

Activity Centre Program Submission

Banyule City Council

29 September 2024



Introduction

This submission has been prepared in consideration of the materials on the Engage Victoria website Activity Centres “[Activity Centres | Engage Victoria](#)” (the AC/EV site). Officers at Banyule City Council (Council) have prepared this submission under delegation, as due to timing of the Council Caretaker Period and the limited time provided to make a submission, it was not possible for a meeting of Council to consider this submission for adoption.

The City of Banyule (Banyule) has three Major Activity Centres, including Ivanhoe, Heidelberg and Greensborough. Council is fully committed to proper planning of these centres to achieve economic, social and environmental benefits for our community. Reflecting this, Council has in place activity centre controls, underpinned by a structure plan, for each of its MACs. Further, Council last year approved a new structure plan for the Heidelberg MAC and is currently well progressed with a proposed Amendment C172 to the Banyule Planning Scheme, which will implement a new suite of planning provisions in support of the new Heidelberg Structure Plan. That Amendment was recently considered by an independent planning panel and the Panel has recommended the Amendment be adopted, subject to certain changes.

Council notes that the AC/EV site proposes initiatives to increase the supply of housing in metropolitan Melbourne. In particular, the following two types of initiatives are proposed:

- Draft activity centre plans for the 10 activity centres that the State Government Housing Statement identifies will receive planning to provide substantial growth in housing. This includes the activity centres of Broadmeadows, Camberwell Junction, Chadstone, Epping, Frankston, Moorabbin, Niddrie, North Essendon, Preston (High Street) and Ringwood.
- A series of potentially far-reaching initiatives, under the heading Activity Centres Program, for all metropolitan and major activity centres. These initiatives particularly include:
 - a) An approach to conduct baseline planning for growth of each centre.
 - b) New “fit-for-purpose” planning products, including an activity centre plan, an activity centre overlay and schedules that give effect to the activity centre plan.
 - c) Mention of designation of a catchment around each activity centre
 - d) Mention of work on a simplified infrastructure funding mechanism
 - e) Mention of work on a policy to support the delivery of affordable and diverse housing in activity centres.

As none of the 10 activity centres listed under the first proposed initiative are within Banyule, this submission will not provide feedback on the draft activity centre plans for these centres. In contrast, the series of initiatives proposed by the Activity Centre Program (the Program) are relevant to all major activity centres, including those in Banyule, and so this submission will solely provide a response to the Program.

A first and underlining theme in Council’s response is that the initiatives proposed by the Program are highly significant, but that there is simply not enough detail and time provided for Council to be able to give meaningful feedback. Further to this, Council’s submission makes the following key points:

- There are significant issues with the proposed approach to conduct baseline planning for each centre.
- The proposed activity centre plans will create confusion with Councils’ own structure planning process for activity centres and, the proposed plans are too generic and vague on key matters.
- There is a lack of clarity regarding the function and content of the proposed activity centre overlay and Council is concerned the introduction of this overlay will add an unnecessary level of confusion in the content and approach of planning schemes regarding activity centres.
- The proposed approach to defining a walkable catchment for an activity centre (which will be used to provide higher residential densities) has certain limitations, such as defining the edge of an activity centre’s non-residential area as the point from which to measure the walkable catchment.

- The Program's consideration of a simplified approach to fund infrastructure is lagging too far behind initiatives to increase residential density.
- The initiative to use policy to support the delivery of affordable housing will unlikely be successful and a more regulatory approach is required.
- The initiatives of the Program are creating confusion as to which tier of government has responsibility for the planning of major activity centres, which may waste a significant amount of local government resources.

Engagement for the Activity Centre Program

Before responding to all the Program's initiatives, Council would like to detail significant shortcomings it sees in the engagement for these initiatives.

The initiatives proposed by the Program are highly significant for the planning of major activity centres, such as Ivanhoe, Greensborough and Heidelberg. For example, the initiatives could significantly change and standardise the methodology, processes and outcomes associated with activity centre planning.

