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To whom it may concern,

Merri-bek City Council National Energy Performance Strategy Consultation Submission

Merri-bek City Council welcomes the opportunity to provide a submission to the National Energy Performance Strategy.

Merri-bek is proud of its record in developing and delivering innovative initiatives that help lead the way for the local government sector across Australia. Merri-bek acknowledges we are in a state of climate emergency that requires urgent action by all levels of government. Council has also committed to collaborate with others to investigate innovations that transition our community to a smart, decarbonised, decentralised and socially just energy system.

The following submission has been prepared by officers and is based on endorsed Council strategy and policy positions.

Alignment with current Merri-bek Council policies

Merri-bek's Zero Carbon Merri-bek 2040 Framework sets out Council's vision for a zero carbon future by 2040. Part of this vision is for homes and businesses to be powered only by renewable electricity, following a supported phase-out of gas. Given that the impacts of climate change are escalating rapidly, Council, in 2021, adopted more ambitious targets for a zero carbon community by 2035 and interim goals to set us on the course to zero carbon.

Council's Zero Carbon Merri-bek Climate Emergency Action Plan 2020 -2025 has specific actions to accelerate the energy transition including:

- Ensure Merri-bek residents, community organisations, schools and businesses have access to trusted information and advice, services and funding options that support their adoption of energy efficiency and renewable energy.
- Lead the collaborative project to raise the standards of Environmentally Sustainable Design (ESD) through the planning scheme required in new homes, commercial and industrial development (Towards Zero Carbon in the Planning Scheme).

- Partner with others to advocate for and provide targeted support for low income and vulnerable households to avoid 'energy poverty' and be more comfortable (thermal comfort) in their homes during extreme weather.
- Ensure Council builds highly energy efficient facilities, including onsite renewables and 'no new fossil gas'.

Strategy Focus Areas

2.1.i Governance – Energy Governance

We support the collaboration currently being undertaken by the Australian, State and Territory governments to coordinate and collaborate energy policy including the National Energy Performance Strategy. However, the consultation paper is silent on the role of local government.

As the level of government closest to communities, local government plays a significant role in the delivery of energy performance projects and promoting / supplementing Federal and State government incentives and programs. Australian local governments have ambitious plans for emissions reduction in their communities. When the targets set by Australian local governments are met, 88,200 kt CO₂e emissions will be reduced.¹ 67% of Australian councils responding to the 2021 Local Government Climate Survey have set or are in the process of developing community emissions reductions targets, with an understanding that anything other than a net zero target is not acceptable from a climate risk or ambition perspective.²

Councils have a proven history in delivering energy efficiency and renewable energy projects, not only on their own assets, but also with their communities. Local governments also play a significant role in the planning process, including influencing the performance of how new homes and businesses are built. Within the top five emission reduction projects that Australian councils are undertaking is the requirement for strict sustainability criteria factored into planning processes.³ Further, 29% of Australian councils conduct energy efficiency retrofits and upgrades programs.⁴ Not only have councils become a trusted source within their communities, they have a wealth of knowledge and capacity to help deliver on the key objectives of a National Energy Performance Strategy. Local governments have access to local data, population and housing growth data all at a level which can be utilised to inform future demand estimates.

Merri-bek is leading by example by setting new benchmarks and initiatives to increase the energy performance of buildings within our municipality. Through this work, Council, and our development

¹ Lynch, A., Oke, C & A. Leavesley (2021). *State of play: Local governments and city networks accelerating climate action in Australia*. ICLEI Oceania. June 2021.

² <https://www.globalcovenantofmayors.org/impact2019/>

³ Lynch, Oke and Leavesley, *State of Play*.

⁴ Lynch, Oke and Leavesley, *State of Play*.

community, have gained knowledge and key insights on how to make our homes and businesses healthy, comfortable and reduce emissions.

Recommendations:

1. Improve the coordination mechanisms, and information and knowledge flow by including Local Governments in the Governance arrangements for a National Energy Performance Strategy
2. Clearly outline the role/linkages/contribution of the National Energy Performance Strategy:
 - a. in responding to Climate Change/Australia's obligations under COP27, UNFCCC, and to limiting global warming to 1.5°C.
 - b. to the National Electric Vehicle Strategy for the transport sector, and reforms to the Safeguard Mechanism for the large resources and industrial sectors
 - c. to the Roles and responsibilities of private sector, industry, community and different levels of government.

