schools, and community facilities.
- **Economic growth and employment** – the Program should safeguard and expand employment floorspace. Council requests authorisation of Amendment C230mbek to support Brunswick's employment role and retain commercial land.
- **Affordable and diverse housing** – Council seeks increased State investment in social and affordable housing, and planning controls that encourage diverse, accessible housing types, including family-sized apartments and dwellings designed to support people at all life stages.
- **Design quality** – Council emphasises the need for clear, enforceable design controls to ensure new development delivers high-quality, liveable, and contextually responsive outcomes.
- **Climate adaptation and resilience** – Council advocates for strong environmentally sustainable design (ESD) provisions, flood resilience planning, and integration of precinct-scale water management strategies.
- **Community and Council engagement** – the Program must commit to meaningful, inclusive engagement.

A critical community concern is transport. While Sydney Road is serviced by the Upfield train line and tram route, the Upfield train line has one of the lowest frequencies of service in metropolitan Melbourne and Sydney Road trams also lack accessibility for those with mobility disability. The activity centres serviced by this train line and tram route can accommodate significant housing growth, however the road network is already heavily congested. Addressing constraints in the public transport network is therefore an urgent priority to support the current and future community.

## Community feedback

The Engage Victoria Activity Centres Program – Phase 2 website includes Phase 1 Consultation Summary Report and Statements of Advice from Community Reference Groups. The feedback from the Merri-bek community closely aligns with the transport, infrastructure, economy, climate, affordable housing and design quality matters raised in Council's Phase 1 submission. This documented feedback from the community is summarised in Table 1:

| Table 1 – Summary of Community Feedback to Phase 1 |                                                                                                                                                                                                                                                |
|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Top interests</b>                               | <ul style="list-style-type: none"><li>• Urban design and built form</li><li>• Access to open space</li><li>• Traffic congestion and movement</li><li>• Impact on local character and heritage</li><li>• Housing choice and diversity</li></ul> |
| <b>Key concerns with density</b>                   | <ul style="list-style-type: none"><li>• Protect parks and open space</li><li>• Improve walking and cycling connections</li></ul>                                                                                                               |

|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | <ul style="list-style-type: none"> <li>• Manage building impacts (e.g. overshadowing, wind, sun access)</li> <li>• Increase tree planting and green infrastructure</li> <li>• Strengthen public transport infrastructure</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Transport</b>                    | <ul style="list-style-type: none"> <li>• Increase frequency and reliability of train services on the Upfield line</li> <li>• Improve tram accessibility and stop upgrades</li> <li>• Address congestion on key roads</li> <li>• Enhance pedestrian and cycling safety, connectivity, and lighting</li> <li>• Support car-free movement through better bike paths and wider footpaths</li> <li>• Suggestions include dedicated tram lanes, removal of on-street parking, and multi-level car parks</li> </ul>                                                                                                                                                             |
| <b>Building</b>                     | <ul style="list-style-type: none"> <li>• Prioritise sunlight, sustainability, and environmentally sensitive design</li> <li>• Support for increased density with concerns around scale, privacy, and overshadowing</li> <li>• Desire for high-quality, architecturally ambitious, and inclusive housing</li> <li>• Emphasis on aesthetics, warmth, and liveability in new developments</li> </ul>                                                                                                                                                                                                                                                                        |
| <b>Heritage</b>                     | <ul style="list-style-type: none"> <li>• Strong support for protecting local heritage and neighbourhood character</li> <li>• Desire to retain Brunswick and Coburg's eclectic, creative, and community-oriented identity</li> <li>• Ensure new development complements existing scale and built form</li> </ul>                                                                                                                                                                                                                                                                                                                                                          |
| <b>Public realm</b>                 | <ul style="list-style-type: none"> <li>• Increase and diversify green spaces, including pocket parks, green corridors, and tree-lined streets</li> <li>• Ensure sunlight access to parks and open spaces is protected in new development</li> <li>• Create inclusive community hubs and spaces for all life stages, with seating, play areas, and shade</li> <li>• Improve safety and amenity in public areas through better lighting and design</li> <li>• Support mixed-use spaces, activation of shopping strips, and retention of creative/community hubs</li> <li>• Ensure infrastructure and public realm improvements keep pace with population growth</li> </ul> |
| <b>Housing growth and diversity</b> | <ul style="list-style-type: none"> <li>• Support for more homes to welcome a growing, diverse community</li> <li>• Emphasis on affordable housing and options for all life stages and abilities</li> <li>• Recognition that population growth supports local jobs and services</li> <li>• Desire for well-designed, sustainable housing that reflects community values</li> </ul>                                                                                                                                                                                                                                                                                        |

It is clear the Brunswick and Coburg communities understand the need for and generally support housing growth. This is reflected in both the Merri-bek Community Vision and the Victorian Government's engagement through the Program. However, alongside this support, the community has expressed a strong desire for development to be of high quality, sustainable, diverse and affordable. There is a clear expectation that at the same time as delivering this growth, the public realm and open spaces will be protected and enhanced, with the growth being matched by investment in infrastructure, particularly in public and active transport, parks and community facilities.

## Phase 2 engagement approach

In this second Phase, the state government has released three maps:

1. What the area currently looks like and the places the community said are important
2. Proposed building heights in the 'core' of the Merri-bek Cluster
3. Proposed 'core' and 'catchment' areas for the Merri-bek Cluster.

Council understands the State Government is primarily seeking feedback on proposed building heights and activity centre boundaries. Accordingly, this technical paper focuses on responding to the publicly available information

Once finalised, these maps will guide new built form planning controls. This includes applying a Built Form Overlay (BFO) to the core (with no change to the existing zone) and rezoning surrounding residential land to the Housing Choice and Transport Zone (HCTZ) across the inner and outer catchments (HCTZ1 and HCTZ2). These draft controls have not been released for community engagement.

It is noted that the representation of Council and community feedback from the Phase 1 engagement on Map 1 is unclear, and it is not evident how this input has informed the development of the height and catchment maps (Maps 2 and 3).

### Addressing gaps in consultation

The Phase 2 engagement material includes no technical reports or explanation on the methodology used to develop heights and the catchment areas, nor any draft planning provisions to understand how they will be implemented. In particular, seeking feedback on building heights in the absence of all other metrics of the proposed BFO, Council and the community cannot be assured about what the outcomes of the program will be. This lacks transparency and is a significant concern.

In Council's Phase 1 submission, Council's key asks in respect to community engagement are still relevant and are:

- Release all technical information to support transparency, context, and informed participation.
- Expand the notification boundary to include all affected areas, including the section of eastern Coburg between Bell Street and Moreland Road.
- Provide timely, accessible materials in plain English and translated formats. This includes the Activity Centre Plan(s) and the draft planning controls.
- Commit to meaningful community participation. This includes offering more community engagement touchpoints, allowing more time for community and Council to digest proposed changes and prepare submissions, and committing to listen and respond to feedback.
- Refer submissions to an independent Advisory Committee with public hearings, broad terms of reference, with the Minister for Planning publicly explaining any deviations from its recommendations.

Council considers that further community engagement is essential to allow feedback on the draft Activity Centre Plan(s) and BFO schedules (and full draft amendment package). While the state government is proposing limited officer input on draft elements, Council emphasises the importance of transparency, where any materials provided for feedback should be made publicly available, reflecting the community's right to be informed and represented.

## **Absence of testing**

To achieve the goal of delivering over 300,000 new homes along Melbourne's train and tram corridors by 2051, the proposed planning controls must be clear, consistent, and achievable. Built form requirements, such as height, setbacks, sunlight access, and separation need to be contextually tested to ensure preferred building heights can realistically be delivered.

While the City of Centres<sup>1</sup> background report includes some modelling, it indicates that except on larger, wider, deeper sites, the maximum building heights for each typology are not achievable. This is concerning given the prevalence of small, narrow, and shallow lots in Brunswick and parts of Coburg, where site depth, laneways and residential interfaces significantly constrain development potential.

Although the BFO encourages land consolidation, this can erode the fine-grain character valued in these areas. Moreover, physical constraints like rear laneways and shallow lots limit achievable height, regardless of consolidation.

If planning scheme heights are not achievable when combined with lot sizes and other important built form requirements it undermines development viability. This will place pressure on decision-makers to compromise key public realm and amenity outcomes. Discretionary height controls need to be feasible, if they are not achievable, they undermine the certainty need to guide development.

Council is concerned that the housing capacity and height aspirations for Sydney Road in Brunswick and Coburg overstate what is realistically achievable. Council recommends that the state government undertake detailed modelling of representative sites within the Merri-bek cluster to test achievable building heights under the full set of proposed controls, along with floorplate assumptions. This will help ensure the planning framework is workable, transparent, and capable of delivering the intended outcomes.

## **Foundation plans**

In the early stages of the Program, DTP prepared 'foundation plans' identifying contextual and valued attributes of each centre, along with place-specific opportunities and constraints. Officers provided feedback on these internally, but the plans have not been publicly released. Instead, only a simplified 'existing conditions' map has been issued for Phase 2 engagement. As a result, Council is concerned that places not explicitly identified by the community may be undervalued in drafting the BFO schedules.

## **Housing capacity targets**

In the Pilot program of the Program, draft Activity Centre Plan(s) were released for Council and community feedback. These plans included a lower and upper range of additional dwellings for each centre. In the current tranche of the Program the number of additional dwellings that is being planned for in the core and catchment of each centre has not been disclosed to Councils or communities. This leaves Council in the dark about what proportion of its overall housing target is being planned for in these priority activity centres.

Whilst the state has revealed the overall number of dwellings it is seeking to deliver is 300,000 homes in 60 centres of which 60,000 were planned for in the 10 pilot centres, not all centres are the same size, or have the same context. This means so different centres will accommodate a different proportion of the overall number. For example, in the 10 Pilot centres, some centres

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<sup>1</sup> City of Centres: Development of typology-based built form controls, Sheppard & Cull, 2024

planned for less than 5% of the 60,000 dwelling target, whilst others provided almost 20% of the overall number.

Brunswick and Coburg Activity Centre's (ACs) are amongst the largest and highest order centres within this Program. Council has an important role to play in partnering with the state government so that these centres can do additional heavy lifting, whilst being mindful of issues that are important to the current Merri-bek community.

It is very difficult to comment on proposed building heights and catchment area extents without access to the state government's Housing Capacity Assessment Platform (HCAP) or information on the housing target capacity they create. In reviewing the draft core building height and catchment areas, Council has sought to be mindful of overall housing capacity implications. However, without access to the HCAP system, planning for growth and its distribution across centres is largely speculative.