However, engagement for the Program has been very limited, noting Council is not aware that any official announcement was made by the State Government of the initiatives proposed by the Program and the associated engagement. Further, Council considers that the initiatives proposed by the Program are not made sufficiently prominent within the AC/EV. Council particularly notes that the AC/EV site lists the Program as the last item on the page and then only as a link to a further page.

In addition, as discussed further below, the material provided for each of the Program's initiatives is very superficial. For example, there is a discussion of a new overlay and activity plan, but no examples of these are provided. Without concrete examples of these, it is very hard for Council to give any meaningful feedback.

A further problem is that the section on "Have Your Say" is very confusing. The first sentence under "Make a Submission" invites participants to have a say on the Program. However, the next section, "How we will use your feedback" appears to not connect with the previous sentence, as it states the feedback will be used to inform the preparation of the draft plans for the 10 activity centres. It is as if the secondary sentence is talking about how feedback to the draft plans will be used and not feedback to the initiatives of the Program.

The next section "What happens next" appears to again refer to the draft activity centre plans. For example, stating that the Minister may consider expediting approval for a planning scheme amendment to implement a draft activity centre plan. Again, there is no reference to what happens regarding the initiatives listed under Program. There is no explanation as to what the next steps are for the proposed activity centre overlay being developed for all activity centres.

It is difficult to find other information about the initiatives listed under the Program. The Events page on the AC/EV site only offers sessions dedicated to the separate activity centre plans. Whilst the site provides contact details for the VPA, Council's emails and phone calls to the VPA requesting clarification and further information have not been answered.

Council questions the timing of the exhibition, as it significantly overlaps with the Caretaker Period associated with Council elections being conducted in Victoria in October 2024. This timing and overlap would appear to significantly restrict, if not negate, the potential for Councils to consider and finalise a submission to the Program via a resolution of a public Council meeting.

Council has highlighted these shortcomings early in its submission as they very much restrict the depth of Council's comments to the initiatives proposed by the Program. Council's comments are now provided to each initiative in turn.

An approach to conduct baseline planning for growth of each centre.

It is Council's understanding that this section of the AC/EV site proposes a generic and streamlined stepped approach to defining the growth permitted in each activity centre, particularly by applying a standard suite of precinct typologies to each centre and tying this typology to building height limits. It is stated on the AC/EV site that the proposed suite of height limits will "allow enough development to accommodate the new homes Victorians need while still being appropriate to their setting".

Council has identified the following key issues regarding the proposed planning approach:

Lack of clarity as to what has been done and is yet to be done

Council finds the explanation of what has been done and what is yet to be done is unclear. The confusion is created by several conflicting statements and maps, which are explained as follows (with illustrative emphasis added):

- The first statement cited above (i.e. "We **have** developed baseline planning controls for each of Melbourne's 130+ metropolitan and major activity centres.....") indicates that the State Government has already used the three step process outlined on the AC/EV site to draft planning controls for each activity centre, including Banyule's activity centres at Heidelberg, Ivanhoe and Greensborough.
- This message is further supported by certain statements explaining the methodology for the baseline approach. For example, a statement under Step 1 (Rate each activity centre against the density index) which states "Each activity centre **has been given** a rating based on its access to jobs, services and public transport."
- However, a map to support Step 1 of the process indicates a density allocation has only been estimated for the 10 activity centres identified in the Housing Statement.

If the baseline approach has been applied to each activity centre and if each centre has been given a rating, then this information should be provided as part of the engagement for Council to consider.

Step 1 (Rate each activity centre against the density index) is unclear and appears very limited

This Step 1 is a crucial step in the process, as it provides each centre with a density index based on its access to jobs, services and public transport and, this index has the hugely significant role of defining the level of density the centre can accommodate.