2.1.ii Governance – Targets

Merri-bek supports the development of energy efficiency targets to provide the framework to drive Government policies and programs for energy efficient buildings in Australia. The establishment of short and long-term targets will take into consideration the need to take urgent action ('no regrets measures') this decade as well as providing a pathway to net zero. Targets should be set for economy-wide and sectoral targets for residential buildings, commercial buildings, industry and transport.

With the target established, progress should be measured and reported yearly to allow for public accountability, opportunity to track progress and adjust initiatives as needed. Yearly progress reports should be undertaken by the Climate Change Authority and included in the Minister's annual climate change statement to Parliament.

Recommendations:

3. Develop targets for 2030 and 2050 with economy-wide and sectoral targets for residential buildings, commercial buildings, industry and transport; and
4. Ensure methodologies used for establishing and implementing targets include a delineation between demand and supply side improvements to avoid double counting.

2.2.i Residential – General

For local government the key opportunities to improve the energy performance of new and existing residential buildings are:

- **Improving energy performance via state and territory-based Planning Schemes**

A national strategy needs to recognise and support the associated state and territory Planning Schemes, and the integral role in implementation that local governments play in improving the energy performance of homes and businesses through the planning scheme. Consistency across state and territory borders, as well as strengthening the partnerships between all levels of governments is therefore needed in a future National Energy Performance Strategy. Victorian local governments have long had both the desire for planning scheme improvements, as well as success in delivering on these ambitions.

An action of the Merri-bek City Council's Zero Carbon Action Plan is *Achieving Zero Carbon within the Planning Scheme*. Through Merri-bek's leadership, 24 Victorian councils have collaborated to lodge a joint planning scheme amendment that elevates sustainability requirements for new buildings and encourages a move towards net zero carbon development. The councils are all members of the Council Alliance for a Sustainable Built Environment (CASBE) and the project supported by the Municipal Association of Victoria (MAV).

The [Elevating ESD Targets Planning Policy Amendment](#) seeks to build on the current Environmentally Sustainable Development (ESD) requirements for new developments and in doing so, better protect the natural environment, reduce resource and energy consumption, and support the health and wellbeing of future occupants. The amendments include detailed, measurable targets that will deliver meaningful outcomes in practice.

The 24 Councils represent approximately half the Victorian population and planning activity. By working together councils can share costs and knowledge and provide clarity and consistency for the development community. An indicator of a successful Energy Performance Strategy at the national level would be one that could drive more consistency across all planning schemes in relation to improving energy performance.

- **Gas free and all electric new buildings**

Merri-bek has a successful history of engaging with developers to encourage all-electric buildings. We have developed a strong body of evidence showing that gas-free developments are technologically feasible, commercially viable and acceptable to the people who live in them. Merri-bek is seeing a growing trend for all-electric builds with no gas connections across a range of development scenarios and typologies.

Merri-bek strongly encourages new buildings to be gas free and fully electric in the National Construction Code.

- **Compliance and Enforcement.**

While there has been an increase in the thermal performance of buildings, there is the need for robust, independent compliance processes to ensure energy performance standards are built.

Merri-bek has an active Environmentally Sustainable Design (ESD) compliance and verification program. ESD onsite non-compliance occurs when ESD measures are committed to in sustainability tools such as the Built Environment Sustainability Scorecard (BESS) and Green Star through the Planning Process but not included in the final constructed development.

In 2020, Merri-bek undertook an ESD Compliance research project which included a desktop⁵ review of planning and building permit drawings of 277 developments, 16 site inspections by staff and another 28 via aerial imagery, Occupancy Permits and drive by inspections. The research found that the level of ESD features approved at the planning stage, that were also in the building permit documentation, was only 45%. This means that 55% of the dwellings had markedly reduced energy performance in the construction stage, compared with planning, resulting in higher energy costs for residents and reduced building energy performance.

Merri-bek has introduced new initiatives to reduce the levels of non-compliance including education reports and an increase of on-site inspections. However, we need a systematic approach to improve compliance. Merri-bek's ESD compliance program is unique in Victoria with most Councils unable to fund compliance staff and programs.