Council requests that the state government share its housing capacity targets and housing capacity assessment modelling for the Merri-bek Cluster and work collaboratively with Council in responding to Phase 2 engagement submissions from the Merri-bek community.

## **Building heights and activity centre boundaries**

### **Core Boundary**

There needs to be consistency throughout the planning scheme in relation to the boundary of an activity centre. These boundaries underpin key housing and economic growth policies and are frequently contested in VCAT decisions. Clear identification of whether a site is inside or outside an activity centre is essential for effective decision-making.

To support clarity and transparency, terminology used in maps and overlay schedules must align with the Municipal Planning Strategy (MPS) and the Planning Policy Framework (PPF).

Notably, the core boundaries shown in Brunswick and Coburg do not align with the proposed extent of the BFO (i.e. properties represented on the proposed height maps). For example, Pentridge and industrial land are included in the core boundary but have no proposed height controls, creating uncertainty about the application of built form guidance.

Council is unclear on the state's objective in proposing a core boundary that does not align with the proposed extent of the intended planning control. There is no value in showing an activity centre core boundary on a framework plan in the BFO that will not align with the extent of this overlay on ordinance maps or to land that will not be subject to the associated built form requirements.

This needs to be resolved so that there is clarity for decision makers about where policy and built form directions in the planning scheme apply.

### **Changes to activity centre core areas**

The proposed core boundary in the Phase 2 engagement is an expansion on Merri-bek's current Coburg and Brunswick Activity Centre boundaries, represented by:

- Brunswick** An expansion of the Brunswick AC boundary along the Sydney Road corridor as represented by Amendment C230mbek (Vibrant Brunswick) to capture a group of large parks (collectively known as the Central Brunswick Parklands) and its surrounding Mixed Use Zone land.
- Coburg** A small expansion of the current Coburg AC boundary as defined by Activity Centre Zone (ACZ) to capture a group of Commercial 1 Zone

(C1Z) properties located on the northern side of Moreland Road, between the railway line and Sydney Road.

It is recommended that these core boundaries are modified as reflected in Figure 1. These changes represent both expansion and reductions in areas, as described in Table 2.

**Table 2 – Recommended changes to the Brunswick and Coburg core area**

**Brunswick** Align the core boundary with the Brunswick AC boundary in C230mbek (Sydney Road corridor).

This extent would exclude the Central Brunswick Parklands and surrounding Mixed Use Zone (MUZ) sites, sites that are largely developed (or in benefit of a planning permit), disconnected from the core commercial and civic activity along Sydney Road and located more than 600m from the rail corridor.

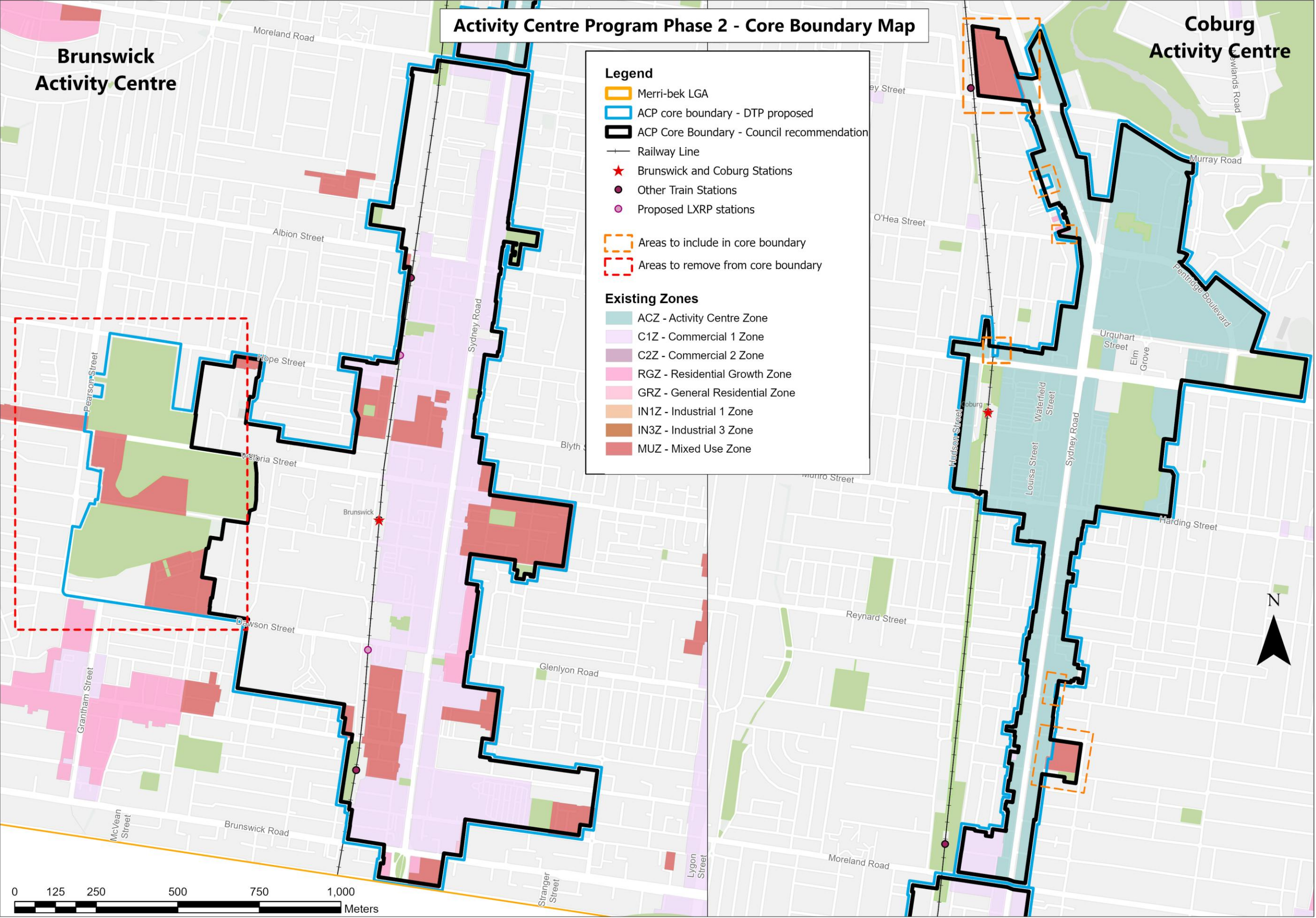
**Coburg** Expanding the core boundary to include two large MUZ sites at 31 The Avenue and 14–22 Gaffney Street, Coburg located adjacent to the current Coburg AC extent. These sites are well-positioned for inclusion due to their strategic location, development opportunity and compatibility with the intended built form outcomes.

- 31 The Avenue has an approved permit for 8-storey development, demonstrating its suitability for higher-density development. Inclusion would also resolve the current lack of built form guidance to the site and ensure consistent built form guidance suitable to the scale envisaged for the site
- 14-22 Gaffney Street is a large, strategically located adjacent to Batman Station and aligns with the scale and character of the core area.

Including all properties within the current Coburg ACZ and the full extent of 613–625 and 653 Sydney Road Coburg to have a consistent zone application to their entire sites.

Clarifying the status of the Pentridge area, as its inclusion in the core boundary without being in the BFO creates inconsistency.

Figure 1 - Map showing recommended changes to the core AC boundaries



## Heights in the Activity Centre Core

There has been no urban design analysis presented in Phase 2 engagement to justify the heights beyond what is outlined in C230mbek and the Coburg ACZ. Council cannot evaluate the appropriateness of the proposed building heights in isolation without this information and other essential urban design parameters, such as:

- street wall height and upper-level setbacks
- side and rear setbacks
- setbacks to sensitive interfaces
- building separation
- sunlight to streets and parks.

These elements work together to determine the feasible built form and overall scale on a site.

The heights shown on the maps represent an aspirational vision and are unlikely to be achievable in many locations due to constraints such as heritage, limited site dimensions (width, depth, and area), the fine-grain lot pattern along narrow streets, and the need to maintain adequate sunlight to the key pedestrian network and parkland. Without consideration of these factors, there is a risk that the mapped heights may mislead the development industry about the realistic scale of development that can be supported.

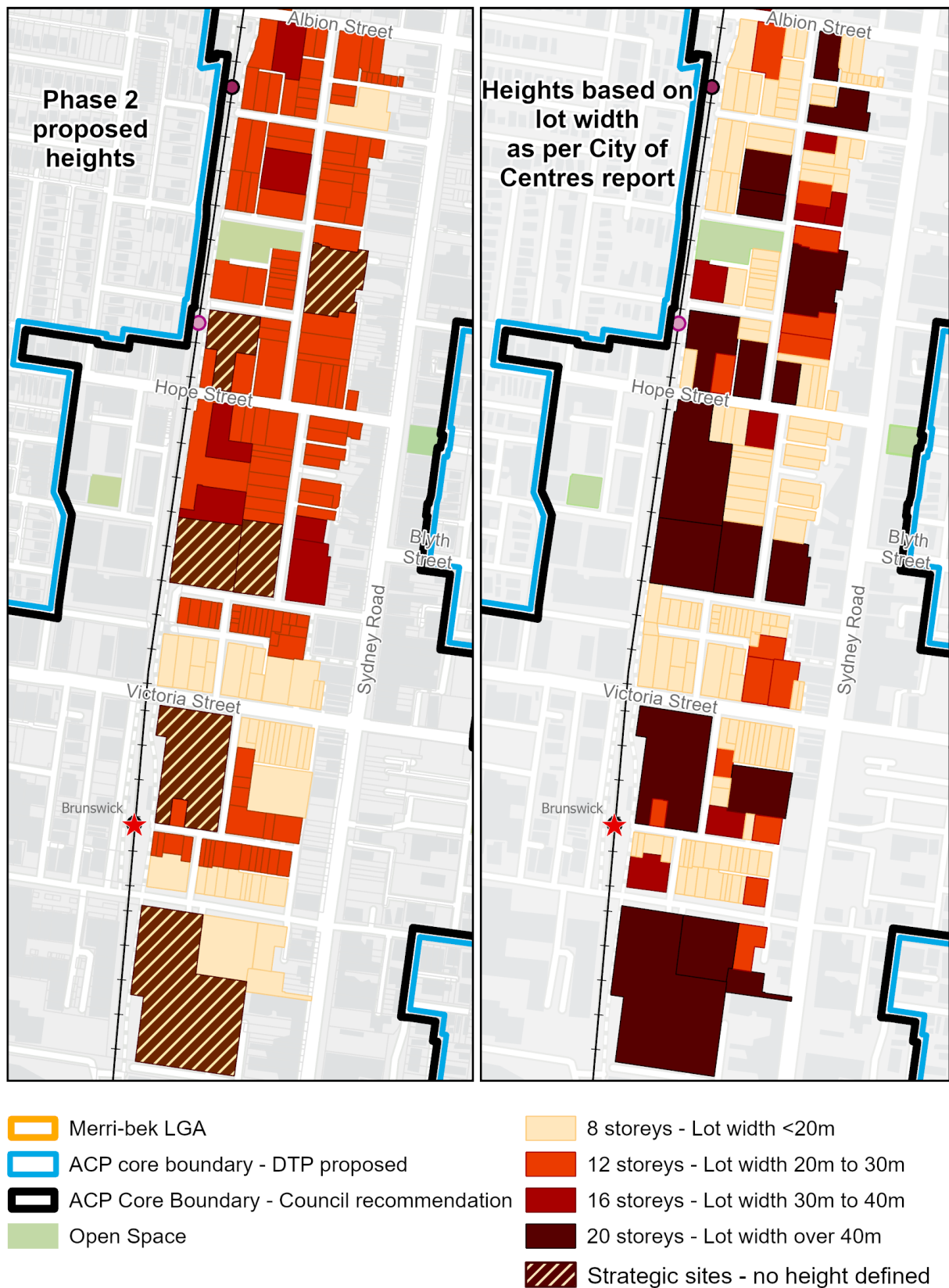
The City of Centres offers a methodology in Figure 2 related to maximum heights to lots in a range of 8 storeys to 20 storeys. Using this methodology for a desktop comparison with the Phase 2 proposed heights in the off-corridor section of the Brunswick AC between Albion Street and Victoria, it illustrates a substantial difference between the two (Figure 3). In particular, that there are a substantial number of narrow lots, and that even with some lot consolidation, the heights are likely unachievable given site sizes and the context.

