

Project: **Ballarat
North**

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20 October 2025

**Victoria Planning Authority
GPO Box 2392
Melbourne Victoria 3001**

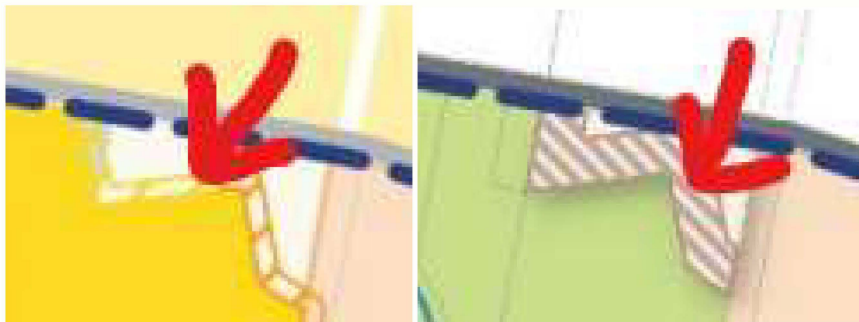
Re. Ballarat north Precinct Structure Plan

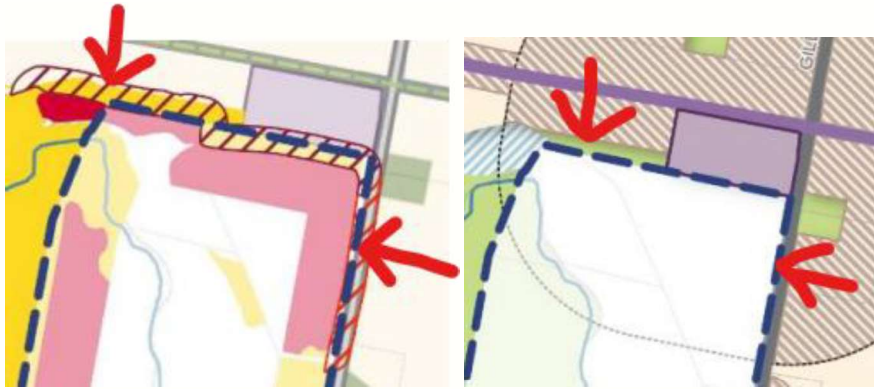
Dear [REDACTED],

We thank you for the opportunity to provide feedback on the draft amendment (C256ball) including the Ballarat North Precinct Structure Plan (BNPSP) and Developer Contributions Plan (BNDCP). Being local and given Integra's wealth of experience delivering communities in Ballarat, Integra is well placed to provide meaningful feedback to the draft amendment.

We have the following comments and queries regarding the **design and documentation of the BNPSP**.