To improve compliance the strategy needs to include:

- Development of an independent, well-resourced regulator with adequate tools and powers to address non-compliance;
- Funding for Planning and ESD Enforcement in local government;
- Inclusion of compliance and verification in the National Construction Code; and
- Mandatory training of Building Surveyors, certification and auditing.

Existing Programs:

- Support expansion of programs like the Victorian Residential Scorecard and mandatory disclosure at point of sale and lease.

⁵ Desktop because of Melbourne covid restrictions.

- **Support local governments' communications and programs for electrification**

Merri-bek Council is supporting our community to be a part of Australia's transition to clean energy by going all-electric. We launched our [Electrify Everything communications campaign](#) which includes practical tips, resources and delivery partners to help Merri-bek residents electrify their homes.

In late 2021, Merri-bek launched its [Electrify Everything: Communications Message Guide for Households](#). An Australian-first, the guide is based on qualitative market research we undertook to inform our communications campaign for homes and businesses. Merri-bek is now leading a Community of Practice with over 90 local councils from across Australia focused on communicating the importance of electrification for Australia's energy transition and how households can get involved. The Community of Practice aims to share resources, learnings, and knowledge, to amplify impact, and to support each other throughout the campaign.

The local government sector is currently planning a national collaborative communications campaign to fill a gap not currently being addressed by state or federal government. The shared communications resources will be tailored for local communities and programs. Whilst we are proud of our work in this space, all communities across Australia should have access to the same, consistent information. There is a significant opportunity for the National Energy Performance Strategy to provide this access.

- **Reach diverse communities with trusted communicators and local-specific information in everyday language.**

To empower consumers to undertake energy improvements in their homes, we need to ensure that we are reaching a diverse audience and members of our community most impacted by increases in energy prices and underperforming housing.

There is a cultural and language barrier to accessing existing energy rebates and information. Trusted communicators and local-specific information in everyday language is needed to reach diverse communities.

In response to the COVID pandemic, Merri-bek established the Merri-bek Connectors program to help us communicate with and hear from community members who speak languages other than English. Connectors help us to understand our community's needs and barriers to inclusion. Merri-bek Connectors sit between Merri-bek City Council and the community. They share weekly messages using existing community communication channels (e.g. WhatsApp groups, meetings etc.) and give us advice on the best ways to communicate with their community.

We have been working with our Community Connectors to communicate our energy efficiency services and subsidies and how to access state government subsidies. The funding of local energy advisers (on a regional level) from diverse cultural backgrounds would assist in the delivery of energy services and information. With secure funding, culturally-diverse energy experts can use their local networks, build trust, and deliver energy performance services supported by federal, state and local governments directly to residents.

- **Introduce funding mechanisms for residential energy performance improvements**

With the average Australian home performing at 1.7 stars⁶, the enormity of the retrofit requirement within the residential sector to improve energy performance standards cannot be understated.

Despite this opportunity, many households are also experiencing significant cost of living pressures, which are likely to prevent many households acting to improve their energy performance.

A future strategy needs to include how State and/or Federal governments can provide access to sustainable funding streams to support these retrofits over the long term. Prioritisation should be given to populations with increased vulnerabilities/ low-income homes.

Residential General Recommendations:

5. Work closely with states and territories to introduce consistent ESD Policies for developments into their respective State Planning Policy Framework and local ESD Planning Policies, that are also consistent with the National Energy Performance Strategy.
6. Inclusion of 'de-gasification' and prioritising fully electrified buildings in the National Construction Code;
7. Improve compliance and verification with the development of an independent, well-resourced regulator with adequate tools and powers to address non-compliance;
8. Work with all levels of government to establish sustainable funding models for ESD enforcement in local government;
9. Include compliance and verification in the National Construction Code;
10. Support mandatory disclosure of energy performance of residential properties at point of sale and lease;
11. Develop a public communications campaign to promote energy efficient, all-electric homes as safe, healthy, and part of a clean energy future;
12. Support local governments' communications and programs for electrification;
13. Develop information resources and fund education programs that include trusted communicators and local-specific information in everyday language to reach diverse communities;

⁶ COAG Energy Council (2019) Report for Achieving Low Energy Existing Homes.