Maximum building height

| Precinct                          | Maximum Height (m) |     |                          |        |
|-----------------------------------|--------------------|-----|--------------------------|--------|
| AC type                           | 1                  | 2   | 3                        | 4      |
| Heritage Main Street Core (H)     | 21m                |     | 27m                      |        |
| Non-Heritage Main Street Core (N) | 21m                | 27m | 40m                      |        |
| Fringe (F)                        | 21m                |     | 27m                      |        |
| Limited Sensitivities (S)         | 21m                | 27m | Frontage                 | Height |
|                                   |                    |     | S3a: < 20m               | 27m    |
|                                   |                    |     | S3b: between 20m and 30m | 40m    |
|                                   |                    |     | S3c: between 30m and 40m | 53m    |
|                                   |                    |     | S3d: > 40m               | 66m    |
| Large Opportunity Sites (L)       | 21m                | 27m | 40m                      | 66m    |
| Enclosed Shopping Centres (C)     | 21m                | 27m | 40m                      | 66m    |
| Residential (R)                   | 17m                |     |                          |        |

Figure 2 – City of Centres maximum building height matrix for each six typologies (metrics highlighted)

**Figure 3 – Off-corridor area in the Brunswick AC comparing the Phase 2 proposed heights with City of Centres maximum heights based on lot width methodology to the off-corridor area in the Brunswick AC**



It is therefore imperative that proposed deemed to comply heights are linked to compliance with standards on street wall height, upper-level setbacks, side and rear setbacks, setbacks to sensitive interface, building separation and sunlight protection.

## Recommended changes to core heights

Figures 4 & 5 illustrate Council's recommended changes to building heights within the AC's core, with Table 3 providing additional rationale for the changes. This feedback should be considered indicative, as it has been provided without the benefit of comprehensive testing against key urban design metrics that would confirm the heights are achievable.

Council's evaluation of the heights considers the City of Centres report, the site contexts and philosophy of this program to recommend heights that consider:

- Contextual sensitivity and protection:
  - Sensitive interfaces to parks to ensure sunlight to parks can be maintained
  - Areas on the fringe of precincts that are within a low scale residential context
  - Supporting the retention of existing heritage streetscapes and landmarks
- Consistency and fairness in application
  - Consistent application of heights in similar contexts across the AC's, especially within same streets and blocks where possible.
  - No reduction to heights based on existing height controls
- Comprehensive coverage and accuracy
  - All developable sites to include a preferred maximum height, including those marked as strategic sites and sites shown incorrectly as parks
  - Capturing all sites within the current Brunswick and Coburg AC extents

| Table 3 – Council's rationale for recommended height changes |                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Location Map ID                                              | Theme                                    | Rationale for the change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1                                                            | <b>Residential context and interface</b> | <p>These areas sit at the edges of the Activity Centre core and are located off the main corridor. They function as transitional residential precincts between higher-density zones and surrounding lower-scale residential neighbourhoods. In some cases, they are physically separated from the key activity areas by railway lines or parkland.</p> <p>These precincts align with the 'residential precinct' typology in the City of Centres report, which supports a maximum building height of six storeys. If they were not already within Brunswick or Coburg Activity Centre, they would be well suited to inclusion in the inner catchment of the Housing Choice and Transport Zone (HCTZ) where moderate change is expected due to their residential character, smaller lot sizes, sensitive interfaces, and constrained street widths.</p> |

|   |                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | <b>Large site adjacent to train station</b> | 14-22 Gaffney Street Coburg is suitable to be within the Coburg AC core boundary given its size and excellent access to both train and tram services. It is a large site of more than 26,000m <sup>2</sup> in size and is positioned next to the Batman railway station and a short distance to tram services along Sydney Road. Its orientation and location with a robust southern and western interfaces suit the scale envisaged for the Coburg AC and aligned with 664-716 Sydney Road Coburg. The proposed height in HCTZ1 is lower than the preferred height in the existing scheme.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3 | <b>Consistent height application</b>        | <p>Recommending a consistent height be applied to these sites and areas as follows:</p> <ul style="list-style-type: none"> <li>• 737-757 Sydney Road Coburg should reflect the same height as 664-716 Sydney Road Coburg and 14-22 Gaffney Street Coburg given their similar contexts and limited sensitivities.</li> <li>• 200-216 Sydney Road Coburg should match the 12-storey height directed to this section of Sydney Road, which is consistent with the scale of the apartment building currently being constructed on that site.</li> <li>• The off-corridor precinct in Brunswick between Albion and Victoria Street to have a consistent height application given their similar context and for streetscape consistency.</li> <li>• Merri Street and Dods Streets Brunswick present with constrained urban environment characterised by narrow streets and predominantly small lots that will constrain development potential for large developments. A clear example is the 4-5 storey apartment building at 18 Merri Street. Despite being on a large site, the buildings scale was influenced by the need to manage off-site impacts, particularly on surrounding narrow streets, nearby parks and existing housing.</li> <li>• Properties on the west side of Frith Street to have a consistent height application across the entire street.</li> <li>• 201 Albert Street Brunswick has been recently developed with a 6-storey apartment building that pushes the boundary on scale to ensure the streetscape, nearby parks and surrounding dwellings amenity can be maintained.</li> </ul> |
| 4 | <b>Alignment with the Coburg ACZ</b>        | The Coburg ACZ currently directs a higher preferred height than what is proposed on the height map. The height should be increased to align with the heights in the Coburg ACZ.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

|           |                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5</b>  | <b>Strategic sites and adjoining sites with capacity for taller buildings</b> | A masterplan is not necessary to facilitate a suitable scale to Strategic Sites. A preferred height direction along with pedestrian connections, streetwall heights and upper-level setbacks, setbacks to sensitive interfaces, building separation and other design standards is adequate to guide a suitable development scale. The height recommended aligns with the context and/or heights recommended on adjacent properties. |
| <b>6</b>  | <b>Missing height direction</b>                                               | These sites have no height direction. The heights suggested on the map match that of adjacent sites.                                                                                                                                                                                                                                                                                                                                |
| <b>7</b>  | <b>Sensitive interfaces and alignment with recent approvals</b>               | Recent approvals demonstrate that a 12 storeys building strikes the right balance between a scale that can facilitate housing at moderate scale whilst protecting sunlight to important adjacent parkland.                                                                                                                                                                                                                          |
| <b>8</b>  | <b>Large site adjacent to AC core</b>                                         | 31 The Avenue Coburg is suitable to be pulled into the Coburg AC core boundary given its size, location adjacent to the Coburg ACZ and proximity to train and tram services. It has a recent 8 storey apartment approved on the site that is more consistent with the aspirations of the core of the Coburg AC than for catchment areas. The proposed height in HCTZ1 is lower than the height of the recent approval.              |
| <b>9</b>  | <b>Heritage limitations</b>                                                   | These are heritage streetscapes and very small lots where scale of future buildings will be constrained to respect important heritage fabric.                                                                                                                                                                                                                                                                                       |
| <b>9</b>  | <b>Large sites within residential contexts</b>                                | 11 Thomas Street Brunswick is a large site in a constrained residential context. Protecting the streetscape amenity and that of existing dwellings constrains development, in potential and the heights recommended reflect a more realistic and sensitive scale.                                                                                                                                                                   |
| <b>10</b> | <b>Sites recommended to be excluded from Core AC boundary</b>                 | The development potential of these sites is very limited given they all contain modern apartments or townhouses. Whilst these sites are recommended to be excluded from the core AC boundary, the heights recommended on the map reflect the scale achievable given their sensitive interfaces with parkland, and in the case of the Hoffman Brickworks, prominence of key heritage elements of state importance.                   |
| <b>11</b> | <b>Industrial land</b>                                                        | The industrial-zoned portions of properties fronting Moreland Road and Sydney Road should be excluded from the height map and not subject to built form controls. These areas are not suitable for residential development due to zoning restrictions and their contribution to established industrial precincts/activity.                                                                                                          |

Figure 4 – Map comparing Phase 2 proposed heights and Council recommended heights for the Coburg AC