Council contends that assessing the proposed density of a centre by simply estimating access to jobs, services and public transport is too limiting. This proposed approach does not consider other considerations which are hugely important to defining a suitable proposed density, such as environmental constraints (e.g. topography, flooding, contamination and environmental values), heritage to be protected, preferred character and the size of the centre.

Council also comments that the explanation provided of Step 1 is confusing, particularly because graphs, which are provided that appear crucial to explaining the step, are not clear. For example:

- Under the graph heading "access to employment" it is not clear what the figures provided are defining.
- The graph applies the maximum value to centres up to 2.5 kilometres from the CBD, but appears to give no value to centres further away.

Step 2 (Divide each precinct into precinct typologies) is too limited and unclear

The proposed range of eight precinct typologies does not sufficiently identify the full range of important uses that can exist within an activity centre. There seems to be a lack of scope to identify civic, health and other community uses. The Heidelberg MAC provides a primary example of this limitation. A regionally significant health precinct, comprising particularly the Austin Hospital, is contained within the Heidelberg MAC. Council's

structure planning for the Heidelberg MAC has paid particular attention to supporting the growth of the health precinct in the Heidelberg MAC, including by providing a precinct dedicated to this use. None of the typologies offered by the AC/EV site appear to suitably fit with identifying and enhancing a health precinct. Council expects that this lack of correlation between the proposed precinct typologies and particular preferred uses will occur in other centres.

Council finds that the purpose of the precinct typologies lacks clarity. Part of this problem is that no definition of the precinct typologies is provided. Whilst the names of certain proposed precincts provide some indication to the intended role, such as "Residential", others are not clear, such as "Fringe" and "Limited Sensitivities". Further, certain typologies have a name which relates to land use, such as "Shopping Centre" and "Residential", whilst others have names which relate more to the rate of potential change, such as "Large Opportunity Sites" and "No Change". This switching between land use and capacity to define a precinct's name creates confusion as there is then the opportunity to apply two or more typologies to certain land. For example, "Fringe" or "No Change" could also be applied to "Residential".

There are issues with the proposed building height limits

As commented above, the AC/EV site clearly sees the proposed height limits as providing sufficient residential growth to accommodate the new homes Victoria needs. An issue with this approach is that it assumes that sufficient development within the proposed height limits will be for residential growth. However, as per Council's comments earlier regarding the precinct typologies, there may be a demand within a centre to devote a significant amount of that growth to non-residential uses. For example, it is expected that a considerable portion of the growth in the Heidelberg MAC will be for expansion of the centre's regionally significant health sector.

The suite of proposed height limits is tied to the precinct typologies, and it is very hard to comment on the appropriateness of the proposed height controls without their being a clear understanding of the definition of each typology. As noted above, there is no clear definition of the role of each proposed precinct, including from the proposed names.

A final issue is that the height limits for certain precincts could be overly restrictive. For example, the specified height limit in the residential precinct, without variation for density index, is 17 metres (this would appear to be approximately 5 storeys in height). However, Council expects that in certain precincts designated for significant residential growth, such as in an inner-city location, that building height limits above 17 metres could be appropriate in a residential precinct.

The proposed process for developing planning controls is disjointed

The process as detailed on the AC/EV site does not conduct a site context analysis for the centre until late in the process, after the baseline planning controls for the activity centre are developed. However, it is well accepted that a site context analysis should be conducted early in a planning process. This approach allows issues and opportunities to be identified early and to inform future planning. To leave this step to the near end of the process leaves important considerations until too late in the process. Examples of these considerations are:

- Environmental constraints, such as flooding, topography and contamination.
- Elements important to the preferred character and amenity of the centre, such as key views.

Council is concerned that if the site context analysis is done during the last phase of the proposed assessment process, this will undermine the process by:

- Not allowing important considerations (such as environment considerations) to suitably guide development of the planning expectations and controls.
- Creating undue pressure and poor decisions to try and retrofit the baseline planning controls to accommodate planning issues and opportunities that should have been considered earlier.