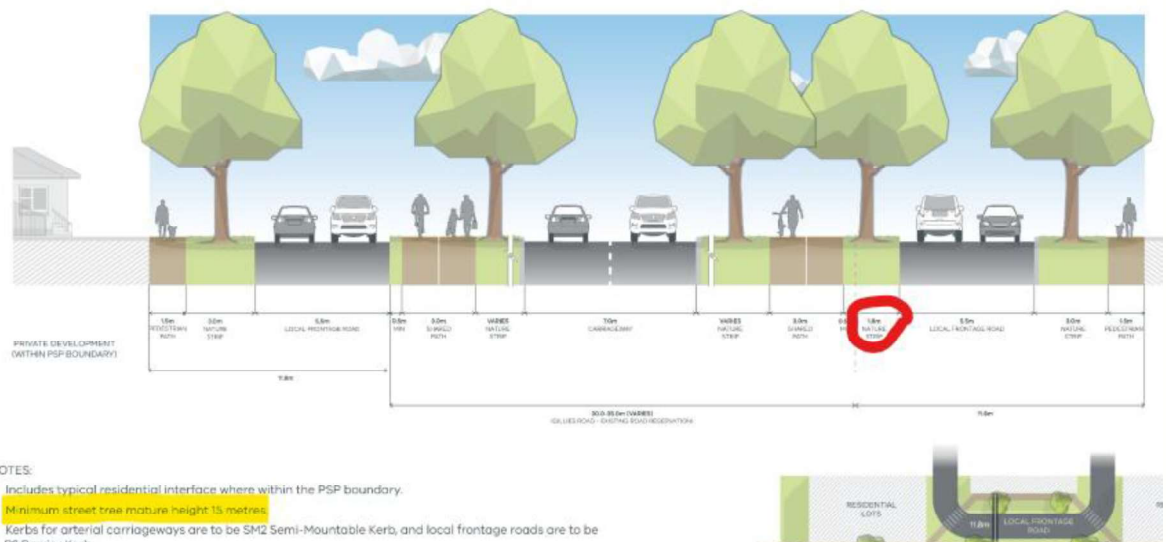
1. Explain further the possible future impact of Ballarat Airport noise contours.
2. Protect employment created by existing industrial developments such as Haymes Paint, McCains, Western Victoria Asphalt (or future businesses within zoned industrial land) by ensuring that sensitive uses proposed within buffers do not lead to future pressure for those employers to reduce or relocate their businesses (refer discussion of Mitigation Measures / Land Use Controls, GHD2024, P92). Of particular concern is the GHD statement to 'undertake a staged development approach (via a staging plan) ... - so that sensitive uses are not developed within separation distance areas until the industry adequately reduces the off-site impacts or provides information pertaining to transitioning out of the area' (GHD 2024, P92).
3. Ensure consistency between the BNPSP tree canopy coverage target of 30% (Requirement R10; Guideline G10 & G16) and the City of Ballarat (CoB) target of 40% (Urban Forest Action Plan 2019).
4. Clarify and rectify 800m catchment boundary to 'sports reserves or open spaces >1Ha' on Plan 5.
5. Confirm that the bushfire setbacks (Plan 7) have been accounted for in the NDA (Plan 2 & 3) in particular any setback from the BNWRP along Gillies Street and setback to Burrumbeet Creek corridor vegetation. Refer figures below.





6. Confirm 800m 'community infrastructure catchment - health facility' on Plan 8.
7. Confirm that CHW will provide recycled water connections to lots and open spaces within the BNPS (refer Requirement R30 & R31, P38).
8. Confirm that City of Ballarat would now accept "park furniture" such as barbecues, skate parks with 'associated amenities' in local open spaces (refer Requirement R31, P38). Previously facilities such as barbecues and skate parks have not been acceptable in local (neighbourhood) parks.
9. Confirm that the CoB supports street trees of minimum height of 15m appropriate in a 1.8m wide nature strip - Gillies Road cross-section (appendix 5 P66)? Would trees of this stature have access to enough deep soil volume without impacting adjacent pavements?

Secondary Arterial 60kmh - 2 Lane - Gillies Road (existing 30-35m reservation)



10. Confirm CHW and CoB acceptance of recommended IWM interventions including recycled water to homes and precinct-scale stormwater harvesting for open space irrigation.
11. Consider relocating the main NAC to be more central to a neighbourhood catchment (rather than being adjacent to the BNWRP) to unlock the efficiencies of higher-density development and non-private vehicle access to the NAC facilities and services. The current proposed location limits access without crossing Gillies Road (arterial) or Sims Road (connector).

12. Consider relocation of SR-02 (sports reserve & pavilion) to flatter land such as further south near Olliers Road to reduce costs and implications for significant earthworks. Consider co-location with the proposed P-6 government school. This location may allow earlier provision of this infrastructure.
13. Consider relocation of WL-04 (SEN) to a lower part of the site.
14. Consider mandating the provision of affordable, social or subsidised housing in the BNPSP given the Ballarat North Background Report (VPA 2025) acknowledges that PSP Target T4 (affordable housing) 'may be achievable by: subdivision with varied lot sizes; use of the Small Lot Housing Code; and subsequent permits which may be issued' (BNBR, P34).
15. Consider the costs to the City of Ballarat (or others) of the required upgrades of the 'downstream' roads that connect the BNPSP to Ballarat including Gillies Street and Midland Highway (refer Strategic Transport Modelling Assessment report, Jacobs, 2025).
 - a. The BLR-VITM assumes duplication of the Midland Highway (4 lanes divided) from Howitt Street to the north side of the Western Freeway interchange but the BNPSP is silent on when this will be completed and who would pay for this upgrade.
 - b. The model seems to suggest the Gillies Street is not further upgraded (showing 1 lane in either direction south of the Western Freeway).
 - c. There is no commentary on the implications for the extra traffic created by the BNPSP on existing intersections along Gillies Street at Grevillea Parade, Norma Street or Howitt Street / Ballarat-Ararat Railway intersection.



