

**Banyule Council Submission to the  
Activity Centre Program for Phase 2:  
Sharing Draft Maps for Heidelberg - 13  
October 2025**

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# Introduction

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This is an endorsed submission from Banyule City Council (Council) to the current engagement being conducted by the State Government's Activity Centre Program (ACP) for Heidelberg, entitled "Phase 2: Sharing Draft Maps". The submission was endorsed by Council at the Ordinary Council Meeting (see Item 6.1) on 13 October 2025.

To preface the key comments in this submission, Council notes that, through the engagement, the ACP has particularly exhibited mapping in and around the Heidelberg Activity Centre that proposes:

- The extent of the core of the centre with maximum building height limits.
- The extent of inner and outer catchments, each with maximum building height limits.

Council also understands that:

- The draft maps propose to apply to the core the suite of building height limits contained within Council's adopted Heidelberg Structure Plan (February 2025).
- The maximum building height limits applied for the inner catchment are those set by the Schedule 1 to the Housing Choice and Transport Zone (HCTZ1) and those applied for the outer catchment are set by the HCTZ2.

In relation to Council's feedback, a key positive for Council is the proposal to adopt the suite of building height limits in the core that are recommended by the Heidelberg Structure Plan (February 2025) and Council's adopted Amendment C172 to the Banyule Planning Scheme.

While the Minister's decision on Amendment C172 is still pending, it is reassuring to see that the extensive work undertaken by Council and the community has been acknowledged and incorporated.

Council identifies some other positives in the proposed application of the catchment areas. These are:

- The application of the proposed inner catchment, which might allow significantly more development than currently exists in residential areas, is modest, contained and is not in particularly prominent locations in the local landscape.
- Application of the outer catchment has not been extended to some very sensitive residential areas south of The Eyrie and between Rosanna Road and The Boulevard, where there are significant heritage precincts.

Council welcomes these positives.

However, there are several issues identified in Council's submission, including:

- Certain inclusions within the catchment, including one area of the inner catchment, are particularly subject to the risk of flooding and may not be suitable for the proposed development settings.
- There are further areas that should not be included in the outer catchment due to particular values and sensitivities, such as heritage value or environmental value.
- The proposed western and north-western portion of outer catchment overlaps the Postcode 3081 – Urban Design Framework (UDF). This overlap is inappropriate, particularly because it will undermine the UDF's tailored approach to increase housing in suitable locations.
- The proposed outer catchment extends in parts to beyond 800 metres walking distance from the commercial core and railway station of the Heidelberg Activity Centre, which contradicts the generally accepted sound planning principle that an activity centre's residential catchment should be limited to 800 metres (10 minutes) walking distance from the centre's shops and services, as this is the maximum distance people will typically walk to access these destinations.

In response to these issues, Council's submission requests changes to the proposed mapping which it considers are highly appropriate and practical for the ACP to implement.

Finally, through this submission, Council strongly expresses its frustration with the lack of proper engagement undertaken by the ACP with Council and the community in developing its framework for the Heidelberg Activity Centre. While acknowledging the community engagement undertaken—which has largely replicated Council’s previous efforts through the structure planning process—as a key stakeholder, it would have been reasonable to expect that the technical expertise of Council officers be given greater consideration.

## The proposed mapping of the core

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Council’s proposed application of Schedule 2 to the Activity Centre Zone (ACZ2) was carefully developed and then reviewed by both the community through extensive consultation for Amendment C172 and by an independent planning panel that considered the amendment. Changes were made to the ACZ2, particularly regarding maximum building height limits, in response to the findings of this process of engagement and review.

It is very pleasing, therefore, to see that the ACP’s draft mapping:

- Matches Council’s adopted position regarding the mapping of the core, as reflected in Council’s Heidelberg Structure Plan (February 2025) and Amendment C172.
- Applies the suite of maximum building height limits to the core proposed by the Heidelberg Structure Plan (February 2025) and Amendment C172.

While the Minister’s decision on Amendment C172 is still pending, it is reassuring to see that the extensive work undertaken by Council and the community has been acknowledged and incorporated.

Council notes that the reference to the “Heidelberg Structure Plan” in the exhibited mapping of the core does not explicitly state this is a reference to that version of the document that was adopted by Council in February 2025. However, ACP officers have confirmed for Council officers that the reference is indeed to the Heidelberg Structure Plan (February 2025). It is important that any future version of the ACP’s map for the core clearly spells out this reference for the purpose of clarity.

**Council request: The ACP clearly documents on future engagement material and final documents that the core is subject to the maximum building height limits set by the Heidelberg Structure Plan (February 2025).**

## Proposed mapping of the catchment areas

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### Extent of Inner v Outer Catchments

The potential that the ACP would propose extensive application of the inner catchment to residential areas, where Council’s structure plan and amendment propose to extensively retain a 3-storey height limit, has been a concern for Council. This is particularly because such application of the HCTZ1 could significantly increase maximum building height limits on large sites, and over a wide area, from 3 storeys to 6 storeys, which would likely have a significant detrimental impact on neighbourhood character, landscape views and heritage sites.

However, Council recognises and appreciates that the proposed application of the inner catchment is quite contained to two modest sized areas, one north of Darebin Street and one south of Banksia Street. Further, both sections of inner catchment, in the context of Heidelberg’s very hilly terrain, are in somewhat lower

sections of the landscape where the visual impact of 6-storey buildings may not be so prominent in the landscape.