14. Fund the employment of local energy advisers from diverse cultural backgrounds to deliver energy services and information;
15. Provide people with user-friendly information and tools to understand energy performance “star” ratings, and the potential long-term benefits of energy efficiency to encourage take-up beyond the minimum performance standard;
16. Devise sustainable funding mechanisms to allow for all residents and households to have access to finance for energy performance improvements; and
17. Expand MEPS scheme, and rollout point of sale information for household appliances.

2.2.ii Residential - Low-income households

We agree that more can be done to assist low-income households who are at greater risk with increasing energy prices, poor performing homes, and health vulnerability.

Merri-bek recognises the need to support people on a low-income and have undertaken a number of support programs. Merri-bek currently offers a Solar/Thermal Support program (20/21 - current) for low income and culturally and linguistically diverse residents to undertake energy efficiency upgrades and the installation of roof-top solar to reduce energy bill stress and improve thermal comfort. This program was built on the Cooling Communities Program, developed by Merri-bek and delivered in partnership with Aboriginal Housing Victoria and the Australian Energy Foundation. This program won a United Nations Environment Program Award in 2017.

Merri-bek has also worked with the Victorian Government on the Energy Savvy Upgrades program offering subsidised energy efficiency and renewable energy upgrades to households struggling to pay energy bills. The Healthy Homes program delivered by Sustainability Victoria demonstrated similar outcomes with a focus on public and social housing residents.

We have found that the administration and trusted facilitation process that Council provides is critical for delivering long-term program outcomes. Program participants are typically inexperienced with managing upgrades, and rarely knowledgeable about subject matter. Without the facilitation process, retrofit programs are at risk of failing to obtain take-up, and when homes have been upgraded, they are at risk of failing to deliver on their original intent.

Residential - Low Income Recommendations:

18. Utilise the findings and success of programs such as Victorian Energy Smart Upgrades, Healthy Homes and Energy Savvy, and support the expansion of well-designed programs to provide financial and energy advice services, and improved thermal comfort (in heat waves, and cold winters) for low income and households at risk of energy stress;

19. Utilise the findings of the Healthy Homes program to set standards to improve the thermal efficiency and comfort of new public and social housing, thereby also improving health outcomes for those most vulnerable;
20. Work with state and territory governments to ensure additional funding is provided to ensure all new social housing is 7.5 stars, all-electric and renewably powered; and
21. Provide further funding to address climate vulnerability among existing social/ public housing tenants.

2.2.iii Residential – Renters

Merri-bek has a high proportion of renters with 34.7% of households living in private rentals. As acknowledged, renters face significant disadvantage in improving the energy performance of their homes due to the split incentive. From Merri-bek's experience, rental properties can only be improved by increasing regulatory requirements.

We recommend that the two regulatory changes to be implemented by 2025 are:

- Mandatory minimum energy efficiency performance standards for rental properties.
- Mandatory disclosure of energy performance for all buildings when they are sold and leased.

Remove disadvantage for rental apartments

From March 2023, Victorian rental properties must have a fixed, energy efficient heater in the main living area. However, in apartment buildings, the heater does not need to be energy efficient if:

- It would cost more than the average cost of installation
- It would cost more to meet other Acts or local laws
- The owners corporation rules prohibit it.

We recommend that this variation for apartments be removed otherwise apartment renters will continue to be disadvantaged.

Residential – Renters Recommendations:

22. Mandate minimum energy efficiency performance standards for rental properties by 2025;
23. Mandate mandatory disclosure of energy performance for all buildings when they are sold and leased by 2025; and
24. Remove any variation that disadvantages apartment renters.

2.2.iv Residential Apartments

Merri-bek has a very high proportion of residents living in apartments with 48.2% of households in medium and high-density housing.

In 2022, Merri-bek, in partnership with Yarra City Council, commissioned the research project *Unlocking Sustainable Strata*. The project brought together collaborators to learn, trial and design effective solutions so people who live in existing apartments and town houses benefit from sustainability retrofits and enjoy comfortable, efficient homes.

As the number of Australians living in these dwellings grows, retrofitting multi-dwelling buildings becomes more challenging but solutions do exist, as does the desire for improvement. A concerted and collaborative effort is required to develop mechanisms - legislation, incentives, funding, programs - specifically to help retrofit these buildings.