For these reasons, Council contends the site context analysis should be conducted early in the process to develop planning controls for a centre.

Over-emphasis on the existing situation to define future growth

There is an almost singular focus in the explanation of how planning controls will be developed on responding to the existing context. For example:

- Each activity centre is given a density index based on its current access to jobs, services and public transport.
- The precinct typologies are based on existing character, building types and development opportunities.

This approach does not appear to sufficiently consider the following for each centre:

- A vision
- A preferred character
- Opportunities to modify the suite of land uses and development to reflect emerging trends or opportunities. For example, to reflect the greater demand to work at home and new and emerging forms of transport across Melbourne, such as e-bikes.

If the proposed planning process is too tied to existing conditions, it could undermine the ability of the process to suitably plan for Melbourne's growth, including in relation to suitably planning for residential growth.

There is insufficient community engagement in the proposed process

No provision is made in the process for community consultation. Council is committed to engaging with its community on key decisions, as this engagement is highly important to reviewing and improving proposed decisions. Further, the engagement provides Council and other planning agencies with the opportunity to explain why it is proposing certain actions. For example, it allows the community to hear that initiatives in support of activity centre planning are proposed to address a range of social, environmental and economic challenges facing metropolitan Melbourne and the wider world, such as over-reliance on private vehicle travel, urban sprawl, planning for an ageing community and addressing the housing crisis. If the proposed planning process does not sufficiently allow for real community engagement, it will be to the long-term detriment of the process in terms of the quality of the outcomes and the community willingness to support initiatives.

Council would like to add at this point that it is being asked to provide comment on a highly important approach to baseline planning in activity centres, with far reaching consequences for land use and development in Banyule and wider Melbourne, but without sufficient time and explanation to properly consider what is proposed.

Notwithstanding the above significant issues, Council does feel there is a positive in the State Government providing an approach to determine preferred densities, building height limits etc. However, this should be provided to Council as one of various tools to consider and adapt to the local context.

An Activity Centre Plan

The AC/EV site introduces the Activity Centre Plan as one of two planning products being introduced to help deliver more homes in activity centres across Melbourne. There is little detail on the generic function and content of an Activity Centre Plan where it is discussed under the Activity Centre Program.

However, Council has been able to ascertain more about the content and function of this document by looking at examples that have been drafted for the 10 activity centres that are the subject of the Housing Statement. From reviewing the draft Activity Centre Plans, Council understands that the plan is primarily focused on providing significantly more housing for each activity centre, particularly by setting a new residential catchment for each activity centre and recommending planning controls that allow development of 3 to 6 storeys within the new catchment.

Council contends that a key question that is not answered by the Program in proposing the Activity Centre Plan is how this document will interact and support a Council approved structure plan, which covers both land use

and development for the whole activity centre. Using the Broadmeadows Activity Centre Plan as an example, there is very little reference to existing strategic work done by Hume City Council to plan the activity centre. The apparent lack of correlation with a Council's own strategic work would appear to cause some confusion. Council proposes that it would make more sense to amend the existing structure plan to provide one key strategic document, rather than two, which informs planning for the centre.

Also, the recommendations of different Activity Centre Plans appear too generic in parts. An example is that all the documents have the same examples of four to six storey development precedents, which are shown by a series of photos across all documents. In certain documents, e.g. the Epping and Preston Activity Centre Plans, there appears to be little more than these photos to guide development. This "one set of designs fits all" approach to housing does not appear appropriate, because it does not suitably support development that responds to the particular features of an activity centre, such as the amount of vegetation, its topography and particular view lines that need to be protected.

Several of the Activity Centre Plans seem to be lacking content to guide development in relation to various important contextual planning topics. Instead, there tends to be broad statements about future strategic work to guide development in relation to matters such as providing affordable housing, funding infrastructure, updating planning controls for a range of purposes, updating flood management controls and removing non-residential uses in catchment areas.