Council also recognises and appreciates that the proposed application of the outer catchment avoids certain significant heritage precincts in vicinity of the Heidelberg Activity Centre, including:

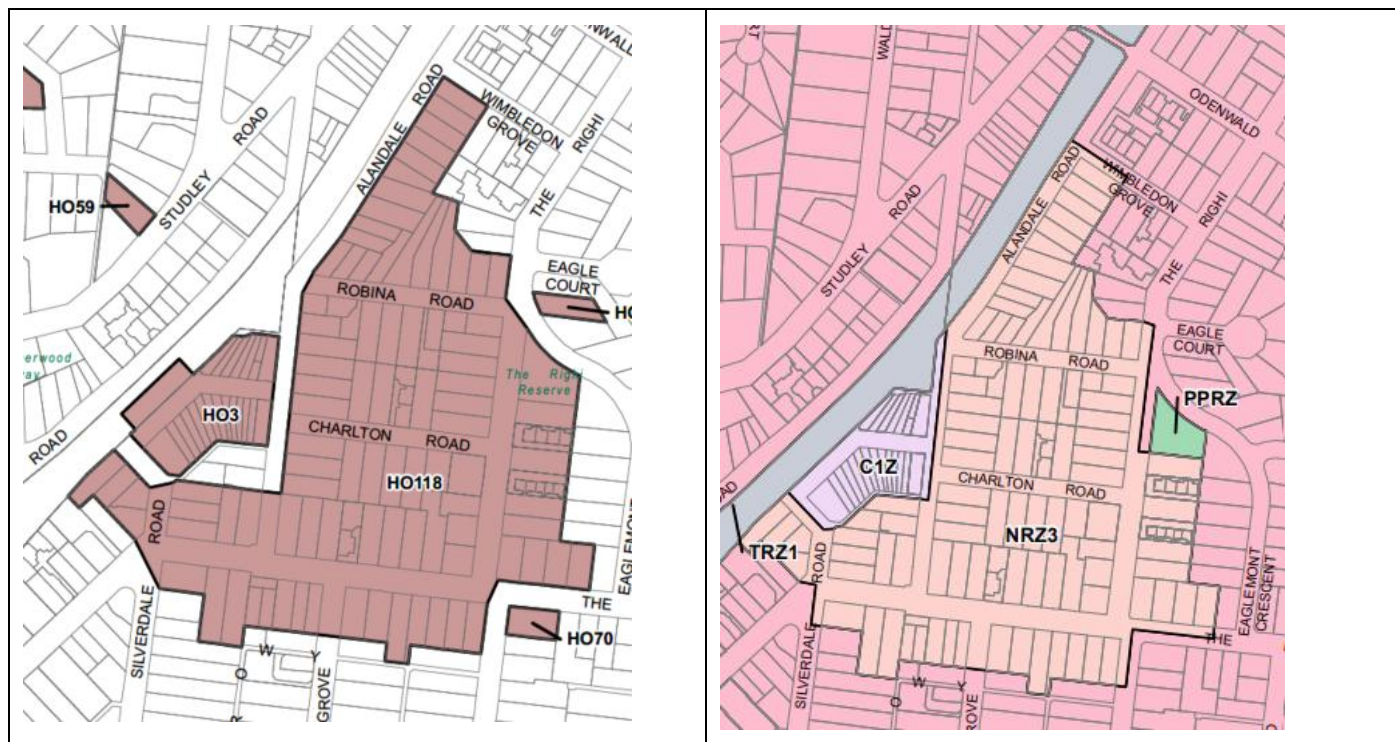
- The Walter Burley Griffin's Glenard Estate (HO1) and the Glenard Estate (HO126) located between Lower Heidelberg Road and The Boulevard.
- The Walter Burley Griffin's Mount Eagle Estate (HO2) and Mount Eagle Estate (HO127) on the south side of The Eyrie.

The particular values of these areas are not only recognised and protected by application of the HO, but also that they are placed within the Neighbourhood Residential Zone: Schedule 3 (NRZ3), which sets a maximum building height limit of 2-storeys. It appears that the ACP has quite rightly recognised that application of the HCTZ2 to these areas would create an unacceptable conflict with the focus of the existing planning settings being to protect the special values of these areas.

Whilst Council recognises and appreciates the above aspects of the proposed mapping of the core and catchment areas, Council does have some issues with separate aspects of the proposed mapping of the catchment areas, which will now be explained.

## Inclusion of the Ivanhoe Views Estate (HO118) in the outer catchment area

The Ivanhoe Views Estate is a large heritage precinct in Eaglemont that is recognised and protected by the HO118. Further, the important neighbourhood character values associated with this heritage precinct are further recognised and protected by application of the NRZ3 to the precinct. The application of the HO118 and NRZ3 are shown in the following maps:



**Figure 1: Application of the HO118 (Ivanhoe Views Estate) and application of the NRZ3 to the same land**

The planning scheme essentially applies the same settings to the Ivanhoe Views Estate that it does the two Walter Burley Griffin estates, mentioned above. This reflects that the Ivanhoe Views Estate is no less worthy of protection than the Walter Burley Griffin estates.

However, whereas the Walter Burley Griffin estates have been excluded from the proposed catchment area, the ACP's proposed mapping places most of the Ivanhoe Views Estate into the outer catchment, where the HCTZ2 will be applied. This is not supported by Council, as application of the HCTZ2 will set pressures for development that will not support protecting the intrinsic values of this precinct.

On this point, application of the HCTZ2 will set a maximum building height limit of 4-storeys on large sites, which is a limit substantially greater than the 2-storey height limit currently set by the NRZ3. Even if many sites within the estate do not currently satisfy the HCTZ2's definition of large, this situation could be undermined by consolidation, particularly as many sites are already relatively close to 1000 square metres in size. In short, application of the HCTZ2 will likely significantly stimulate long-term development pressures that are not in keeping with protecting this heritage precinct.

The planning situation created by the proposed application of the HCTZ2 is further confusing because part of the estate, land south of The Eyrrie, will not be included within the outer catchment. This means that different parts of the estate will be subject to quite different planning scheme zones and general planning settings.

As the Ivanhoe Views Estate is located on one periphery of the proposed application of the outer catchment, it would be an appropriate and relatively easy adjustment for the ACP to exclude this estate from the catchment. It would not create a complicated patchwork or spot zoning outcome.