The process of implementing apartment building retrofits requires technical sustainability knowledge, an understanding of strata legislation, and the ability to engage, educate, and convince a large group of people to agree and invest their money.

This complexity creates a huge number of barriers to retrofitting apartments to improve thermal comfort, sustainability and efficiency. The three key areas that need to be addressed are:

- Navigating legislation and governance
- Technical sustainability advice and support
- Community building and communication guidance

The *Unlocking Sustainable Strata* report recommends the following 15 potential interventions that Merri-bek is currently exploring with partners:

- I. **Develop a Repository** - Developing and hosting a centralised, online repository of sustainable strata information, resources and case studies that is trusted, maintained and updated over the long-term
- II. **Document Case Studies** - Stories and case studies will be needed to build the confidence of committees and owners corporations to invest in retrofits.
- III. **Guides and Proformas** - As momentum grows behind sustainability retrofits in apartments, there will be opportunities to produce and maintain proformas and guides to short-cut the research owners corporation committees generally need to undertake. For example, guidance on how a committee can inform and campaign to their owners corporation about a major retrofit decision that is going to a ballot.
- IV. **Education and Events** - Apartment owners, particularly committee members or those retrofitting their own homes, will benefit from connecting with and learning from each other, suppliers and experts.

- V. **Electrification Research** - Owners corporations need information so they can financially plan for electrification costs.
- VI. **Climate Resilience** - Develop a deeper understanding and awareness of climate resilience and adaptation needs in the apartment context. Apartment residents are particularly exposed to heat stress.
- VII. **Retrofitting Action Research** - Action research to track and understand how retrofitting occurs in the apartment context, and what additional supports are needed to accelerate the process. Due to the lack of ongoing programs for apartment owners and committees, there is a knowledge gap as to the process to drive sustainability retrofits, including the duration it takes to make and implement decisions
- VIII. **Community Connection** - Alongside technical sustainability information, owners corporation committees need advice and resources to help them connect their community (this includes those living on-site and rental provider owners), and make good decisions together.
- IX. **Mentorship Program** - A mentorship program could support representatives from owners corporations through the retrofit process, bringing in guest experts to walk them through all the different elements of the change process.
- X. **Strata Sustainability Fund** - Develop packages so that existing state sustainability funding eg. Rooftop solar and electric vehicle charging, is accessible and explicitly offered to apartments and townhouse complexes governed under the Owners Corporation Act.
- XI. **A Partnership Approach** - A partnership approach that includes SCA (Vic), State and local governments could efficiently deliver a program which leverages the particular strengths, resources and communication channels of the different stakeholders to maximise impact.
- XII. **Re-Engage and Support FMA** - Re-engage Facilities Management Australia to ensure FMs are increasingly upskilled in terms of sustainability. Update the Good Practice Facilities Management Guide and associated training.
- XIII. **Educate Maintenance Plan Consultants** - Education for consultants engaged to develop Maintenance Plans for new buildings to ensure they are specifying efficient all-electric technologies at the end of life of current infrastructure.
- XIV. **Educate the Sustainability Sector — Consultants and Suppliers** - Opportunities for the sustainability sector to better understand the opportunities and challenges of working with owners corporations. If demand for sustainability services in apartments increases, sustainability consultants and technology providers need to be equipped to deliver.
- XV. **Embedded Network Legislation** - Through the second phase of the Embedded Network Review, ensure the General Exemption Order makes it easy for existing buildings with embedded networks to access renewable energy at competitive rates.

For more Information see Appendix 1. Unlocking Sustainable Strata Barriers and Opportunities.

Residential - Apartments Recommendations

25. Develop and resource specific interventions for apartments that build on the knowledge and experiences of strata peak bodies, sustainability strata organisations and local councils.

2.3 Commercial

The types of development that are most frequent within Merri-bek are categorised as Class 1 (domestic residential – attached houses, such as townhouses and dual occupancies) and Class 2 (domestic apartment) development. Class 7 and 8 (warehouse storage and industrial facilities) and Class 5 and 6 (office and retail), whilst present within the City of Merri-bek, are less common when an application for development is lodged before Council.

Our feedback on commercial buildings is focussed on Council buildings.