Figure 3.3: 2051 Core + Expanded, road network number of lanes

16. Confirm that the cost of the partly-funded or excluded infrastructure projects within the BNDP (apportioned 50% or 100% to the City of Ballarat) are borne ultimately by the ratepayers including the following projects.
 - a. Urbanisation of Gillies Road north of Sims Road (RD-01-3)?
 - b. Upgrades to Cummins Road including Burrumbeet Creek bridge and intersection of Gillies & Cummins roads (IN-03) & Howe Street & Cummins Road intersection (IN-06) associated, we assume, with future development of the Expanded Area even though the BNPSP seems to trigger the required upgrades.



Road	RD-01-3	Urbanisation of Gillies Road (North of Sims Road)	Road) Land and construction of Gillies Road (North of Sims Road)	City of Ballarat	No	No	No	Long	External (expanded area)	0%
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- c. Bridges (active transport) across Burrumbeet Creek (BR-02) and Western Freeway (BR-03) are excluded from the DCP.

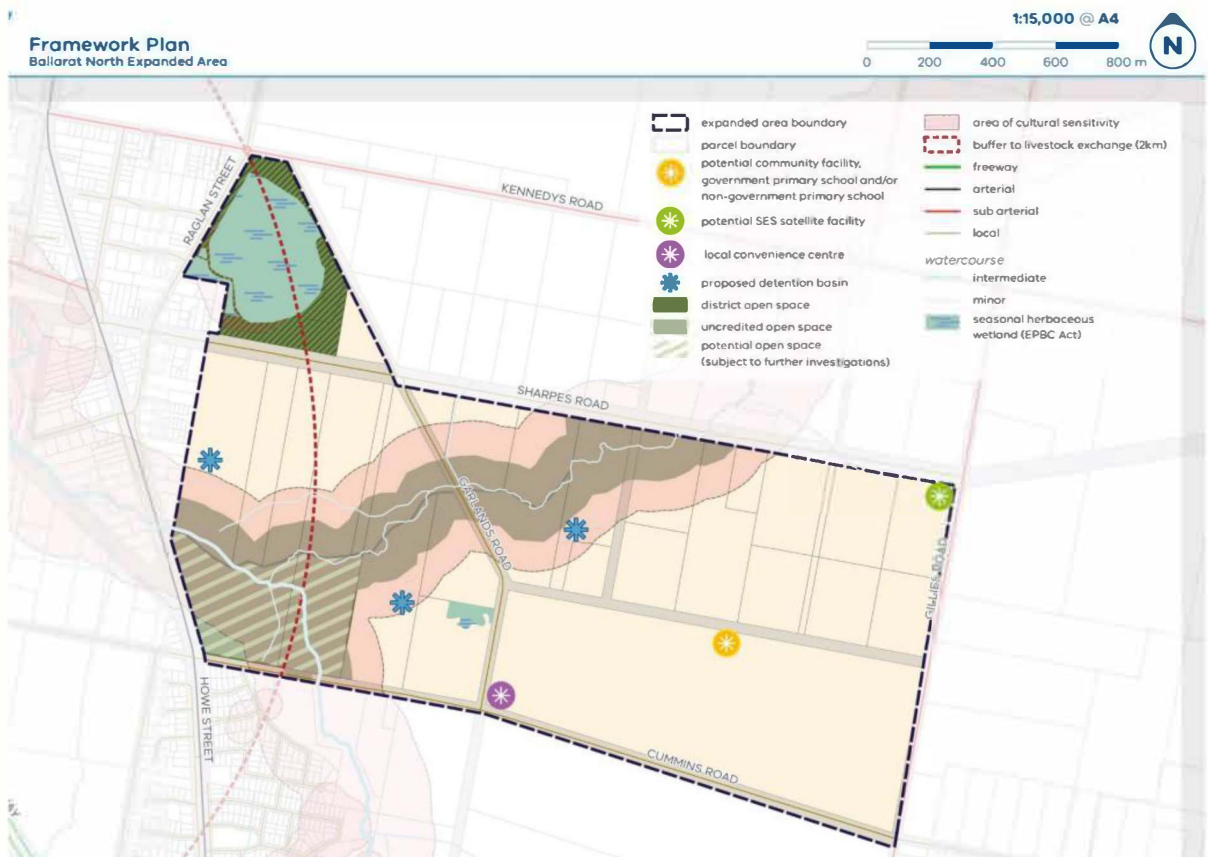
We note the following **implications of the BNPSP & BNDCP** for Ballarat.