**Council request: All land in HO118 (Ivanhoe Views Estate) be excluded from the proposed outer catchment and instead, be retained within the NRZ3.**

## Inclusion of significant and sensitive land bordered by Devon Street, The Eyrrie, Mount Street and Lower Heidelberg Road, Eaglemont

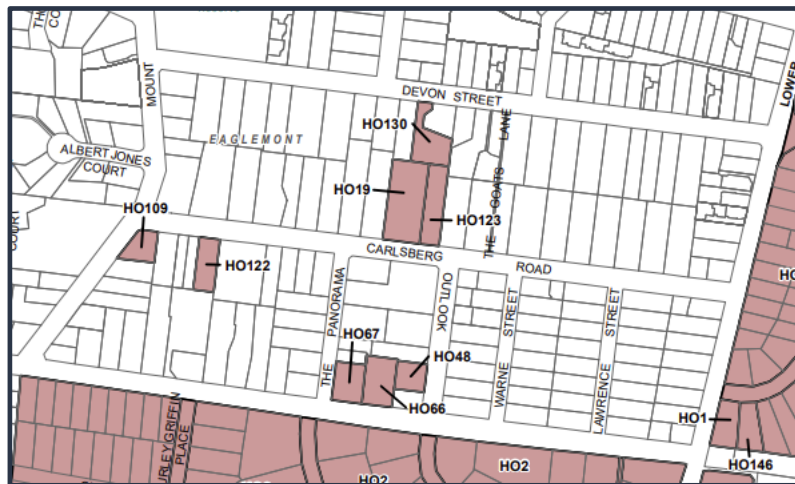
The proposed outer catchment extends over another patch of particularly sensitive land in Eaglemont, which is land within the area bordered by Devon Street, The Eyrrie, Mount Street and Lower Heidelberg Road. The significance and sensitivity of different parts of this land is acknowledged in different ways by the Banyule Planning Scheme. In particular, Schedule 4 to the Environmental Significance Overlay (ESO4) is widely applied in the area, particularly on land abutting Carlsberg Road, as shown in the following map:



**Figure 2: Application of the ESO4 in and around land bordered by Devon Street, The Eyrrie, Mount Street and Lower Heidelberg Road**

The purpose of the ESO4 is to protect significant trees and vegetation and importantly, in this area, vegetation is not limited to street trees.

Further, there is significant application of the HO in the subject area, including HO19, HO48, HO66, HO67, HO109, HO122, HO123 and HO130, which is shown in the following map:



**Figure 3: Application of the HO in and around land bordered by Devon Street, The Eyrrie, Mount Street and Lower Heidelberg Road**

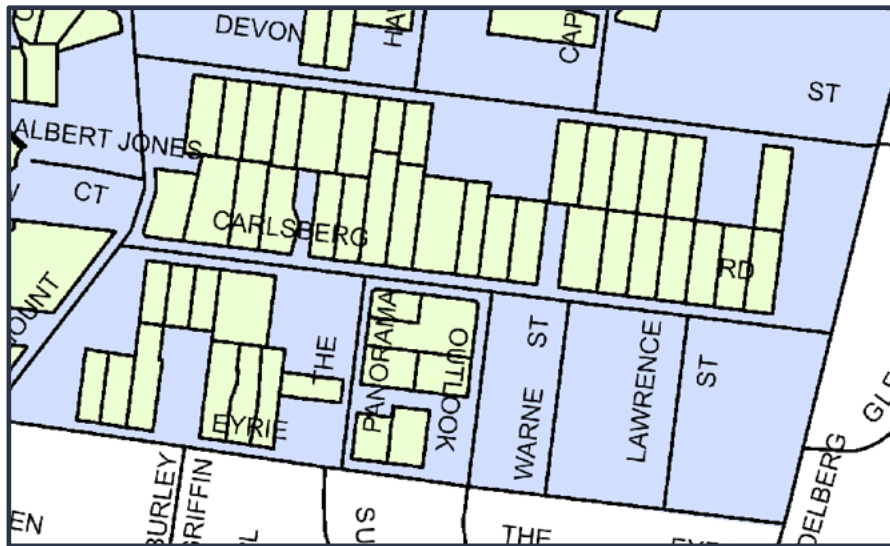
In addition, there is significant application of the NRZ3 within the area, as identified by the red box in the following image:



**Figure 4: NRZ3 land north of The Eyrrie proposed for inclusion in the outer catchment**

This application of the NRZ3 particularly reflects neighbourhood character values and the need to protect these.

The ACP proposes to place this land bordered by Devon Street, The Eyrrie, Mount Street and Lower Heidelberg Road into the outer catchment. However, Council contends that this is not appropriate, as its inclusion will excessively conflict with protecting the values of the area documented above. Adding to this concern is that Council's preliminary research has identified that a large number of sites within the area will likely satisfy the definition of "large site" as defined by the HTCZ\*. The following image shows, in green, sites in the area that are considered to likely satisfy that definition:



**Figure 5: Sites in and around land bordered by Devon Street, The Eyrie, Mount Street and Lower Heidelberg Road considered likely to satisfy the definition of large for the purpose of the HCTZ.**

If these sites satisfy the definition of “large”, this means that a 4-storey height limit would apply to much of the area, which would not be consistent with protecting the area’s heritage, neighbourhood and heritage values. As this area is on the periphery of the catchment, it would be a simple and clean mapping exercise to exclude it from that catchment. Council recommends it appropriate that the ACP exclude this area to provide proper protection of its particular sensitivities and significance.

**Council request: Remove land within the area bordered by Devon Street, The Eyrie, Mount Street and Lower Heidelberg Rd from the proposed outer catchment.**

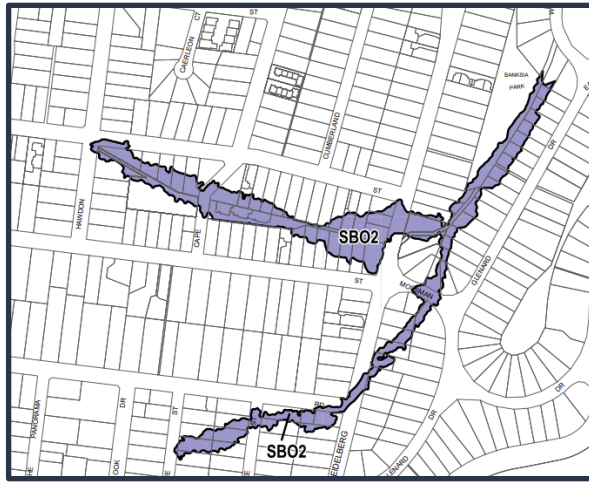
\*NB: Council’s estimates in this submission as to what sites likely meet the HCTZ’s definition of “large” are not conclusive, as this would require confirmation (e.g. from a recent copy of title) of land area and length of frontage.