An Activity Centre Overlay

Council notes that it has been a key part of State Government Activity Centre Policy to promote use of the Activity Centre Zone (ACZ) to implement planning objectives relating to both use and development in an activity centre. In Council's view, this provision has been an effective tool to manage the planning of key growth areas of an activity centre. A particular positive feature of this zone has been the clear inclusion and co-ordination between the land use and built form provisions within the same zone. Further, it has streamlined the provisions applied to an activity centre. Council has articulated its support for the ACZ by already applying this provision to the Greensborough MAC and currently proposing, via Banyule C172, to apply it to the Heidelberg MAC.

Given the State Government's past support for the ACZ, Council would expect that any proposal to introduce an activity centre overlay would be clearly explained by the State Government. However, it is Council's view that this explanation has not been provided by the AC/EV site. Only a few dot points are provided to explain the proposed overlay. For example, that it will give effect to building heights, setbacks, overshadowing protection and wind minimisation. These points do not explain why it is being introduced. No examples of this overlay are provided.

Council's concern with the introduction of the Activity Centre Overlay is that it will create a confused suite of planning controls for an activity centre. If it is to work in unison with the ACZ, this will be a highly confusing situation for residents as they will be faced with both an activity centre zone and an activity centre overlay. In addition to this, there will be an activity centre structure plan and the proposed Activity Centre Plan. It cannot be understated how confusing that range of activity centre planning provisions will be for residents. The State Government has stated through recent projects, such as the PPF translation project, that it seeks to make planning more straightforward so as the community can better understand. The Program should be led by the same principle.

It is stated on the AC/EV site that the new overlay will support a streamlined approval pathway for compliant planning applications. However, the ACZ already provides scope for quite extensive exemptions from notification, noting notification and third-party appeal rights are the major stumbling blocks in terms of time for development applications. The AC/EG site should explain what the streamlined approval is and why it is required over and above what is already provided by the ACZ.

Schedules for each Activity Centre Plan

The AC/EV states that bespoke provisions will be provided for each activity centre that give effect to the Activity Centre Plan. There is no discussion as to what matters these schedules will handle and how. Without this information it is impossible for Council to provide any feedback on this proposal. Council's and communities must be given an opportunity to consider any changes like this.

The Catchment for each Activity Centre

It is stated by the Program that the State Government has designated a catchment around each activity centre, covering the area within walking distance of the local jobs, services and public transport. As per the draft Activity Centre Plans, it is stated that these catchments will be used to provide development of 3-6 storeys.

If, as stated, the State Government has designated a catchment area for each of Banyule's activity centres, Council would have expected these catchments to be presented as part of the request for feedback. However, the AC/EV site does not show designated catchments other than those for the 10 activity centres. This omission again limits Council's ability to provide feedback.

Importantly, no discussion is provided under the Program as to how these catchments have been determined. Instead, some information is available on this in the draft Activity Centre Plans. Council notes that these plans state that a catchment was defined by measuring 800 metres walking distance using streets from the edge of an activity centre's non-residential area. Further, the catchment was refined to accommodate natural and physical barriers, planning or environmental constraints and areas subject to future planning investigations.

Council supports the use of 800 metres as a distance, as it is Council's understanding that is approximately what an individual can walk within 10 minutes. However, Council does question the use of the edge of the non-residential area to define the start of a catchment. The edge of a non-residential area can be a long way from the key services and other destinations within an activity centre and therefore, using the edge can set an unrealistic walkable catchment for many residents. This can be particularly the case if the non-residential area has quite a spread-out configuration, rather than a clear consolidated core.

Council has some concerns regarding how natural and physical barriers were identified and responded to. Council could not find a clear description of what were considered as natural and physical barriers and what impact these had on refining a catchment. Council contends that a wide range of natural and physical barriers can impact on defining the extent of a walkable catchment. For example, barriers such as busy roads, railway lines, topography and a lack of shade. The last item, lack of shade, is becoming ever more important as metropolitan Melbourne increasingly experiences the heat island effect. It is Council's experience that defining all relevant physical and natural constraints requires a certain subjective assessment and often local knowledge. Given the above points, Council questions whether the assessment has identified sufficient types of barriers and given them sufficient weight.