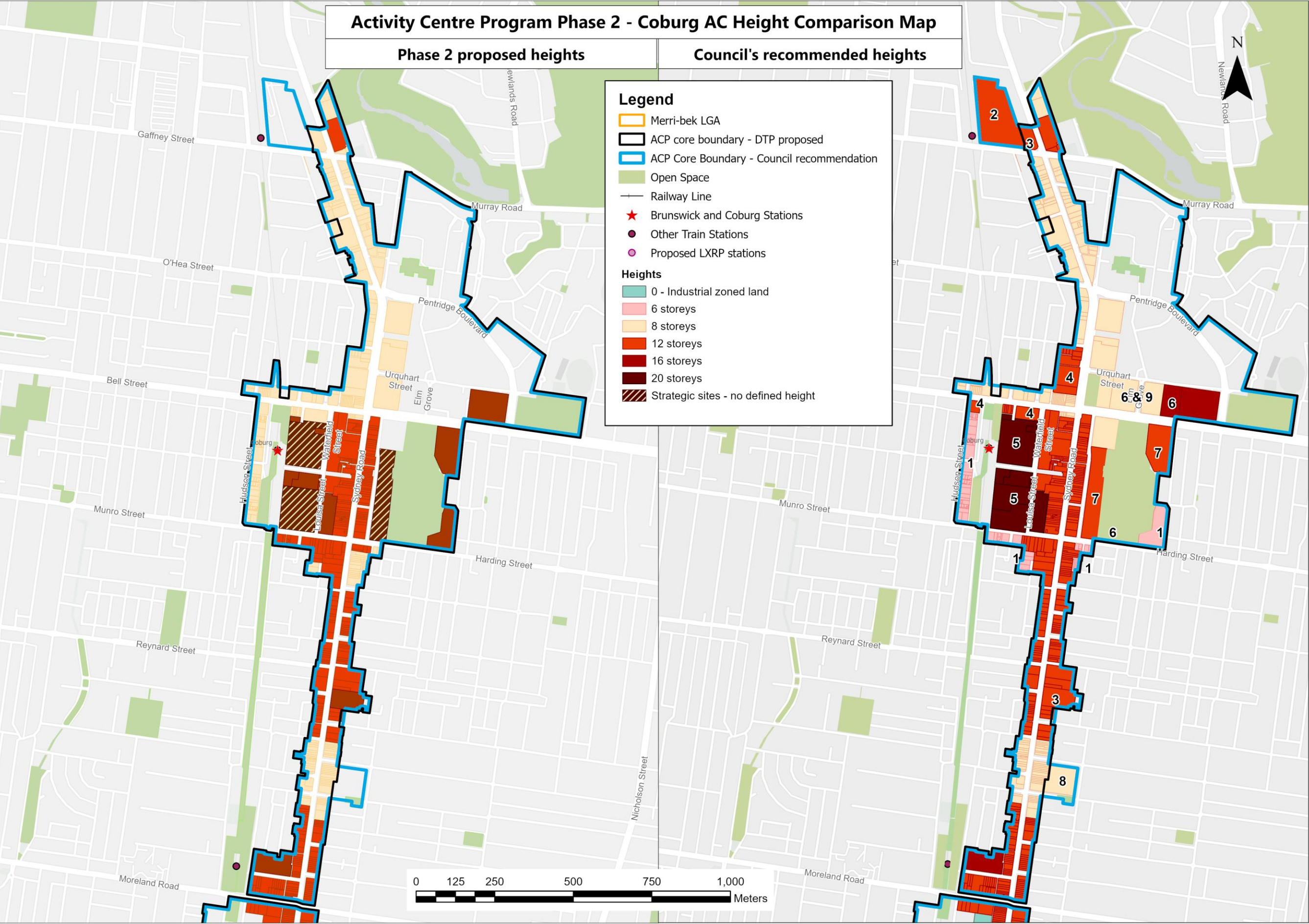
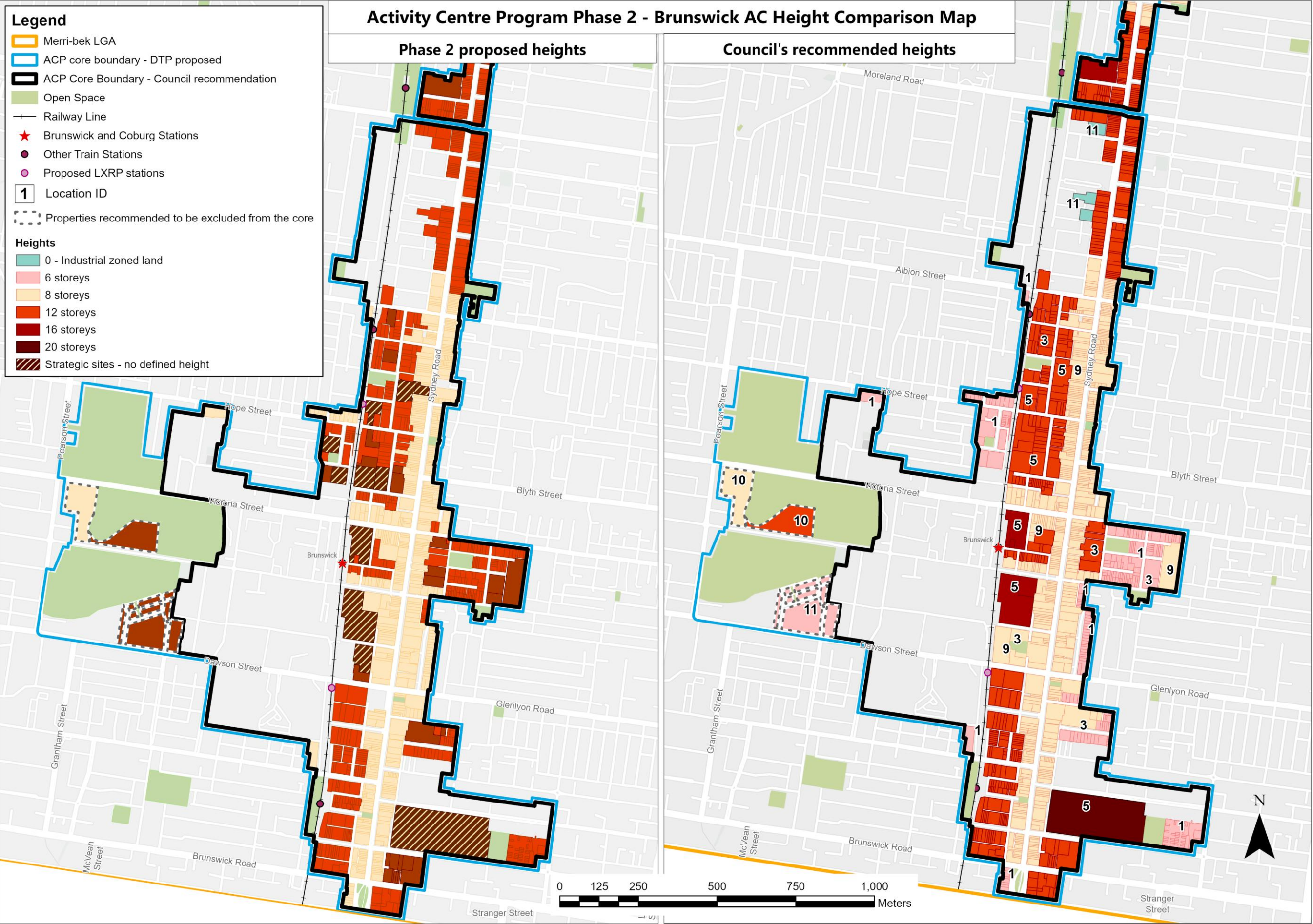


Figure 5 – Map comparing Phase 2 proposed heights and Council recommended heights for the Brunswick AC



## Housing Capacity Core

Council generally supports the overall level of growth but suggests moderation in some areas. Council has undertaken a housing capacity assessment of the Activity Centres core, comparing existing planning scheme heights, the State Government's Phase 2 proposal, and Council's position on heights.

The assumptions have been informed by presentations and discussions with the HCAP team. They are the closest approximation Council has of likely capacity considerations.

| Table 4 – Housing Capacity Assessment assumptions |                    |
|---------------------------------------------------|--------------------|
| Attribute                                         | Assumptions - Core |
| Development Type                                  | Apartments         |
| Site coverage                                     | 100%               |
| Building efficiency                               | 85%                |
| Average apartment size                            | 90 sqm             |
| Height                                            | Scenario dependent |
| Commercial                                        | Ground floor only  |

The results in Tables 5-8 below show that Council's option delivers only a 5% reduction in overall capacity compared with the Department of Transport and Planning's (DTP) proposal, while achieving a more balanced distribution of growth between Coburg (45%) and Brunswick (55%), compared with DTP's 39% and 61%.

| Table 5 – Housing Capacity Assessment (All sites dwellings) |         |        |          |
|-------------------------------------------------------------|---------|--------|----------|
| Suburb                                                      | DTP     | MCC    | Existing |
| Brunswick                                                   | 61,030  | 52,874 | 27,868   |
| Coburg                                                      | 39,570  | 42,818 | 22,580   |
| Total                                                       | 100,600 | 95,692 | 50,448   |
|                                                             | 100%    | 95%    | 50%      |

| Table 6 – Housing Capacity Assessment (All sites percentage) |      |      |          |
|--------------------------------------------------------------|------|------|----------|
| Suburb                                                       | DTP  | MCC  | Existing |
| Brunswick                                                    | 61%  | 55%  | 55%      |
| Coburg                                                       | 39%  | 45%  | 45%      |
| Total                                                        | 100% | 100% | 100%     |

| Table 7 – Housing Capacity Assessment (Excluding lots < 200 sqm dwellings) |        |        |          |
|----------------------------------------------------------------------------|--------|--------|----------|
| Suburb                                                                     | DTP    | MCC    | Existing |
| Brunswick                                                                  | 57,316 | 49,674 | 25,903   |
| Coburg                                                                     | 38,043 | 41,269 | 21,730   |
| Total                                                                      | 95,359 | 90,943 | 47,633   |
|                                                                            | 100%   | 95%    | 50%      |

| Table 8 – Housing Capacity Assessment (Excluding lots < 200 sqm dwellings percentage) |      |      |          |
|---------------------------------------------------------------------------------------|------|------|----------|
| Suburb                                                                                | DTP  | MCC  | Existing |
| Brunswick                                                                             | 60%  | 55%  | 54%      |
| Coburg                                                                                | 40%  | 45%  | 46%      |
| Total                                                                                 | 100% | 100% | 100%     |

These capacity figures are preliminary estimates based on the best available information and should be considered the upper limit of housing capacity. Once more information becomes available and a full capacity assessment is undertaken, these figures will decrease.

However, it is considered likely that the Core, together with the catchment areas, will contribute most (if not all) of Merri-bek's 2051 Housing Target of 69,000 dwellings.

## Catchment Areas

As mentioned previously, the Phase 2 engagement material provides no information to understand the application or rationale of the proposed inner and outer catchments for each AC, including the housing capacity it aims to facilitate. Without this, it is difficult to meaningfully consider the suitability of the catchment areas.

Nevertheless, Council has concerns with the ability for sites to achieve the anticipated scale directed by the catchments, even with lot consolidation. The proposed inner and outer catchments for these AC's covers some of Merri-bek's oldest streets. These streets included a valued fine grain pattern made up of small and narrow lots within a network of narrow streets and often part of heritage streetscapes, features that constrain development possibility not only in scale but the ability for multi-dwelling developments of any typology.