17. The following is noted regarding the BNPSP and associated BNDCP.
 - a. NDA is 48% of GDA.
 - b. BNDCP contribution (\$672K / NDHa) is **60% higher** than proposed Ballarat West DCP review (Amendment C234ball) (which is currently proposed to be \$422K / NDHa).
 - c. BNDCP funding gap (cost to City of Ballarat) is \$45m excluding any non-DCP funded projects although this excludes projects that are not considered by the BNDCP such as Western Freeway overpass upgrades, Gillies Street & Midland Highway upgrades, active-transport bridge crossings of Burrumbeet Creek and the Western Freeway (at Forest Street).
18. The Strategic Transport Modelling Assessment Report (Jacobs 2025 v002) assumes that a number of road upgrades between the BNPSP area and Ballarat would have been completed including the duplication of the Midland Highway from Howitt Street to the Western Freeway. There is no mention of assumed upgrades to Gillies Street between the BNPSP and Howitt Street including implications for increased traffic at the Grevillea Road, Norman Street, Howitt Street and Ballarat-Ararat Railway Line. Without these upgrades, the liveability of Ballarat would be severely affected.
19. BNPSP staging prioritises the more heavily constrained land-ownership area adjacent to the Western Freeway **reducing its ability to bring consistent volumes of housing to the market to meet Ballarat's housing supply targets**. The BNPSP Stage 1 area is affected by the following (as shown on the image below).
 - a. Fractured land ownership.
 - b. A large parcel owned by Ballarat Grammar School.
 - c. Land proposed for residential use impacted by sensitive use buffers associated with the former landfill, Western Freeway and existing industrial areas requiring staged development outside of the buffers until the industry reduces its off-site impacts or moves away from the site (GHD 2024, P92).

- d. Land affected by environmental constraints including large parcels containing high or medium potential for contamination.



20. These “development constraints” along with 60% higher DCP rates, will further increase the costs of development and likely ability to bring BNPSP stage 1 lots to the market in a timely and consistent way.
21. **The proposed DCP and development constraints will deteriorate housing affordability in Ballarat.**
22. We note the Expanded Area Framework Plan (BNPSP Appendix 6, P69) and the City of Ballarat desire to develop this area subsequent to the BNPSP at the exclusion of any other growth areas in Ballarat (except for what is remaining in the Ballarat West PSP at that time).
 - a. This area was not considered as a new growth area in Ballarat in any of the growth area planning since the delivery of the Ballarat West PSP and as such there has never been a Council review process regarding or community consultation of this area.
 - b. When will the background technical studies be completed to allow community input into the development of this area?
 - c. Given the highlighted constraints, what is the likely yield of the Expanded Area? How many years of greenfield supply does that provide?



We commend the work done by the VPA so far on the PSP and DCP. We respectfully suggest that the BNPSP area, given the development constraints and costs, is unlikely to provide a sufficient rate of supply of housing to offset the declining rate of supply in the Ballarat West PSP and Alfredton West PSP. We remain concerned that given the state of the Ballarat North PSP and immaturity of the infill market, Ballarat remains unlikely to achieve the Housing Targets within a reasonable timeframe or affordability.

Yours sincerely,

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