- **Supporting Local Councils switch to electrification**

Although Council has reduced its overall carbon emissions by 70% since 2010/11, gas consumption currently contributes to around 30% of our (remaining) corporate carbon footprint. Merri-bek is committed to ensuring all our buildings are electric-only and is taking advantage of scheduled work to transition all our sites off gas. We consider that electric heat pumps (for provision of domestic hot water, and heating water) are capable of meeting the necessary heat demand at the vast majority of our Council facilities. We have installed electric heat pumps at six sports pavilions, two community centres and our main administrative offices.

Our current focus is our four heated aquatic centres, which account for 89% of our gas consumption. We are currently investing in a \$37 million major redevelopment of our Fawkner Aquatic Centre - this will be the first all-electric aquatic centre in Merri-bek. Electrification of aquatic centres is both relatively new, and expensive in comparison to a typical gas-fired boiler. The key barriers to heat pumps for aquatic centres are the extra plant room required, heritage restrictions, and the need to upgrade electrical infrastructure to deal with higher electricity demand. The last varies and is hard to estimate, but distributors can charge up to \$350,000 to upgrade local sub-stations. As first movers of switching from gas to all-electric, Council pays for the upfront costs for distribution upgrades. Modelling suggests that all-electric aquatic centres are marginally cheaper to run than gas-powered centres. As a result, the payback period is greater than 15 years. The up-front investment to ensure that an aquatic centre is all-electric is estimated from \$1-4 million. Merri-bek is committed to moving all its sites off gas, noting that with budget constraints this may take some time to achieve.

- **Supporting Local Councils to build energy-efficient, renewable and climate resilient community facilities.**

In early 2022 we opened our new Glenroy Community Hub, Australia's first passive house public building. It also achieves Living Building Challenge Petal certification. The airtight and thermally-efficient building envelope has largely eliminated heating and cooling bills and keeps the building comfortable year-round. As a net positive energy building, the hub generates more energy than it consumes. 125% of energy needs are met via solar PV and storage

Glenroy Community Hub is centred around the new contemporary public library, with co-located kindergarten, maternal child health, prayer and meditation rooms, a community health provider, neighbourhood learning centre and childcare.

The Hub demonstrates Merri-bek Council's community and sustainability leadership and is part of Council's action on climate change. Council invested in a public building that will benefit its immediate community and become a demonstration project for other councils and public institutions.

Commercial Recommendations:

- 26.** Provide funding to local councils to remove gas from sites with high consumption such as aquatic centres;
- 27.** Provide minimum performance standards for heat pumps to enable easy and standardised assessment of the performance of heat pumps;
- 28.** Encourage DNSPs to make the process of upgrading sub-stations more transparent and less costly for first-movers who transition sites from gas to all-electric;
- 29.** Incentivise DNSPs to invest in network augmentation - knowing that buildings will eventually transition off gas, to all electric;
- 30.** Provide modelling on future gas prices to assist Councils in making informed decisions on capital investments to enable electrification;
- 31.** Require timely disclosure of aggregated real time data from electricity distribution businesses; and
- 32.** Invest in energy efficiency in existing buildings and homes. It is a "no regrets" measure that reduces demand for heating, reduces bills and improves comfort.

2.5 Supply chains and workforce

To improve the energy performance of new builds and retrofit existing homes we need an educated and qualified workforce. This is to ensure that residents and businesses are receiving the right advice on best options to reduce energy bills and emissions and does not lock building owners into redundant and old technologies such as gas appliances. The roll-out of local government energy efficiency and electrification programs are at risk without suitably trained plumbers, electricians and builders.

Supply Chains and Workforce Recommendations:

33. Provide education training for plumbers, electricians, builders, architects, building designers and other building professionals, who provide advice to consumers. This initiative should specifically include training for plumbers and electricians in the installation of technologies such as heat pumps, draught proofing and insulation to reduce gas demand and improve thermal comfort.

Conclusion

We congratulate the Australian Government in taking action for an equitable, resilient and zero carbon future. We look forward to working with the Australian Government in the implementation of the strategy.

Should you require further information please contact either Joseph Tabacco, Director Place and Environment on jtabacco@merri-bek.vic.gov.au or Victoria Hart, Branch Manager Sustainability and Climate vhart@merri-bek.vic.gov.au.

Your sincerely



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