## Recommended changes to catchment areas

Whilst Council considers the heights represented in the catchment plans are largely unachievable, Council's evaluation of the inner and outer catchments considers the following:

- Importance of preserving identified heritage streetscapes and that this reduces the feasibility of lot consolidation, limits housing capacity, and constrains future development scale.
- Importance of consistent controls along streetscapes to support good urban design and cohesive streetscape outcomes.

Figure 6 maps heritage precincts and small lots against the proposed catchment areas to help illustrate the extent of heritage in and around the Brunswick and Coburg AC and to appreciate this constrained setting.

Council recommends changes to the inner and outer catchments, illustrated in Figure 7 & 8. These changes include:

- Removing heritage precincts from the inner catchment and including them in the outer catchment
- Removing areas with high concentration of lots under 300 m<sup>2</sup> in size in the inner catchment
- Resolving isolated pockets of inner catchment that are surrounded by outer catchment areas

Table 8 illustrates these types of recommended changes.

**Table 8 – Highlighting the type of changes council recommends to the catchment areas**

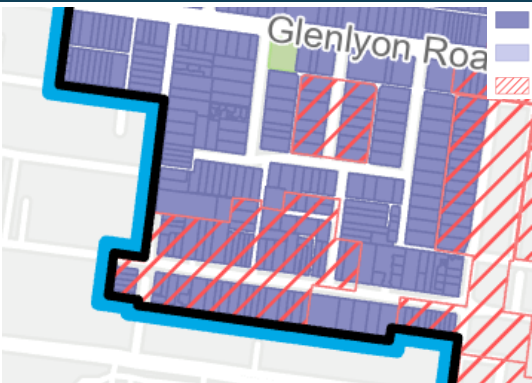
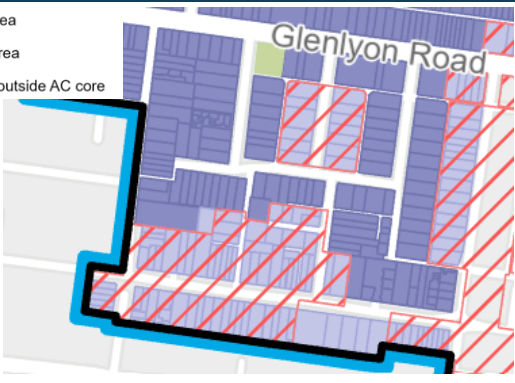
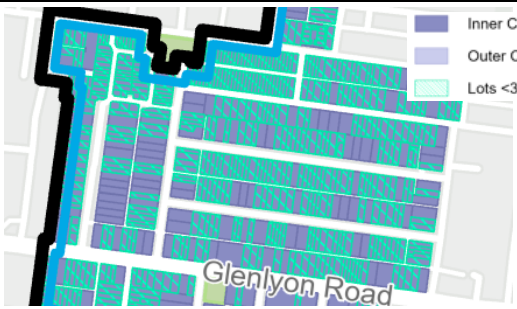
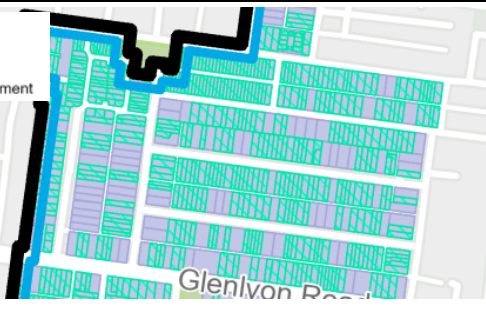
|                                                                                                                                                                                                       |                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p>Current extent show heritage precincts within the inner catchment area of Brunswick AC</p>                     |  <p>Showing properties within heritage streetscapes in the outer catchment, including adjacent properties to ensure consistent scale in the streetscape.</p> |
|  <p>Current extent shows high concentration of lots less than 300 m<sup>2</sup> in size in the inner catchment</p> |  <p>Showing an area dominated by small lots in the outer catchment to respond to the constrained setting</p>                                                 |

Figure 6 – Map illustrating the extent of heritage precincts and small lots around the AC

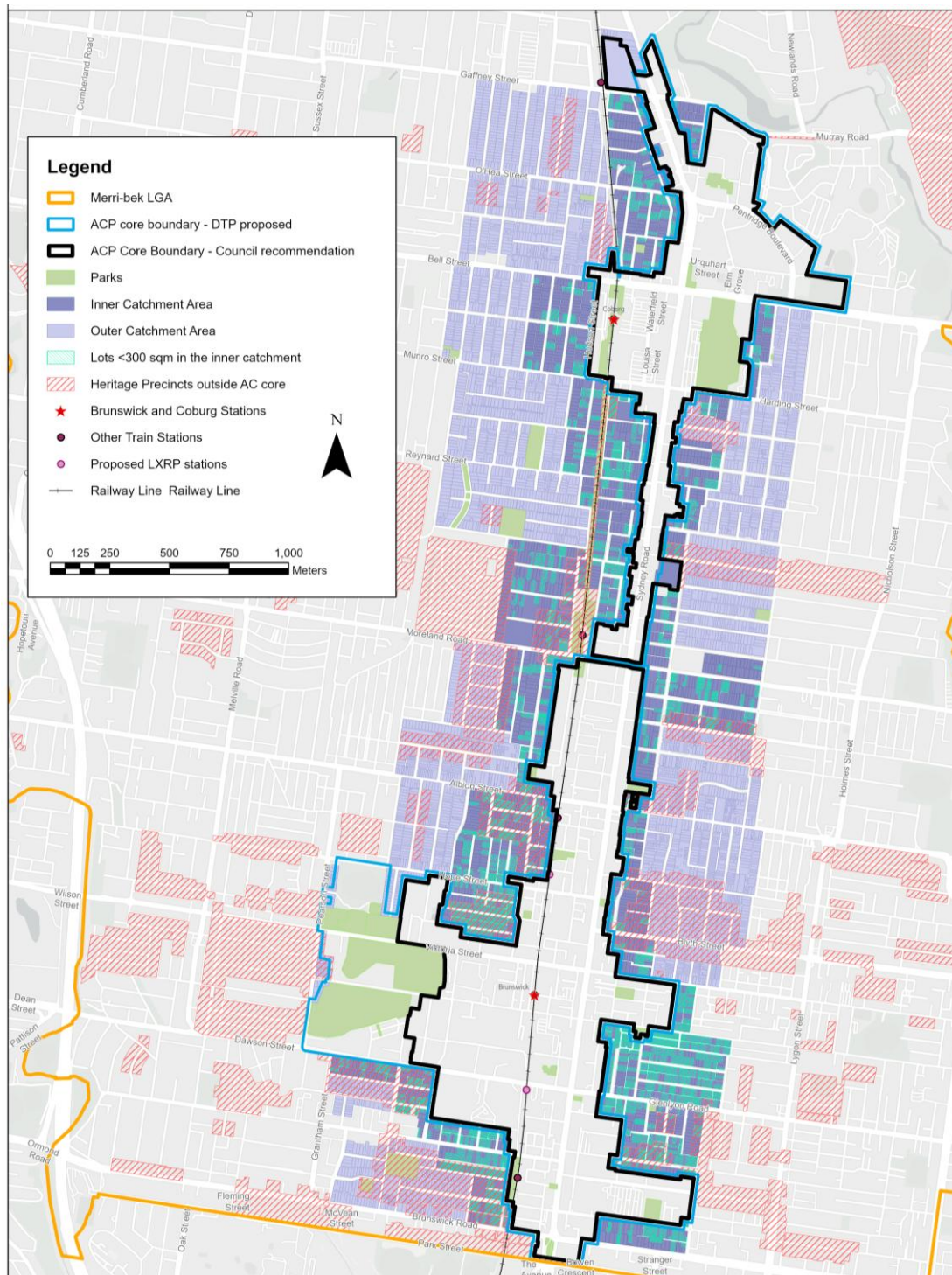


Figure 7 – Map comparing Phase 2 catchment areas with Council recommended catchment areas for the Coburg AC

