

Project: **Ballarat  
North**

ID	Q1. Your name	Q2. Your email	Q3. Your postal address	Q4. You can enter your submission	Q5. You can upload your submission	Date
1406102				See attached.	<a href="https://engage.vic.gov.au/dash/project/1771/submission/survey/1406102/attachment/dxbsb2fkojiwmjutmdkmtzumdu6mtq6ndmundu1wg-0-2025-10-20-exhibition-submission- -sent.pdf/download">https://engage.vic.gov.au/dash/project/1771/submission/survey/1406102/attachment/dxbsb2fkojiwmjutmdkmtzumdu6mtq6ndmundu1wg-0-2025-10-20-exhibition-submission- -sent.pdf/download</a>	2025-10-20 13:44:11

[REDACTED]

20 October 2025

**Attn:** Amendment C256bal Project Manager  
**The Victorian Planning Authority**

[REDACTED]

**Submission Regarding Draft Ballarat North PSP and DCP (Amendment C256bal)**

Dear Sir/Madam,

I make this formal response to the exhibition of Amendment C256bal, the draft Ballarat North Precinct Structure Plan (PSP) and Development Contributions Plan (DCP), on behalf of [REDACTED], the landowner for the land at:

- [REDACTED]
- [REDACTED]

The technical review has identified several fundamental flaws within the draft PSP and DCP that, if not rectified, will severely compromise the commercial viability, delivery feasibility, and timely investment required to unlock housing supply within the Ballarat region.

The core issues detailed in this submission are not matters of preference but represent critical impediments to responsible development.

**Key Development Viability Impediments**

We object to the Amendment as currently drafted on the following five primary grounds:

**1. Unsustainable Net Developable Area (NDA)**

The PSP specifies an NDA of **47.9%**, a figure that is inconsistent with the expected viability benchmarks for regional PSPs (Ballarat West achieved 74%). The low NDA is driven by:

- **Overly Conservative Drainage Reserves:** The current drainage asset footprint is excessive and not supported by contemporary engineering best practice.

- **Unjustified Biodiversity Wetlands:** The classification of our land as containing a **Seasonal Herbaceous Wetland (SHW)** is contested by our experts and results in unnecessary land sterilisation. This land has been extensively farmed for generations.

The fixed costs for infrastructure recovery across such a small proportion of the land make the project economically unfeasible and cannot support affordable housing delivery.

## **2. Restrictive and Unjustified Staging**

The deferral of all landholdings to a **future Stage 2** without a clear, defined mechanism for acceleration creates unacceptable planning uncertainty and effectively sterilises our land from immediate market competition.

Transport analysis confirms that the existing external road network has sufficient capacity to support the development of our land now. As it currently stands, this is an unjustified and detrimental to the precinct's overall activation timeline.

## **3. Unsupportable High Development Contributions Plan (DCP) Rate**

The DCP rate of **\$672,901** per NDA/ha is unviable for a regional market such as Ballarat. The calculation contains flaws, most notably the inclusion of the Midland Highway Duplication (RD-02-1) as a fundable item.

The duplication of a State Principal Road Network asset is a State Government responsibility, and its inclusion in the DCP constitutes an unjust financial burden on local landowners. This item must be removed from the DCP schedule.

## **4. Financial and Planning Failure to Integrate the Expansion Area**

The PSP defines the 'Expansion Area' but fails to formally rezone this land into the Urban Growth Zone (UGZ). It creates uncertainty around timing and future use. The current framework plan does not do nearly enough to secure that land's future.

This failure creates an inequitable burden on the Core Area (including our land) for schools and community facilities such as ovals and makes the core area financially responsible for funding strategic road infrastructure that will disproportionately benefit the un-zoned Expansion Area in the future. This undermines the principle of “fair and reasonable” contributions.

As it stands, it is also a waste of time and money to do all the work and not get a usable outcome for the expanded land. It's a missed opportunity to integrate the future miners rest to the existing area.

## **5. Mandatory and Unjustified Affordable Housing Target**

The PSP mandates a 13% affordable housing target (11% social, 2% subsidised), to be implemented via a compulsory Section 173 Agreement in the UGZ schedule.

This high target lacks strategic justification for the Ballarat region. Furthermore, the mandatory implementation via a Section 173 requirement in the UGZ is inconsistent with the voluntary nature of such agreements and imposes a critical threat to the commercial feasibility of the project.

## Requested Outcome and Resolution

Based on the technical deficiencies identified, we formally request the following revisions to Amendment C256bal:

1. **PSP & DCP:** Undertake an immediate, independent technical review of the Net Developable Area (NDA) calculation, specifically concerning the drainage reserves and the Seasonal Herbaceous Wetland (SHW) designation, with the objective of **increasing the NDA to at least 70%.**
2. **PSP:** Revise the Staging Plan to incorporate our landholdings into **Stage 1**
3. **DCP: Remove the Midland Highway Duplication (RD-02-1)** from the Development Contributions Plan and recalculate the rate accordingly.
4. **PSP:** Remove the mandatory **13% Affordable Housing Target** and its associated Section 173 Agreement requirement from the UGZ schedule.
5. **PSP:** Immediately undertake the necessary steps to **formally incorporate the defined Expansion Area** into the planning scheme to ensure equitable future infrastructure funding.

We are committed to resolving these issues and are available to meet with the VPA and its technical advisors immediately to discuss the evidence provided by our expert consultants.

Yours sincerely,

\_\_\_\_\_  