## Responding to the risk of flooding

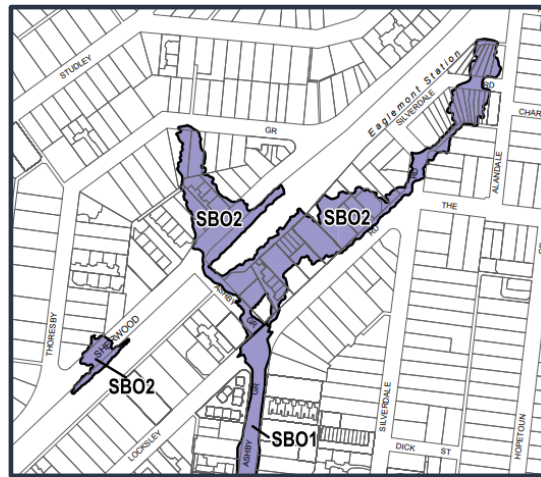
A number of the areas which the ACP mapping proposes to include within the catchments are particularly subject to flooding. Key examples are the following:

- Part of the outer catchment at Durham and Devon Streets, Eaglemont, which is subject to Schedule 2 to the Special Building Overlay (SBO2).
- In vicinity of Locksley Road, Eaglemont where the SBO2 applies.
- Part of the northern inner catchment (north of Darebin Street), which is subject to the Land Subject to Inundation Overlay (LSIO).

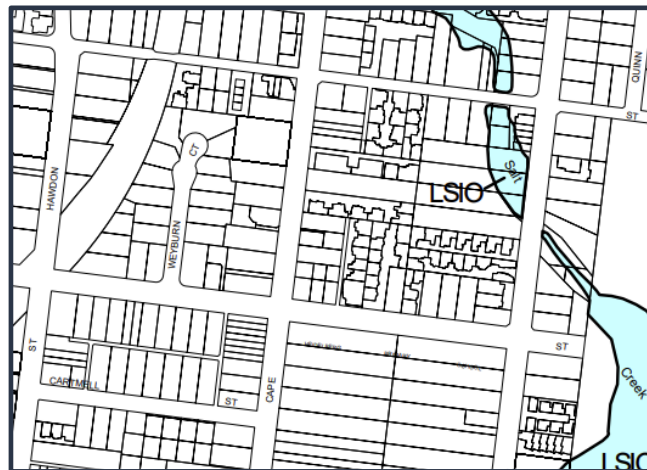
These examples are shown in the following maps:



**Figure 6: Application of SBO2 in vicinity of Durham, Devon and Carlsberg Streets, Eaglemont**



**Figure 7: Application of the SBO2 in vicinity of Locksley Road, Eaglemont**



**Figure 8: Application of the LSIO in vicinity of Darebin and Brown Streets, Heidelberg.**

The applications of the SBO2 reflect land that has a significant potential flood depth, which can result in significant restrictions regarding flooding being applied to any development proposal. For example, restrictions requiring a minimum height for safe egress, not just a minimum building floor height.\*\* To apply the HCTZ to land within these applications of the SBO2 may set unreasonable expectations regarding the ability of the land in question to support a higher density of housing. For example, contrary to expectations set by the HCTZ, it may be that flooding restrictions do not allow much if any additional density of dwellings, or do not allow any basement car parking.

The situation may be similar regarding the LSIO (see Figure 8) over part of the proposed inner catchment north of Darebin Street. The application of the LSIO is to Salt Creek, which is a local waterway that has a history of flooding and causing damage. As the HCTZ1 sets higher development expectations, if the zone is applied, any issues with flooding of that creek are likely to be more significant and long-term for future development.

A further aspect of this matter that the ACP should consider is that a considerable review of flood modelling is currently being conducted by both Council and Melbourne Water in light of recent severe flooding in Melbourne, additional community and governmental concerns regarding this issue and the effects of climate change. The final extent of flood mapping from this review process is still not known, but is expected to result in flooding provisions being more widely applied. This needs to be considered by the ACP in considering its application of the catchment areas. Council strongly suggests that the ACP, if it hasn't already done so, discusses this matter with relevant authorities, particularly Melbourne Water, to ensure its catchment areas and development settings properly align with the most recent modelling as to the risk of flooding.

In addition, Council notes that the existing and potential expanded application of the SBO2 in vicinity of Devon and Carlsberg Streets (shown in Figure 6 above) adds support for Council's request on page 7 that land within the area bordered by Devon Street, The Eyrie, Mount Street and Lower Heidelberg Rd be excluded from the proposed outer catchment.

**\*\*Relevant to safety criteria as set out in the Guidelines for Development in Flood Affected Areas (Feb 2019)**

**Council request:**

**It is critical that the ACP consider the views and latest modelling of relevant flooding authorities, such as Melbourne Water, in determining its catchment areas and modifies the mapping of the catchments accordingly.**

**(NB: The ACP's engagement maps on Engage Victoria wrongly refer to Salt Creek as the Yarra River.)**

## **Conflict with the Postcode 3081 Urban Design Framework**

Amendment C120 to the Banyule Planning Scheme was approved on 15 October 2020 and introduced the Postcode 3081 Urban Design Framework (UDF) to particular land in the suburbs of Bellfield, Heidelberg Heights, and Heidelberg West. This extent of the UDF is defined at Clause 15.01-5L-02 of the Banyule Planning Scheme and it generally stretches from west of the core of the Heidelberg Activity Centre north to Dougharty Street, in proximity of La Trobe University.

Plan Melbourne 2017-2050 identified Heidelberg West as part of the Latrobe National Employment and Innovation Cluster, where housing renewal and improved diversity is needed to support expanded job opportunities and employment growth. To support the objectives of Plan Melbourne, Council prepared the Postcode 3081 UDF to help guide urban renewal and the appropriate built form and landscape outcomes for housing change.

An important feature of the Postcode 3081 UDF, as implemented by Amendment C120, is that it provides a carefully tailored patchwork of GRZ1 and Schedules 5, 6, 7, 8 and 9 to the RGZ, where the GRZ1 supports modest residential growth in more sensitive areas and the RGZ schedules support higher densities of residential growth along key roads, recognising the better access to public transport in these corridors. Although the GRZ1 sets a maximum building height limit of 3 storeys, the applications of the zone still allow for considerable housing growth, particularly given the existing height of housing is typically one storey.