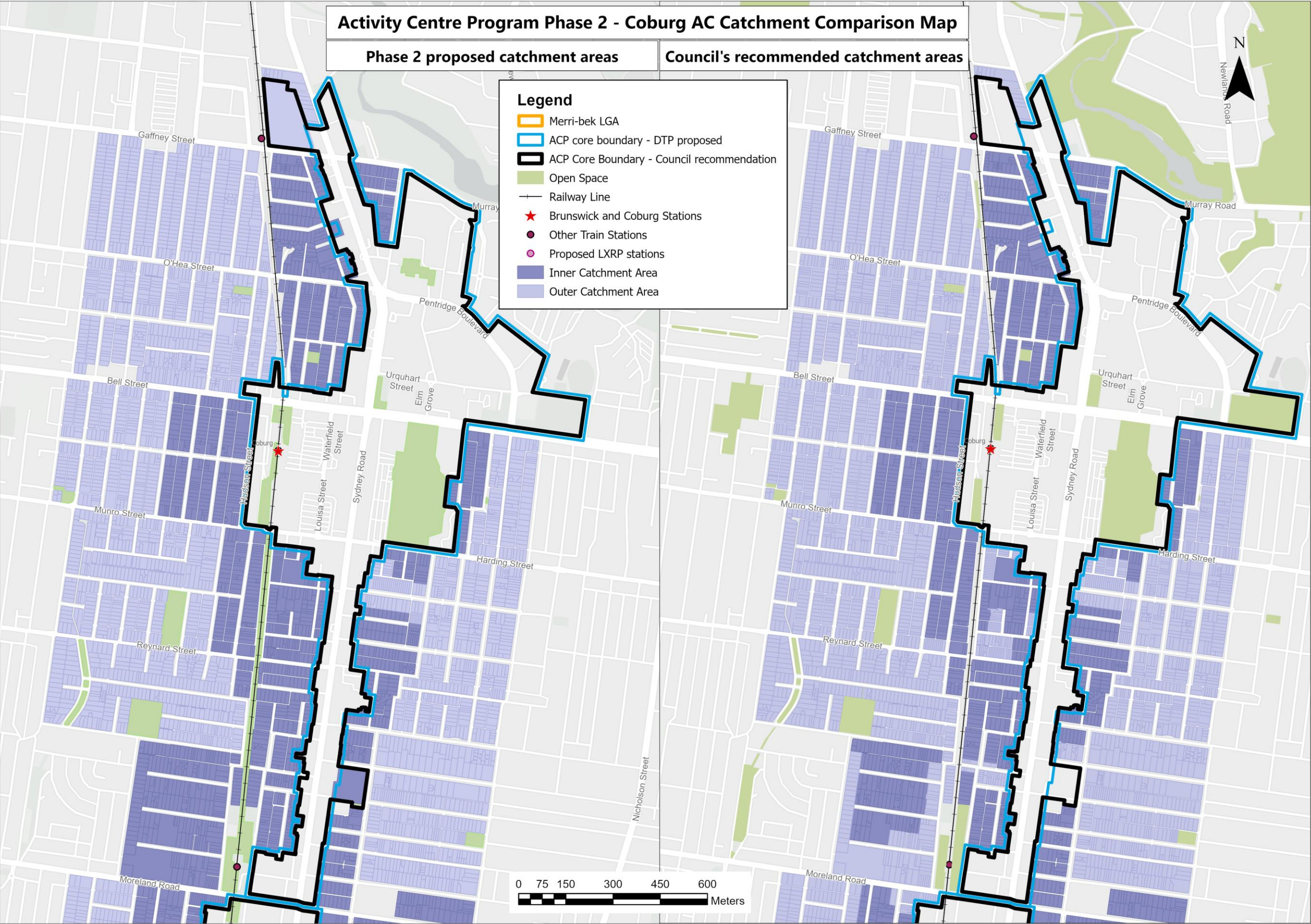
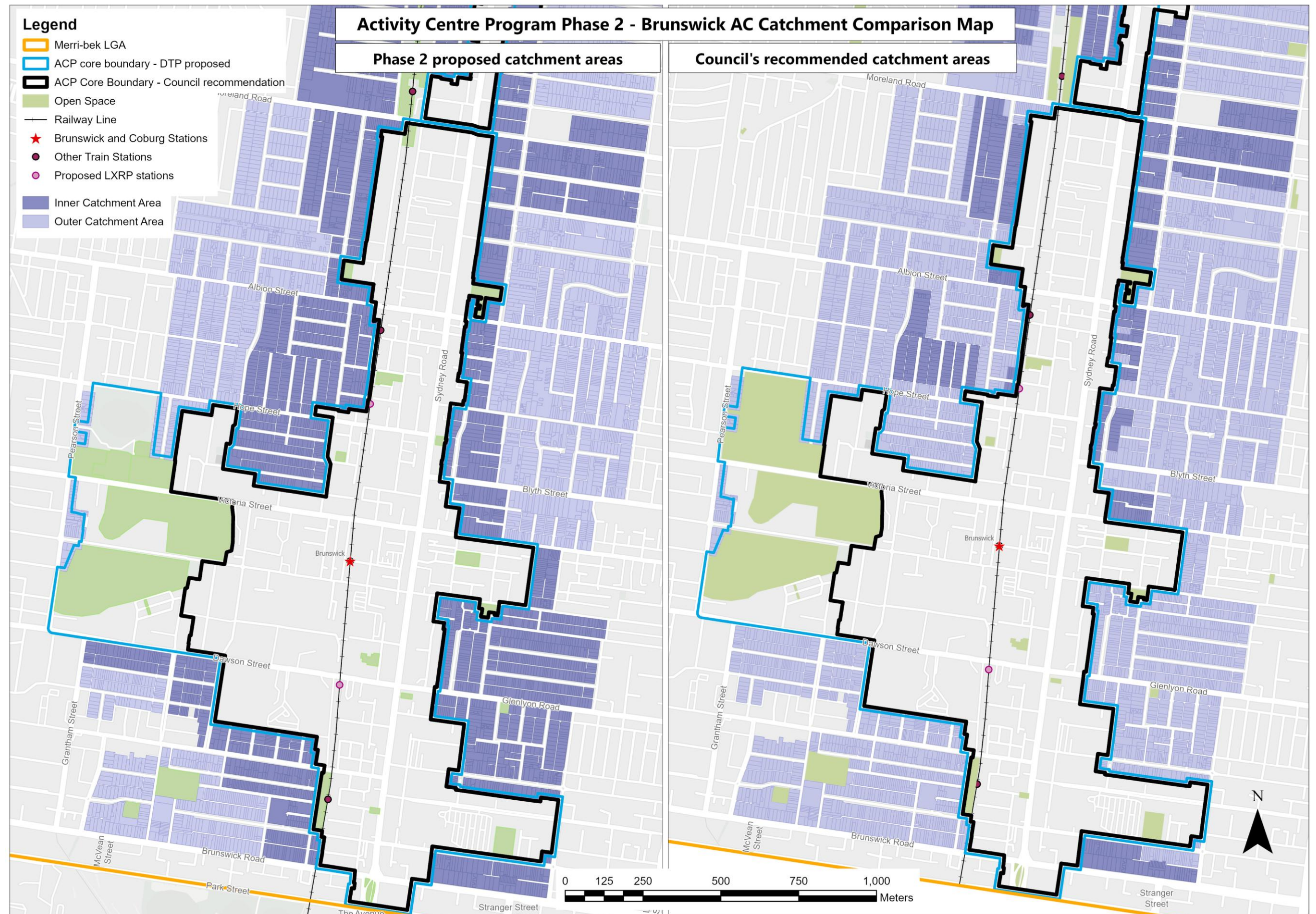


Figure 8 – Map comparing Phase 2 catchment areas with Council recommended catchment areas for the Brunswick AC



## Local metrics to support well designed centres

The BFO may contain requirements in relation to building typology and future character, overshadowing of open space, overshadowing of key pedestrian streets, landscaped setbacks, active frontages, pedestrian connections, weather protection, vehicle access, waste and loading access and signs. The schedules to the BFO identify specific metric requirements and where they are applicable.

### Moreland Apartment Design Code

Some elements of the Moreland Apartment Design Code (MADC) were introduced into the Merri-bek Planning Scheme by Amendment C142 in December 2017 and has been driving positive design and amenity outcomes in apartment developments since its introduction.

MADC standards related to building separation and light wells are contained in local policy at Clause 15.01-2L (see Appendix 1). These are important standards to ensure:

- There is adequate daylight and sunlight access to habitable rooms, private open space areas, communal open space areas and open space areas
- Buildings are located and designed to reduce overlooking into habitable rooms and private open space areas
- Quality outlook for residents
- The above objectives are shared equitably across property boundaries

These metrics were robustly tested by expert evidence at Panel and achieve daylight outcomes aligned with local energy efficiency and environmentally sustainable development objectives and strategies in the PPF.

Council requests that these building separation and light well standards be included in the BFO for each Activity Centre. These standards are well-established, have been tested in practice, and are routinely met by the Merri-bek development industry demonstrating their usability and compliance.

## Operation of the Planning Scheme

### Importance of Consistency

#### Terminology

The use of the term 'Train and Tram Zone Core Boundary' in the Phase 2 engagement material is misleading. Council understands that the Program proposes a Built Form Overlay in the core areas and does not propose to rezone land. However, the term 'zone' implies the introduction of a new planning zone, which is not reflected in Plan for Victoria or the Planning Policy Framework (PPF). This inconsistency in terminology risks confusion among stakeholders.

#### Built form guidance for Pentridge

The contribution and built form considerations of Pentridge within the Coburg AC also needs further consideration. Pentridge is substantial redevelopment area that is not only close to shops, services and a variety of public transport services (train, tram and bus routes) but is part of the Coburg Activity Centre driving investment and new housing. It is also subject to the same built form guidance contained in the Coburg Activity Centre Zone (ACZ) as the remainder of the properties in the core Coburg AC area.

The rationale behind Pentridge's inclusion in the core boundary but exclusion from the height maps and intended BFO is unclear. Its exclusion from the BFO will in fact result in disjointed built form guidance to the Coburg AC. It is also unclear how the Coburg ACZ can be modified to provide built form guidance to Pentridge but not to the remainder of the activity centre properties.

Including Pentridge in the height maps and subsequent BFO makes sense. This would be a simple exercise of translating the heights in the current ACZ into height maps and the BFO framework. This will ensure all properties within the Coburg AC are subject to the same built form guidance, which is consistent with the purpose of this Program.

Should the AC Program continues to exclude Pentridge, it is imperative that the Victorian Government engage meaningfully with Council to develop a mutually agreeable amendment to the Coburg ACZ to ensure it will be workable.

### **Residential zone schedules**

A small number of sites within the boundary of the proposed activity centre core are in residential zones that have specific height requirements in zone header provisions and/or schedules. The proposed building heights in this Program do not align with these zone height requirements. This will need to be resolved so that different directions about building height are not given in different clauses of the scheme.

### **Consulting on full suite of planning scheme changes**

Phase 2 engagement does not include any draft planning scheme provisions or changes. As mentioned previously, Council understands that there will be limited engagement on a draft BFO with Council only and not accessible to the community prior to implementation.

Implementing the information on the height and catchment maps will require substantial changes to the Merri-bek Planning Scheme to ensure there are no conflicts only consistency within the scheme. These changes are much more widespread than applying Housing Choice and Transport Zone to their catchments and the BFO to the core of the Activity Centres with a local schedule to guide built form requirements. A couple of examples of other parts of the scheme that need addressing have been raised previously related to the MPS, PPF, existing zone height conflicts and how the Coburg ACZ will operate. There are likely many others.

There is currently no evidence that the State has identified which other parts of the planning scheme will require amending to ensure the AC Program does not create conflicting policies. This is a significant task, and if not done properly, it will fall to Council to resolve through separate amendments, placing further pressure on Council's already constrained resources.

Council requests that:

- The Victorian Government work collaboratively with Council to develop the BFO schedules and jointly determine which parts of the scheme require amendment, including the format and approach to those changes, in a way that is mutually agreed.
- Any planning scheme changes to implement the AC Program be subject to Phase 3 engagement, to ensure both Council and the community have the opportunity to review and provide feedback in a meaningful way.

## **Climate response**

Ministerial Direction 22 – Climate Change Consideration (MD22), gazetted on 11 September 2025, outlines what planning authorities must consider to meet their legal duty under the *Planning and Environment Act* to address climate change when preparing or amending planning schemes. The AC program is a large precinct scale transformational program that will have considerable implications to areas of Merri-bek already experiencing climate impacts exacerbated by urban renewal and consolidation.

Council requests that a Climate Change Assessment be prepared in line with MD22 and supporting guidelines to identify local built form standards and supporting policy for the BFO to help mitigate climate impacts.

## **Conclusion**

Merri-bek City Council supports directing housing growth to the well-serviced Brunswick and Coburg Activity Centres, provided it is underpinned by strong, evidence-based planning controls. Phase 2 materials set important directions, but the absence of technical reports, modelling, and draft controls limits Council's and the community's ability to provide fully informed feedback. Without this information, there is a risk that the proposed heights, boundaries, and catchments are unachievable, undermining confidence in the Program and placing liveability, design quality, and amenity at risk.