Simplified Infrastructure Funding Mechanism

Council considers that the funding of public infrastructure is hugely important to supporting higher densities in metropolitan Melbourne. Council notes, for example, that as higher densities occur around Banyule's activity centres, the need to provide public open space is extremely important. People living in higher density areas need public open space to relax, kick the ball with their kids, fly a kite, have a picnic etc. However, providing open space in this scenario is very costly as it requires a mixture of providing new public open space, supporting

existing public open space to cope with additional demand and improving pedestrian connections (often across main roads) to existing public open space.

It is Council's experience that the existing mechanisms for funding public infrastructure, such as a Development Contributions Plan (DCP) and the Open Space Levy, are laborious. A key problem is that they are tied to the planning scheme and therefore require a planning scheme amendment to be implemented or varied. Council recently conducted an informal review of lessons learnt from nearby similar Councils in introducing, implementing and updating their DCP Framework and found that Councils commonly expressed as a serious issue that it takes too long and too much work to introduce and update a DCP Framework through the planning scheme and this is compounded by the fact that a Framework needs to be regularly updated.

The AC/EV site states that the State Government is "working on a simplified infrastructure funding mechanism to fund the things your future suburb needs" and that "this mechanism could provide direct contributions for councils and State Government to deliver essential infrastructure like roads, community centres and local sporting facilities to support growing and changing communities".

Whilst it is a positive that the State Government is working on this, there is a significant lack of detail as to what is proposed, particularly in comparison to the other work detailed in the AC/EV site to define increased residential densities and higher building height limits around existing activity centres. This lack of detail of how to best fund public infrastructure is concerning, as it strongly indicates that progress in determining and implementing an approach to this important matter of funding public infrastructure is lagging well behind work to increase residential densities. This lag could mean that Melbourne is about to experience a significant increase in the supply of medium and high-density housing, but without the framework in place to provide timely and sufficient improvements to public infrastructure. The consequences of this could be wide-reaching and serious. For example, there could be well below the public open space required to support the new housing, which is a situation that would have consequences for residents' physical and mental health.

Consistent with its above comments, Council strongly recommends that the State Government expedites developing and implementing a simplified infrastructure funding mechanism and implement this in tandem with initiatives expressed on the AC/EV site to significantly increase residential densities in much of Melbourne.

Policy to support affordable and diverse housing in activity centres

The State Government has for a long time grappled with how to provide more affordable housing and housing diversity in metropolitan Melbourne. The approach to date has been to have broad statements of intent within the State Planning Policy Framework, but to leave the development industry unregulated in relation to affordable housing and diverse typologies. It is Council's experience that this approach has not been successful, simply because policy statements are not mandatory, and the development market chooses not to provide sufficient affordable housing or diversity of housing. The clear lesson is that the State Government needs to take a more hands-on approach which regulates the development industry to meet the community's needs in relation to this topic. Council finds it disappointing, therefore, to read on the AC/EV site that the State Government is working on a policy to support the delivery of affordable and diverse housing. A more regulatory approach is required. For example, a provision in metropolitan schemes that requires a minimum provision of affordable housing and different types of housing. This is supported by the Victorian Housing Statement which states an intention to increase the supply of affordable housing.

Responsibility for Planning Activity Centres

A final and wide-ranging comment that Council will make regarding the Program, as proposed on the AC/EV site, is that the Program is potentially creating a very confusing and costly situation for local government in planning for its activity centres.