There is considerable overlap between the Postcode 3081 UDF, as currently applied by the Banyule Planning Scheme, and the ACP's proposed outer catchment to the west and north-west of the core of the Heidelberg Activity Centre. This overlap is shown by pink hatching in the following map:



# Conflict with Schedule 1 to the Residential Growth Zone

Schedule 1 (Heidelberg Major Activity Centre Residential Areas) to the Residential Growth Zone is applied to a residential area along the north side of Bell Street between Edwin Street and Waterdale Road. This land is part of the Heidelberg Activity Centre and not part of the Postcode 3081 UDF. Application of the RGZ1 is shown in the following image:



**Figure 10: Location of the RGZ1 on Bell Street**

The RGZ1 is applied in recognition of the proximity of this land to public transport and services and applies the parent provision's default maximum building height limit of 13.5 metres. Council's adopted Heidelberg Structure Plan (February 2025) and Banyule Amendment C172 propose to modify the zone to allow for and to guide greater capacity for housing development in the RGZ1. For example, the amended RGZ1 proposed by Amendment C172 proposes a set of objectives tailored for this purpose and to increase the maximum building height limit permitted by the RGZ1 to 16 metres (5 storeys).

The ACP's catchment mapping proposes to place the RGZ1 land into the outer catchment. If this occurs, a maximum building height limit of 11 metres or 3 storeys will apply (potentially 4 storeys on large sites), which will be more restrictive than the existing zone and even more restrictive than the 16 metres (5 storeys) height limit proposed by Council's Banyule C172. Such an outcome would be contrary to the intended purpose of the State Government's Activity Centre Program of increasing housing density in appropriate locations.

Council contends that the ACP should support the maximum building height limit proposed by Banyule C172. This could be handled in a number of ways. For example, by extending the core to include the RGZ1, noting the core will apply the building height limits proposed by Council's Heidelberg Structure Plan (February 2025). The additional maximum building height permitted by doing so, should be considered in support of Council's request to exclude particular areas from the proposed outer catchment.

## Council request:

- **The ACP's proposed mapping be modified to retain for RGZ1 land the maximum building height limit of 16 metres (5 storeys) proposed by the Heidelberg Structure Plan (February 2025) and Council's adopted Amendment C172; and**
- **The additional maximum height limit provided by doing so is considered in support of Council's requests in this submission to exclude particular areas from the exhibited outer catchment.**

## Additional conflict with environmental values

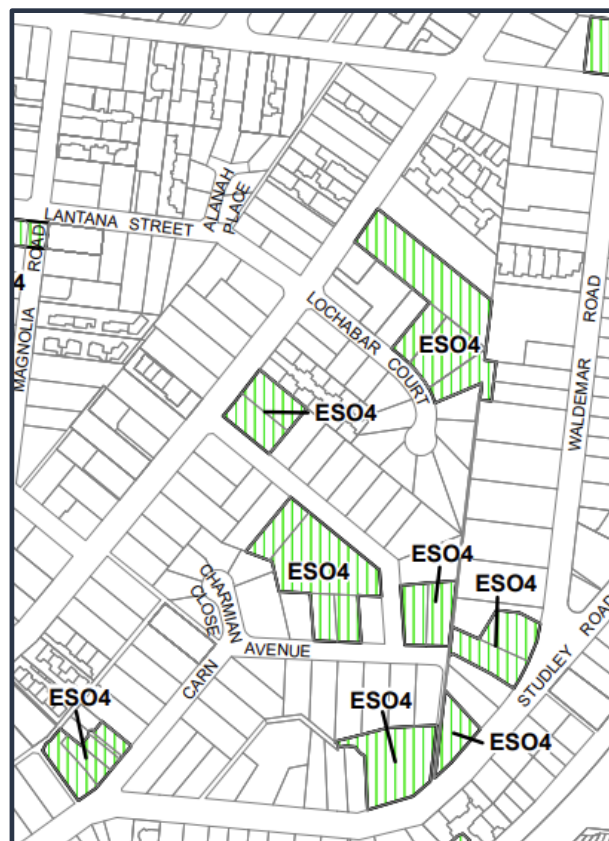
The development expectations and settings that would be applied by the HCTZ are not consistent with protecting environmental attributes identified by the Environmental Significance Overlay (ESO). However, Council does appreciate that:

- It could be impractical to exclude from the HCTZ small and isolated applications of the ESO that are well within the periphery of the HCTZ.
- If the vegetation is primarily street trees, then it is far less likely to be impacted by future development.

However, there are two significant concentrations of the ESO4 on the periphery of the proposed outer catchment where Council considers it both practical and justified to exclude land from the catchment.

The first of these is on both sides of Carlsberg Road and has been addressed as part of Council's request above that the proposed outer catchment be adjusted to not include the area of land in Eaglemont bordered by Devon Street, The Eyrie, Mount Street and Lower Heidelberg Road.

The second is a cluster of ESO4 in land in Eaglemont and Ivanhoe that is generally bordered by Waldemar Road, Studley Road and Upper Heidelberg Road. This cluster of ESO4 is shown in the following image:



**Figure 11: Applications of ESO4 in and around land bordered by Waldemar Road, Studley Road and Upper Heidelberg Road.**

Like the cluster of ESO4 at Carlsberg Road, this one includes sufficient significant vegetation on private land to raise the likelihood that the additional development expectations and capacity set by the HCTZ2 would pose unwarranted risk for this vegetation. Adding to this concern is that Council's preliminary research indicates there is a considerable overlap between application of the ESO4 and sites that are likely to satisfy the definition of "large" as defined by the HCTZ. This overlap can be seen by comparing Figure 11 (above) with Figure 12 below. The potential incidence of larger 4-storey development has the potential to increase the future impact on significant vegetation.



**Figure 12: Sites in and around the land bordered by Waldemar Road, Studley Road and Upper Heidelberg Road that are considered likely to satisfy the definition of “large” for the purpose of the HCTZ.**

The area is on the periphery of the proposed outer catchment and it would, therefore, be a simple mapping exercise to remove the subject area from the proposed outer catchment.