Council urges the Victorian Government to release the technical evidence, refine core and catchment boundaries, and undertake transparent testing of proposed controls against key built form metrics. Investment in public transport, infrastructure, and climate resilience measures must accompany growth, and proven local design standards should be embedded in the Built Form Overlay. Council remains committed to working in partnership with the State to ensure the Program delivers affordable, diverse, and sustainable housing while protecting the unique character and liveability of Brunswick and Coburg for current and future communities.

# Appendix 1 – Moreland Apartment Design Standards

## Local building setback and separation standards

The building setback and separation standard outlined in Table 1, 2 & 3 are supported by strategies and decision guidelines.

### Building setback and separation strategies

Design buildings to:

- Allow adequate daylight to living rooms and bedrooms.
- Provide opportunities for open space and landscaping areas.
- Reduce overlooking into habitable rooms and private open space areas through location and design
- Provide a reasonable outlook from living areas.
- Enable the reasonable future development opportunities of adjoining sites.
- Manage the amenity impacts to adjoining sites.
- Achieve a greater level of privacy and higher levels of daylight compared to bedrooms

### Standard 1 – Building setback and separation

| Table 1 - Building setbacks to the side and rear boundary |                                                 |                             |
|-----------------------------------------------------------|-------------------------------------------------|-----------------------------|
| Building height                                           | Living room or Main balcony outlook to boundary | Bedroom outlook to boundary |
| Up to 4 storeys<br>(12 meters)                            | 6 meters                                        | 3 meters                    |
| 5-8 storeys<br>(up to 25 meters)                          | 9 meters                                        | 4.5 meters                  |
| 9 or more storeys<br>(over 25 meters)                     | 12 meters                                       | 6 meters                    |

| Table 2 – Building setbacks to a lane |                                     |                          |
|---------------------------------------|-------------------------------------|--------------------------|
| Building height                       | Living room or Main balcony outlook | Bedroom outlook          |
| 2 storeys<br>(9 meters)               | 0 meters (from boundary)            | 0 meters (from boundary) |
| 3-8 storeys<br>(up to 25 meters)      | 6 meters (from lane centre line)    | 4.5 meters               |
| 9 or more storeys<br>(over 25 meters) | 9 meters (from lane centre line)    | 6 meters                 |

| <b>Table 3 – Building separation from another building within a site</b> |                                                                                   |                                           |                                                             |                                                        |                                      |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------|--------------------------------------|
| <b>Building height</b>                                                   | <b>Living room or Main balcony outlook to Living room or Main balcony outlook</b> | <b>Bedroom outlook to bedroom outlook</b> | <b>Living room /Main balcony outlook to bedroom outlook</b> | <b>Living room /Main balcony outlook to no outlook</b> | <b>Bedroom outlook to no outlook</b> |
| <b>Up to 4 storeys (12 meters)</b>                                       | 12 meters                                                                         | 6 meters                                  | 9 meters                                                    | 6 meters                                               | 3 meters                             |
| <b>5-8 storeys (up to 25 meters)</b>                                     | 18 meters                                                                         | 9 meters                                  | 13.5 meters                                                 | 9 meters                                               | 4.5 meters                           |
| <b>9 or more storeys (over 25 meters)</b>                                | 24 meters                                                                         | 12 meters                                 | 18 meters                                                   | 12 meters                                              | 6 meters                             |

### **Decision guidelines - Building setback and separation**

Consider as relevant:

- Whether the building setback requirements specified in Tables 1, 2 and 3 have been achieved:
  - Including to the side or rear boundary, a lane or another building within the same site.
  - As measured from glazing line or the external edge of any balcony (whichever is the lesser) to the property boundary for setbacks specified in Table 1.
  - As measured from glazing line or the external edge of the balcony (whichever is the lesser) to the lane centre line for setbacks specified in Table 2.
  - As measured from glazing line or the external edge of the balcony to the glazing line or external edge of the balcony, between buildings, whichever is the lesser for setbacks specified in Standard 3.
- The reasonable future development opportunities for adjoining sites where a building does not achieve the building setback requirements specified in Tables 1, 2 and 3.
- Whether building separation is not required provided:
  - There is no outlook from a living room to a side or rear boundary; and
  - It does not affect the reasonable future development opportunities of the adjoining site.
- Whether an existing residential development on an adjoining site does not meet the distances specified in Tables 1, 2 and 3, siting new development to achieve a comparable adequate setback (from a minimum of one metre and a maximum of three metres). The building setback requirements apply from the first level of residential use.
- Whether existing developments have reasonably incorporated access to daylight on their own site.
- Requiring no building separation where a continuous street wall is encouraged under the relevant place-based control to the extent necessary to comply with that control.

## Daylight Access - Light wells

### Light wells strategy

Where bedrooms are serviced by a lightwell ensure they are of sufficient size to allow adequate daylight.

Design and locate windows in light spills to protect the privacy of occupants without relying solely on screening including through:

- Staggering lightwells to avoid direct overlooking into existing bedroom windows in separate dwellings.

### Standard 2 – Light wells

All lightwells that provide daylight access to bedrooms:

- Staggered to avoid direct overlooking into existing bedroom windows in separate dwellings.
- Painted in a light reflective colour.
- To meet the minimum width and area dimensions for light wells specified in Table 4.

| Table 4 – Light well dimensions       |               |              |
|---------------------------------------|---------------|--------------|
| Building height                       | Minimum width | Minimum area |
| Up to 4 storeys<br>(12 meters)        | 2 meters      | 9 sqm        |
| 5-8 storeys<br>(up to 25 meters)      | 4.5 meters    | 29sqm        |
| 9 or more storeys<br>(over 25 meters) | 6 meters      | 51 sqm       |

### Decision guidelines – Light wells

- Applying the light well requirements specified in Table 1 from the first level of residential use. The light well minimum width and area dimensions may be varied for buildings containing multiple levels of non-residential uses.



Merri-bek  
City Council

# Activity Centres Program – Phase 1 Submission: Merri- bek Cluster

June 2025



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**Merri-bek City Council acknowledges the Wurundjeri Woi-wurrung people as the Traditional Custodians of the lands and waterways in the area now known as Merri-bek. We pay respect to their Elders past and present, as well as to all First Nations communities who significantly contribute to the life of the area.**

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## Introduction

As a key stakeholder, Merri-bek City Council (Council) welcomes the opportunity to provide feedback on Phase 1 of community engagement for the State Government's Activity Centres Program (Program).

At this early stage of the Program, Council has not received Activity Centre Plan(s) or any other supporting technical documentation for the Brunswick and Coburg Station Activity Centres (collectively known as the Merri-bek Cluster). This submission provides important high-level feedback based on available information and Council's close knowledge of the local community.

## Merri-bek City Council submission

Council is supportive of the State Government's objective to focus housing growth in well-serviced areas such as the Merri-bek Cluster. Council's existing total housing capacity across these suburbs is 25,859 (39% of Merri-bek's capacity), which can accommodate more than 34,000 people by 2051. This growth must be carefully planned to ensure delivery of affordable, sustainable, and diverse high-quality housing supported by essential infrastructure, transport, and open space.

Council has several material concerns with the current approach and asks the Minister for Planning to address these to ensure the accelerated Program does not compromise the liveability of Brunswick and Coburg. It is critical that the Program enables the long-term success of these Activity Centres. Seven key issues are raised below: transport, economy, infrastructure, climate, affordable housing, design quality, and genuine community engagement.

### 1. Transport

An integrated, accessible and efficient transport system is essential to supporting housing growth and creating liveable communities. However, Merri-bek's transport network, in particular public transport, is not keeping pace with population growth and evolving travel needs.

Significant increases in housing density without corresponding transport and public transport investment will see liveability standards drop significantly in both Brunswick and Coburg. Brunswick in particular has experienced significant housing development in recent years, but investment in public transport has fallen behind. The Upfield Line is already under significant pressure, and local roads are congested, with many streets operating at or near capacity. By focusing narrowly on housing delivery without corresponding investment in transport infrastructure and services, the State Government's Activity Centre program is at risk of significantly exacerbating these issues. Challenges include:

- The bus network is slow, infrequent, and lacks adequate coverage.
- Tram stops remain largely inaccessible, and trams are frequently delayed in mixed traffic.
- The Upfield rail line, essential to Melbourne's northern growth, has limited capacity and infrequent peak-hour trains.

- Walking and cycling infrastructure also requires improvement. Uneven footpaths, missing links, and steep ramps reduce safety and accessibility.

Council has significant initiatives in train to address local transport priorities, through the *Moving Around Merri-bek Transport Strategy (2024)* and the “Streets for People” approach which is currently undergoing community consultation. These seek to deliver better local transport and streets as shared, multi-modal spaces that support walking, cycling, and public transport use.

At the State level, *Victoria’s Bus Plan (2021)* sets out a vision for a modern, productive and sustainable bus network, with simpler, safer and more reliable services. The Plan was to be delivered through a staged Bus Reform Implementation Plan, developed in partnership with industry and the community. However, implementation has not progressed as scheduled.

## Key asks

To absorb any more housing along this corridor, it is essential that the State Government upgrade critical public transport links and fast track:

- Duplicating the Upfield line between Gowrie and Upfield.
- Extending the Upfield line to Craigieburn to enable Wallan V/Line services.
- Electrifying the Craigieburn–Wallan line to expand capacity and reduce travel times.
- Deliver a revitalised bus network that better connects people to jobs, education, and services, including preparing and implementing the Bus Reform Implementation Plan as outlined in *Victoria’s Bus Plan (2021)*.
- Upgrading tram stops and public transport infrastructure to meet overdue 2022 accessibility targets.

It is also vital that the State Government’s Activity Centre Plan for the Merri-bek Cluster:

- Address walking and cycling infrastructure by identifying missing links, unsafe paths, and connectivity gaps.
- Increase and improve bike parking requirements alongside any reduction to car parking requirements.

## 2. Economic growth and employment

Brunswick and Coburg are thriving hubs of creativity, innovation, and economic diversity. Brunswick, in particular, is known for its vibrant arts and culture scene, anchored by the Brunswick Design District and recently enhanced through Council’s \$28 million investment in the Balam Balam Place arts hub. RMIT’s design hub adds further strength to the precinct, while a growing cluster of technology and innovation businesses is shaping Brunswick’s future as a key centre for creative industries and knowledge-based jobs.

