

Our Ref: PAA 25887

10 February 2026

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Victorian Planning Authority  
Re: Bendigo Regional Employment Precinct

## Amendment C296gben – Bendigo Regional Employment Precinct

We welcome the opportunity to provide a submission on the Bendigo Regional Employment Precinct (BREP) draft ordinance and the revised Development Plan Overlay Schedule 34 (DPO34). We recognise the precinct will play a key role in addressing the region's industrial land shortfall and supporting long-term economic development.

Recent refinements by the Department of Transport and Planning (DTP), particularly the strengthened Integrated Water Management (IWM) assessment requirements and the designation of Coliban Water as a determining referral authority, represent important improvements that directly respond to the servicing realities of the site.

However, we want to ensure our position and role in supporting this development are considered and noted, which we have outlined below.

### Integrated Water Management (IWM) and servicing constraints for the site

We acknowledge and support DTP's inclusions that require:

- An Integrated Water Management Assessment, prepared with the relevant water authority, to demonstrate land use, development and servicing implications.
- Amendment to Clause 66.04, designating Coliban Water as the determining referral authority for any permit under DPO34.

These are necessary and appropriate changes, particularly with the following critical servicing constraints:

- BREP is limited to 2 ML/d for both water supply and sewer discharge under current and planned infrastructure.
- **This constraint restricts the precinct to low water-intensity tenants only**, in line with likely industry interest provided in the *BREP Industry Engagement Study (Mckinna: October 2024)*.

Servicing high-water-intensity industries would require significant developer-funded augmentation, which could include:

- A duplicate new trunk water main between Marong and Golden Square
- Additional water storage infrastructure
- A larger direct sewer connection to the Bendigo Water Reclamation Plant (WRP); and
- Developer contributions toward a second WRP.

It is critical to note that these further upgrades cannot be funded by our existing customer base. Any augmentation required to support water-intensive industries within BREP must be fully developer-funded to ensure current customers are not burdened with the cost of infrastructure built solely to service new industrial demand.

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Infrastructure such as a second Bendigo WRP represents a major capital project with a long lead time and significant regulatory, environmental and approval pathways that have not yet been realised. This includes planning, land, environmental assessment, EPA licensing and funding confirmation. The timing of this project is uncertain, and the planning framework must not assume the availability of this asset ahead of approvals and funding.

This underscores why an IWM assessment, prepared collaboratively with Coliban Water, is essential for guiding both land use planning and realistic servicing assumptions. These upgrades would substantially increase project costs and must be clearly understood by all stakeholders.

### **Staging must align with servicing dependencies**

Development sequencing should be explicitly tied to water and sewer infrastructure availability. Critical works, including potable water reticulation, storage, transfer mains, and a direct sewer connection to the Bendigo WRP, must be in place before higher-demand uses can be contemplated.

BREP remains in the early stages of planning and feasibility assessment. Many infrastructure cost, funding, and servicing risks have not yet been fully identified, scoped, or tested. As further studies progress, additional risk mitigations may be required. It is therefore essential that the planning framework retains flexibility to incorporate future governance, servicing, and infrastructure requirements as uncertainties are resolved and further risks emerge.

### **Planning controls must explicitly manage tenant water intensity**

Given the precinct's servicing cap, BREP requires enforceable mechanisms to ensure tenant uses remain within capacity. This will likely require:

- Title restrictions and/or Section 173 Agreements,
- Permit conditions referencing the IWM Assessment,
- Clear communication to market participants that BREP is intended for low water-intensity industries unless further augmentation is funded.

We will monitor the remaining servicing capacity, but it is essential that we are referred to early in the design process. Permit applications will be reviewed for consistency with the IWM Assessment, including demonstrating that cumulative water demand across the precinct remains within the 2 ML/d limit unless augmentation is funded.

### **DTP's revisions to DPO34 and Clause 66.04 are necessary and supported**

The following changes directly strengthen the planning framework:

- Mandatory Integrated Water Management (IWM) Assessment prepared with Coliban Water to test land use scenarios against servicing capacity.
- Coliban Water designated as a determining referral authority for permit applications under DPO34.

These reforms create critical governance safeguards to ensure development aligns with real servicing limits.

### **Strengthening clause 66.04 referral requirements**

Designating Coliban Water as a determining referral authority is an essential safeguard. To support this role, additional guidance should be included in either the ordinance or an accompanying document clarifying:

- Types of applications that must be referred,
- Assessment criteria (e.g., water demand modelling, sewer discharge, peak load analysis),
- How cumulative impacts across the precinct will be monitored.

This will ensure consistent decision-making and remove ambiguity for both developers and regulatory bodies.

### **Conclusion**

We support DTP's recent revisions, which significantly strengthen alignment between planning controls and servicing capacity. However, additional clarity and enforceable mechanisms remain essential to safeguard

infrastructure capacity, protect existing customers from undue cost burden, manage risk, and ensure development proceeds sustainably and sequentially.

With these additions, the planning framework will better support the successful and responsible development of this strategically significant precinct.

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