**Council request: That the land in Eaglemont and Ivanhoe that is generally bordered by Waldemar Road, Studley Road and Upper Heidelberg Road be removed from inclusion within the exhibited outer catchment area.**

## Applying a limit of 800 metres walking distance to the outer catchment area

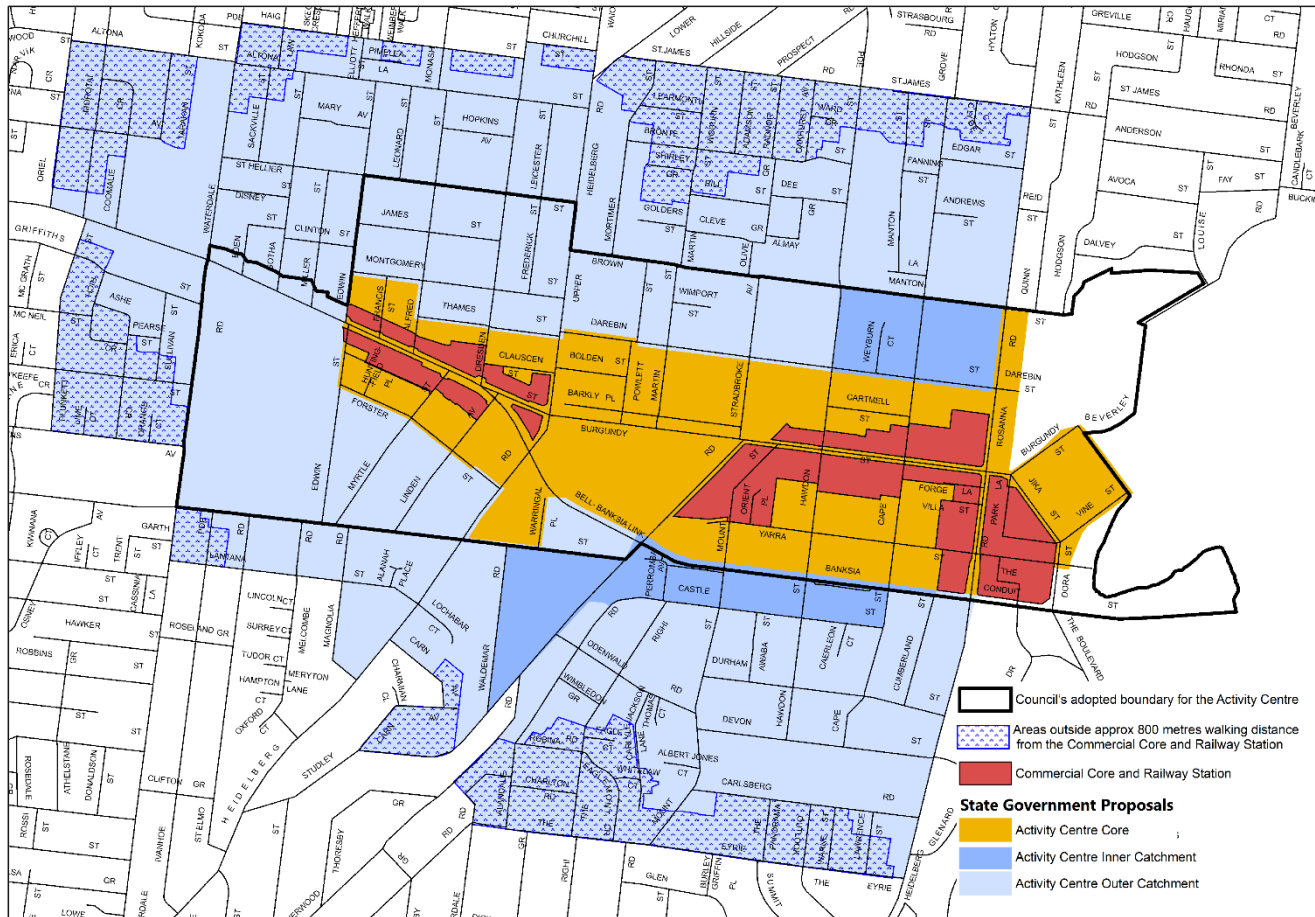
It has been an established principle of the State Government’s activity centre policy to limit consolidation of residential development to within a walkable catchment of the commercial/transport core of an activity centre. This is a sensible approach that recognises that beyond a certain distance to shops and services, residents will more likely drive to a centre than walk and that therefore, the best sustainability outcomes (e.g. greater increase in people walking to a centre) can be achieved by consolidating housing within that limit from the activity centre’s core, in unison with other measures to promote walkability to the centre and the quality of the centre as a destination.

Council has recently been involved in a State Government program that supported an 800 metre (10 minute) walking distance as a suitable limit to a walkable catchment from the commercial core of an activity centre. Council advocated to this program that the walking catchment should be defined by a true walking distance of 800 metres that reflects obstacles (e.g. the configuration of roads and a lack of crossing points on main roads and railways), rather than crudely apply an 800 metres “as the crow flies” limit from the core.

In relation to this matter, Council has two concerns regarding the ACP’s proposed mapping of the outer catchment. These are:

- The proposed mapping of the core includes within its periphery sizeable areas that are part of the centre’s residential catchment. These areas should not be considered as a point from which to define a walkable catchment from the commercial core or transport hub of the centre.
- Certain parts of the ACP’s proposed outer catchment appear to extend notably beyond 800 metres walking distance from the commercial core and transport hub for the activity centre.

These two points are demonstrated in the following map, which shows land that is beyond 800 metres (10 minutes) walking distance from the existing commercial core and railway station of the Heidelberg Activity Centre.



**Figure 13: Land outside 800 metres walking distance from the commercial core and/or railway station of the Heidelberg Activity Centre**

As can be seen from the map, significant areas of land within the southern, western and northern periphery of the outer catchment are beyond an 800 metre walking distance from the commercial core and/or railway station.

Due to the short-time frame provided by the ACP for Council to prepare its submission, walkability has been mapped only by desk-top research using a program that considers the distance required to use the existing road configuration to reach a destination. However, this approach is still a notable improvement on any use of “as a crow flies” approach, or measuring the catchment from residential land in the core.