In Coburg, a mix of retail, professional services, and the city’s iconic jewellery and wedding precinct contributes to a strong and distinctive local economy. Together, these centres reflect Merri-bek’s diverse economic fabric and cultural identity. Ongoing strategic planning is essential to support and expand these dynamic economies—creating more local jobs and promoting inclusive, future-ready economic growth.

Employment in Merri-bek grew from 44,261 jobs in 2021 to an estimated 52,735 in 2023–24, driven largely by population growth and demand for services like health, education, retail, and hospitality. To

support continued growth, Merri-bek will require 87,000 to 241,000 square metres of additional employment floorspace by 2035.

However, Council's 2021 report *A Job in Moreland* identified that commercial floorspace is being lost through redevelopment, and market delivery remains inconsistent. There is a critical need to retain the role and function of employment land and precincts, and to support the delivery of diverse commercial spaces that meet the needs of a changing economy, particularly in activity centres such as Brunswick and Coburg Station.

To address this, Council consulted with the community on a Planning Scheme amendment to secure commercial floorspace and support Brunswick's role as a key hub for jobs, services, and housing. Unfortunately, Amendment C230mbek has been awaiting a decision from the Minister for over a year.

### Key asks

- Authorise Amendment C230mbek, which aims to encourage business investment and jobs in the commercial and industrial areas of the Brunswick Activity Centre to ensure the vibrancy of the area does not decline.
- Ensure that the Activity Centres Plan(s) include an evidence-based and economically viable plan to grow jobs and employment floorspace and ensure no net loss of employment floorspace in the Merri-bek Cluster.

### 3. Infrastructure

Population growth and development creates increased demand on essential infrastructure such as roads, footpaths, stormwater drains, public open spaces, schools, and community facilities. In high-growth areas like the Brunswick and Coburg Station Activity Centres, this demand is particularly acute and requires timely, coordinated infrastructure delivery.

Responsibility for delivering this infrastructure is shared between developers and all levels of government, including both Local and State Governments. Council is proactively planning for growth and addressing infrastructure needs through a coordinated framework of four proposed amendments to the Merri-bek Planning Scheme. All but one of these amendments are currently awaiting a decision from the Minister for Planning:

- Applying the new flood controls to properties at risk of flooding from local stormwater drains (Amendment C196mbek).
- Updating local planning policy to align with Council's transport and open space strategies (Amendment C231mbek).
- An increased open space contribution rate to ensure the provision of new public open space in response to growing demand (Amendment C235mbek).
- A new 15-year Development Contributions Plan to fund key infrastructure (Amendment C236mbek).

Delays in progressing these amendments limit Council's ability to plan, fund, and deliver critical infrastructure in response to ongoing population growth and development pressures.

To ensure the Merri-bek Cluster grows sustainably and remains liveable, the State Government must also commit to funding and delivering critical State infrastructure, including:

- Arterial roads, paths, and public transport.
- New and upgraded public schools.
- Enhanced health and community facilities.
- Parks, playgrounds, and sport and recreation spaces.
- Coordinated investment in broader regional infrastructure.

A clear, streamlined, and collaborative approach across all levels of government is essential to unlock local infrastructure contributions and ensure the timely delivery of state infrastructure that supports vibrant, resilient communities.

## Key asks

- Progress reforms to infrastructure contributions planning mechanisms—including the Activity Centre Infrastructure Contributions Plan—as a priority, to improve fairness, simplicity, and timeliness.
- Ensure delivery of committed upgrades to public schools, including Coburg High and John Fawcner College, where State-funded works have yet to be completed.
- Introduce legislative reform to ensure build-to-rent developments contribute fairly to the provision of public open space.
- Make timely decisions on the three Merri-bek Planning Scheme Amendments currently with the Minister (C231, C235, and C236mbek) to secure essential infrastructure funding for the growing Merri-bek Cluster.

## 4. Climate adaption and resilience

Merri-bek's activity centres are already experiencing the effects of climate change. Areas such as the Merri-bek Cluster can be up to 8°C hotter than surrounding suburbs due to low tree canopy cover and high urban density. Several streets within these centres are also vulnerable to overland flooding, with stormwater systems under increasing pressure. Rainfall intensity during short-duration events is projected to rise by over 30% by 2050, amplifying flood risks.

The Activity Centres Program must consider these climate impacts when planning for the Merri-bek Cluster. Intensifying housing in areas already exposed to extreme heat and flooding poses serious risks to community health, safety, and wellbeing. Future growth must be directed to locations that can support climate-resilient and liveable communities.

### Environmentally sustainable development

The Merri-bek community has a long-standing commitment to advancing best-practice Environmentally Sustainable Development (ESD). In July 2022, Merri-bek and 23 other councils submitted a group amendment (Amendment C223mbek) to the State Government seeking to elevate sustainability standards in new development. The amendment is still under consideration.

Progress on Amendment C223mbek is increasingly important, as recent changes to state-wide residential design standards may reduce the sustainability outcomes achieved by many councils. Under the new State requirements, average ESD performance in townhouse and apartment developments will materially decline. This will negatively impact both the climate and the liveability standards of future dwellings.

## Flooding

Effective water and flood management is essential to sustainable urban growth. Several areas within the Merri-bek Cluster are flood-prone. Council is progressing Amendment C196mbek to apply flood controls to properties at risk of inundation from local stormwater drains. While these controls focus on raising floor levels, they do not guarantee well-designed, flood-resilient buildings. Additional planning guidance is needed to support appropriate building heights, active ground-floor uses, and smooth transitions between raised floors, footpaths, and overall building form.

At the precinct scale, Integrated Water Management (IWM) strategies (such as permeable surfaces, floodable open space, and distributed detention) will be essential for managing more intense rainfall, reducing flood risk, and improving amenity, cooling, and liveability.

## Key asks

- Ensure that the Activity Centre Plan(s) and associated planning controls:
  - Provide strong, consistent ESD and climate response requirements, informed by a Climate Response Plan for the Merri-bek Cluster.
  - Guide building height in areas subject to inundation.
  - Resolve transitional issues between raised floor levels, footpaths, and final building heights.
  - Embed precinct-scale Integrated Water Management (IWM) strategies into the Program.
- Work with Council Alliance for a Sustainable Built Environment (CASBE) to embed best-practice ESD into the entire State government Activity Centre program.
- Work with the Metropolitan Melbourne Integrated Water Management (IWM) Forum and the Department of Energy, Environment and Climate Action (DEECA) to embed best-practice IWM Design Guidelines into the Program.
- Authorise Amendment C223mbek to Merri-bek Planning Scheme.

## 5. Affordable and diverse housing

While there is a need to increase housing supply, it is equally important that new development delivers an affordable, diverse and accessible range of housing options to meet the evolving needs of our community. Merri-bek has a long-standing commitment to the delivery of diverse housing including social and affordable housing.

### Housing diversity and accessibility

As people's lives change, so do their housing needs. Diverse and accessible housing is essential to creating inclusive, resilient communities. A mix of apartments, townhouses, and detached homes—offered in various sizes, layouts, and tenures—provides choice for people of all ages, incomes, and household types.

Accessible design ensures homes meet the needs of older adults, people with disabilities, and those with temporary mobility challenges. Embedding universal design principles helps ensure housing remains functional and inclusive at every stage of life.

## **Affordable housing**

Merri-bek is experiencing a significant and growing shortfall in affordable housing. As housing costs rise, more households are unable to secure affordable rentals. Current 4,341 households (6.4% of Merri-bek's population) are unable to access affordable market-priced housing. On current growth and housing supply settings, the number of households in need of subsidised/below-market housing in Merri-bek is predicted to reach 6,800 by 2041. Nearly three-quarters of current jobs in Merri-bek are done by key workers; nearly 4,000 Merri-bek key workers have relocated outside the municipality over the past five years, as a result of housing unaffordability.

Delivery of affordable housing in Victoria is constrained by its reliance on voluntary agreements. This creates uncertainty and places a continuing resource burden on councils, developers, and landowners.

### **Key asks**

Council has long advocated for the State government to introduce mandatory inclusionary zoning to secure affordable housing supply, increase State investment in social housing, and support new affordable housing models through funding, partnerships, and use of public land.

However, in relation to the Activity Centre work in Brunswick and Coburg, Council asks that the Activity Centre Plan(s) and associated planning controls:

- Include affordable housing requirements.
- Encourage the integration of universal design to promote flexible, lifelong housing.
- Support the delivery of larger dwellings in apartment developments, suitable for families and shared households.
- Encourage a diversity in apartment types to meet a range of lifestyle and household needs.

## **6. Design quality**

Council supports increased housing in the Merri-bek Cluster but emphasises the need for strong built form planning controls to ensure high-quality, well-integrated outcomes, especially on smaller or irregular sites.

Without clear guidance, there is a risk of developments with poor street engagement, limited natural light, and low-quality finishes. Robust design standards can help deliver liveable, attractive, and contextually appropriate buildings.

Council also supports balancing growth with heritage protection, ensuring new development complements the existing streetscape.

### **Key asks**

To provide good development outcomes, the Activity Centre Plan(s) and associated planning controls must:

- Respond to site conditions including topography, orientation and context.
- Minimise the dominance of vehicle access and parking and prioritise usable private open space at ground level.

- Require high-quality materials and finishes.
- Align with Heritage Overlay objectives to ensure new development respects the location, bulk, form, and appearance of heritage places.

## **7. Community and Council engagement**

The Activity Centres Program will bring significant change and must be guided by clear, inclusive, and ongoing local engagement. A critical component of this is ensuring the notification boundary is broad, logical, and captures all areas directly or indirectly affected by the Program. This includes locations such as eastern Coburg between Bell Street and Moreland Road, which was excluded from the initial engagement without clear justification.

Council expects that the engagement process will provide accessible information, genuine opportunities for input, timely communication, and transparent decision-making that respects local knowledge and builds community trust. These are the same principles Merri-bek applies when undertaking changes to the Planning Scheme, and the community should be afforded the same standard by the State.

### **Key asks**

- Release all technical information to support transparency, context, and informed participation.
- Expand the notification boundary to include all affected areas, including the section of eastern Coburg between Bell Street and Moreland Road.
- Provide timely, accessible materials in plain English and translated formats. This includes the Activity Centre Plan(s) and the draft planning controls.
- Commit to meaningful community participation. This includes offering more community engagement touchpoints, allowing more time for community and Council to digest proposed changes and prepare submissions, and committing to listen and respond to feedback.
- Refer submissions to an independent Advisory Committee with public hearings, broad terms of reference, with the Minister for Planning publicly explaining any deviations from its recommendations.

## **Conclusion**

Merri-bek City Council supports well-planned growth in activity centres that reflects local priorities and delivers lasting community benefit. Council looks forward to working with the State Government to achieve these outcomes.