

1 December 2025

Victorian Planning Authority
C/- Harwood Andrews Lawyers
70 Gheringhap Street
GEELONG VIC 3220

Dear Sir / Madam,

**VICTORIAN PLANNING AUTHORITY – BENDIGO REGIONAL EMPLOYMENT PRECINCT
RETROSPECTIVE PROBITY REVIEW**

Aster Advisory (Aster) was engaged in November 2025 by Harwood Andrews on behalf of the Victorian Planning Authority (VPA) to undertake a retrospective probity review of the planning process followed for the Bendigo Regional Employment Precinct (BREP) project.

Background and Context

The VPA, a statutory authority within the Department of Transport and Planning (DTP) that reports to the Minister for Planning, undertakes strategic planning for the future growth of Victorian cities and regions. This includes delivering place-based plans that provide zoned permit-ready land to enable housing and jobs creation. The VPA was appointed by the Minister for Planning as the Planning Authority for BREP in February 2022.

The draft planning scheme amendment (PSA) is presently being finalised for approval to release for public consultation by the Minister for Planning. In the course of their work, VPA identified a probity risk for the BREP associated with the City of Greater Bendigo (CoGB) dual role as landowner and municipal authority. As a result, the Project Charter and Governance Plan (Probity Plan) was initiated to manage the risk and mitigate any possible impact on the independence of the planning process. A copy of the Probity Plan is available on VPA website.

In acknowledging from the outset an inherent need for an independent process, VPA engaged a probity adviser in 2022 to support the development of the Probity Plan to protect the integrity of the process (including key probity requirements of security and confidentiality, identifying and resolving conflicts of interest, acting with integrity). The implementation of protocols considered under the Probity Plan, that have been agreed between the parties, supports the independence of the process followed.

This Report relates to the retrospective probity review undertaken by us prior to release of the draft Planning Scheme Amendment for public consultation in accordance with our scope of services (outlined later in this Report).

Overview of Process

Set out below is a high level overview of key activities undertaken (noting some may have been

undertaken concurrently).

- Appointment of VPA as the Planning Authority for BREP in February 2022,
- Establishment of governance structure and development of Project Charter and Governance Plan (Probity Plan),
- Engagement of independent expert contractors to undertake required technical studies,
- Engagement with key stakeholders (including direct engagement, Vision and Purpose workshops, Pitching Sessions, Stakeholder interviews),
- Agency conducted projects undertaken (including Department of Transport and Planning (Transport division) Marong Western Freight Corridor, Development Victoria Infrastructure Strategy, Coliban Water Integrated Water Management Strategy),
- Completion of independent studies and technical reports,
- Consideration of stakeholder feedback, studies, technical reports, government legislation, policies and guidelines,
- Drafting of Planning Scheme Amendment for approval for release for exhibition and public consultation.

Scope of Services

The focus of the review was to undertake a Health Check as referenced within the Probity Plan. Our services are limited to the review of documented tasks and activities completed during the process to date. Except for documents provided by VPA, we have not reviewed CoGB retained documentation.

Our scope of services has been a retrospective review, from a probity perspective, of copy process documentation provided by representatives of VPA and publicly available information as published on VPA website.

Our approach to completing this scope of services is outlined below.

Approach

A summary of the probity tasks and activities undertaken in relation to this Project includes:

- Review of (and/or reference to) documentation provided by VPA and its representatives;
- Review of procedures and documentation in relation to confidentiality and conflict of interest (COI) matters;
- Attendance at meetings, and discussions, with VPA representatives in respect to copy documentation;
- Review of emails and other correspondence including responses to Aster queries raised during the retrospective review.

There are inherent limitations in any probity review process. It is possible that irregularities may occur and not be identified as data is gathered at points in the process, rather than continuously

throughout the process.

In undertaking the retrospective probity review, we have relied on the documents provided and representations made in relation to the process by VPA and its representatives.

Statement of Responsibility and Disclaimer

VPA is responsible for the preparation, conduct and management of the activities associated with the process in accordance with applicable policies, guidelines, laws, and regulations. This responsibility includes designing, establishing, and maintaining processes and controls relevant to managing potential probity risks as contemplated in the Project Charter & Governance Plan.

Our responsibility is to assist VPA to identify, assess and manage probity risks related to the process such that compliance with relevant policies and guidelines is achieved in all material respects. Any matters raised in this Report are only those which came to our attention while performing our work and are not necessarily a comprehensive statement of all risks that exist or improvements that might be made.

The statement provided in this Report does not provide assurance as defined by the Australian Audit and Assurance Standards Board. We therefore have not expressed any form of audit or assurance opinion, and none should be inferred from any comments in the Report. We confirm we have not conducted a probity audit of the process and accordingly do not provide verification of compliance.

This Report has been prepared solely for VPA and we do not accept responsibility or liability for its use outside those terms. We understand this Report may be published on VPA website and we consent to this publication. In accordance with our normal practice, we hereby expressly disclaim liability to any persons other than VPA. This Report is not intended to validate or otherwise the planning process outcome. The information contained in this Report may not be used or relied upon by anyone other than VPA, in any manner whatsoever, without the prior written consent of Aster.

Probity Observations

Our role has been to review the information provided to us and to form a view as to whether the activities undertaken by VPA were developed, managed and completed in alignment with the principles underpinning the Probity Plan.

In our view, following completion of our scope of services, activities undertaken by VPA have been, in material respects, in accordance with the Probity Plan, associated documented procedures and probity requirements.

Yours Faithfully

ASTER ADVISORY PTY LTD