However, if time permitted, the mapping could more accurately define a walkable catchment of 800 metres walking distance by factoring in topography, which is hilly and steep in much of the area, and considering a wider range of obstacles. Further, a relatively steady pace of walking is used in the modelling, which will not be the pace of all demographics. Considering these matters, the above mapping should be used as a conservative

or minimum estimate as to what parts of the outer catchment are greater than 800 metres walking distance from the commercial core and/or railway station.

Council contends that any part of the proposed outer catchment that is greater than 800 metres walking distance from the commercial core and/or railway station should be excluded from the outer catchment on the basis that it is too far walking distance from the activity centre's shops and services to achieve the sustainability goals that activity centre policy aims to obtain. Given the above map is a conservative guide as to an 800 metre walkability catchment, further research is required to properly define this boundary.

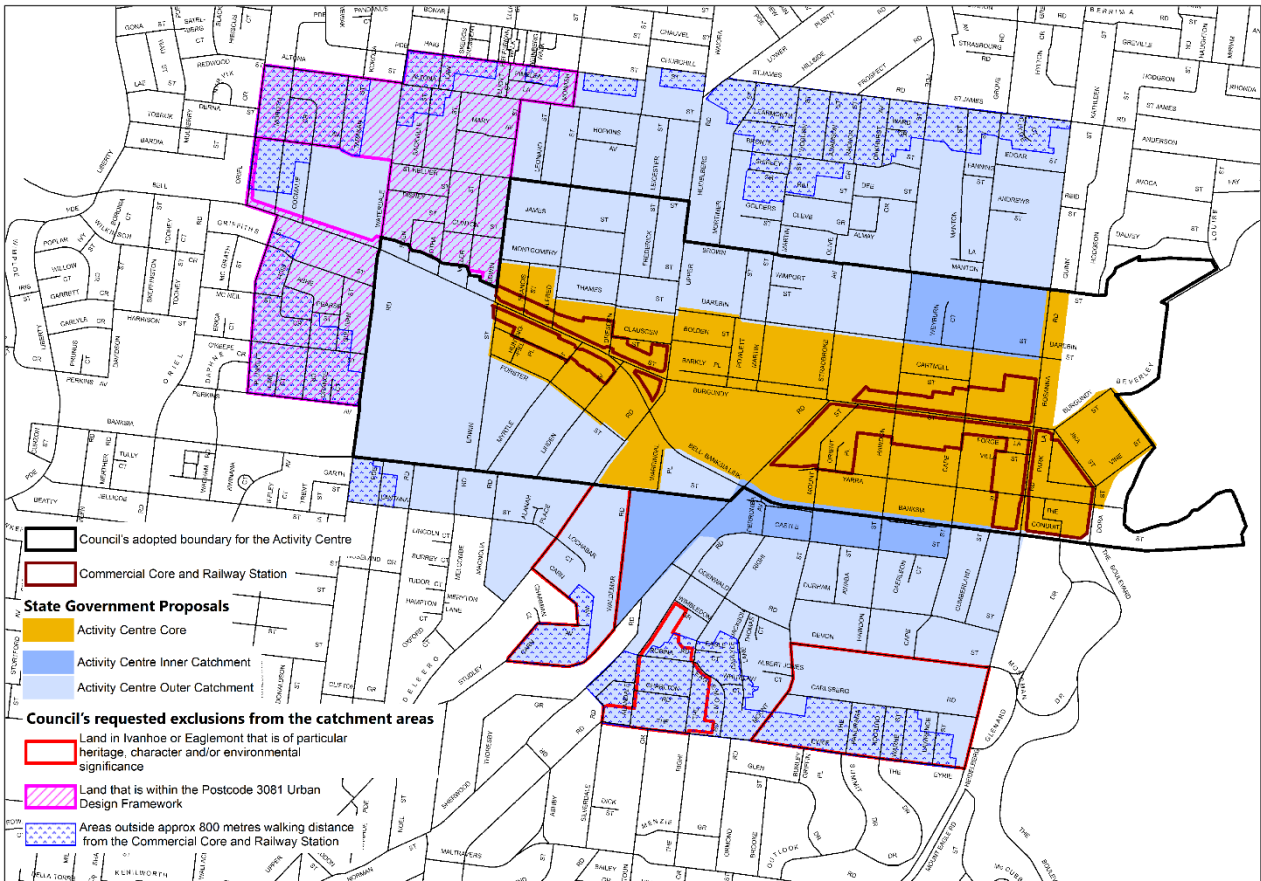
**Council's request: The ACP remove all areas from the proposed outer catchment that are greater than 800 metres walking distance, with the walking distance being based on the actual route pedestrians will use considering any obstacles, terrain and demographics and not "as the crow flies".**

## Summary of recommended exclusions and other changes to the proposed mapping

Across the issues discussed above, Council's submission has recommended a number of exclusions from the proposed catchment areas. These include:

- Land within the Ivanhoe Views Estate, as recognised by HO118 in the Banyule Planning Scheme.
- Land bordered by Devon Street, The Eyrie, Mount Street and Lower Heidelberg Road, Eaglemont
- Land within the Postcode 3081 Urban Design Framework, as defined at Clause 15.01-5L-02 of the Banyule Planning Scheme.
- Land that is greater than 800 metres walking distance from the commercial core and/or railway station of the Heidelberg Activity Centre, with the walking distance being based on the actual route pedestrians will use considering any obstacles, terrain and demographics and not "as the crow flies".