It has been a long-standing requirement of State Government Planning Policy that whilst the State Government defines the location and number of major activity centres in metropolitan Melbourne, local government has the role of planning for each activity centre. To that end, local government is required to prepare a structure plan for each of its activity centres and introduce a planning scheme amendment to implement the structure plan through the planning scheme. This is a very time consuming and expensive process for Councils, noting:

- The technical reports and community consultation required to inform the preparation of a structure plan.
- The specialised work required to draft planning scheme controls.
- The significant costs of conducting a planning scheme amendment, which typically include a substantial outlay for the cost of an independent planning panel.
- The significant drain on staff hours, considering it typically takes several years of substantial work from the time of commencing development of a structure plan to completing the planning scheme amendment that will implement the plan.
- The forward planning that must be done to prepare for the preparation of a structure plan and planning scheme amendment in terms of staff allocation, project planning, Council budget and procurement.

Every significant variation that the State Government proposes or makes to this process can add a level of uncertainty, which then adds to the cost, duration and complexity in completing the process.

In the initiatives for its Activity Centre Program, the State Government appears to be proposing a substantial and unprecedented change to the current situation by replacing local government as the body primarily responsible for completing the structure planning and planning scheme amendment for an activity centre. There are two key logistical issues for Council with how this approach is presented in the AC/EV:

- The proposed extent and timing of a broader role for the State Government in planning for each activity centre is not at all properly explained or defined. This creates confusion for Council as to what extent it should continue to plan for its activity centres, how it should plan and what level of resources should be dedicated to this task.
- It creates confusion as to what planning settings Council should apply to its activity centres. For example, the Activity Centre Zone is still cited in State Government policy as the preferred planning provision to be applied to activity centres, yet the AC/EV site appears to be questioning this stance.

To address these matters, Council believes the State Government firstly, needs to clearly articulate the extent to which it proposes to increase its role in the planning of Melbourne's activity centres. Further, it needs to clearly articulate to Council what suite of planning provisions it proposes for activity centres.

Council would like to finish this section by stating that it is highly concerned at a situation where the State Government assumes the primary role of planning for all activity centres, including Banyule's. Council believes this would create an excessively generic planning regime across Melbourne's centres which would not properly identify and respect important local attributes such as, environmental values, topography, key views and local character, identity and heritage. To not sufficiently recognise these attributes will create a community backlash to activity centre planning, which would be to the detriment of the good outcomes sought by activity centres.

Conclusion

Council has several significant concerns regarding the engagement currently conducted and the initiatives proposed under the Activity Centre Program at the AC/EV site.

There has been insufficient notice of the engagement, the timing of the engagement is inappropriate due to the clash with Council caretaker period, the explanation of the engagement and what happens next is unclear and there is insufficient detail on key initiatives proposed by the Program.

The details that are provided about initiatives proposed by the Program raise a few key issues for Council. For example:

- The initiatives propose too generic an approach to providing residential growth and do not give sufficient early consideration of local conditions and objectives.
- An initiative to improve the provision of infrastructure is given insufficient attention in comparison to initiatives to increase residential density.
- The proposed suite of planning provisions is very unclear and appears too complex.
- The proposed approach to provide more affordable housing is likely too weak as it appears to continue to rely on a policy approach.
- The proposed role of the State Government in activity centre planning is very unclear.

As a consequence of these issues, Council is concerned that the approach to planning for activity centres is becoming increasingly muddled, creating wastage of public funds (including Council resources), is creating an over-simplistic generic approach to housing growth that will be to the detriment of local community values and finally, that the approach is not sufficiently considering the need to provide for additional public infrastructure to support increased residential density.

Council believes that the State Government has scope to address these issues, particularly by:

- Providing proper engagement on the Activity Centre Program, including to fully detail what is proposed.
- Proposing to advance a scheme that will more efficiently provide contributions to fund infrastructure in tandem with initiatives to increase housing density.
- Proposing to maintain for Council and the community a clear and significant role, from an early stage, in the planning for activity centres.
- Proposing a stronger regulatory approach than planning policy to provide sufficient affordable housing.