The following map shows each of these recommended exclusions by type from the catchment areas:



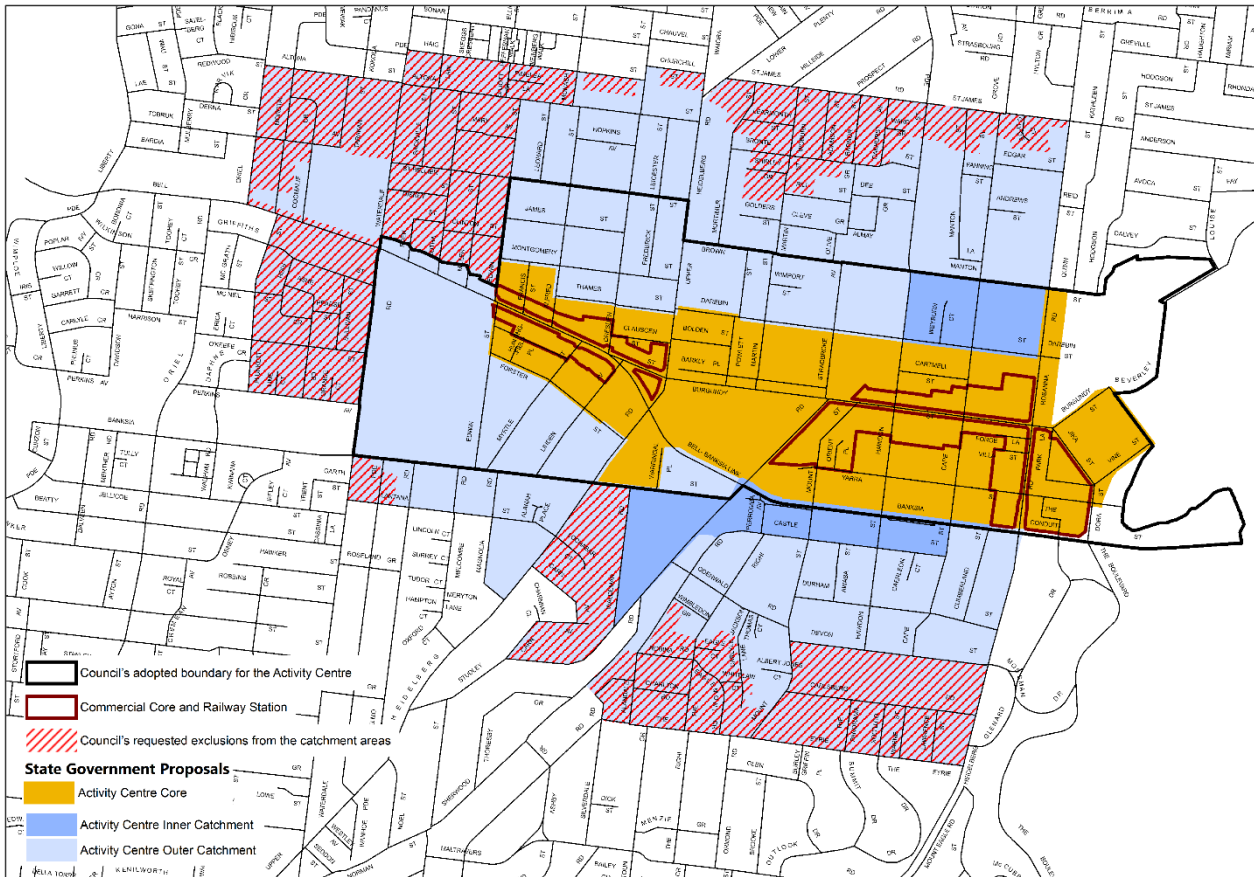
**Figure 14: Council's recommended exclusions from the proposed catchment areas by type**

However, Council re-iterates that mapping of the exclusion based on an 800 metre walkability threshold, shown in Figures 13 and 14, should be used as a guide as what is a minimum exclusion. This point is consistent with Council's comments about the limited nature of its own assessment. A fuller assessment should consider additional factors such as topography, demographics and other obstacles.

Council also notes that:

- Much of the land recommended for exclusion is recommended as such for more than one reason. For example, a substantial part of the land in HO118 (Ivanhoe Views Estate), much of the land between The Eyrie and Devon Street and much of the land in the Postcode 3081 UDF.
- All of the recommended exclusions are to land which is on the periphery of the proposed outer catchment, which means that, in mapping terms, it is a far easier logistical exercise to exclude the land.

For the ACP's reference, the following map shows Council's recommended exclusions as one treatment:



**Figure 15: Council's recommended exclusions from the proposed catchment areas**

## Limitations in the ACP's engagement with Council

A separate issue that Council wishes to highlight is that, unfortunately, the ACP's engagement with Council in drafting the core and catchments for Heidelberg and in seeking Council's feedback on this has had significant limitations. For example:

- Council officers have had very limited input into the preparation of the engagement maps. This is highly disappointing as Council has significant local knowledge of constraints, issues and opportunities for land around the Heidelberg Activity Centre.
- The current period of engagement is too short to allow Council to fully consider, including by research, and respond to the issues raised by the proposed mapping of the core and catchments.
- The ACP's material to support and explain the proposed mapping is very limited and rather superficial. All the material provided is very high-level with no expert reports clearly available to explain the proposed boundaries in relation to technical planning issues (e.g. protection of landscape values).

If Council were to conduct a planning exercise such as this, it would be expected that it would prepare and consider technical reports on a range of matters and that these would be available for scrutiny by the community through the amendment process.

# Conclusion

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Council notes that there are clear positives in the proposed mapping of the core, inner and outer catchments. It is particularly appreciated that the ACP is supporting Council's suite of proposed building heights for the core. Further, that the proposed application of inner catchment is modest. In addition, Council recognises and appreciates that certain areas of high sensitivity, such as certain large heritage estates have been excluded from the catchment.

However, there are still important issues with the proposed mapping that Council strongly recommends the ACP address. Actions recommended by Council to address these issues are to:

- Exclude certain areas from the proposed outer catchments, including land within the Postcode 3081 Urban Design Framework, certain land of particular environmental, heritage and/or neighbourhood significance in Eaglemont and Ivanhoe and land greater than 800 metres walking distance from the core commercial and/or railway station of the activity centre.
- Ensure the ACP has properly considered the potential conflict between its proposed catchment mapping and the latest findings on the risk of flooding to development capacity. It is particularly recommended that the ACP discuss this matter with Melbourne Water, who Council understands is significantly reviewing the mapping of flooding provisions.
- Support the higher maximum building height limits set by Council's schedules to the RGZ within the proposed catchment area. For many of these schedules, this recommendation is addressed by implementing Council's request that land in the Postcode 3081 Urban Design Framework be excluded from the outer catchment. For the RGZ1 on Bell Street, this could be handled in different ways.

Finally, Council unfortunately has to continue to express its continued disappointment at the limited meaningful engagement the ACP is conducting with Council and the community in preparing its planning framework for the Activity Centre.