

Figure 1 – landownership map (extracted from the Background Report at page 13)

4. The City has not traditionally taken on the role of a developer. The land in BREP was purchased by the City to facilitate the development of industrial land to support the growth of local business and to attract new industry. For many years the City has heard from industry that industrial land in Greater Bendigo is scarce, and that where land is available this is often constrained in terms of access or being close to sensitive uses.
5. In preparing its *Greater Bendigo Industrial Land Development Strategy 2025 (GBILDS)*, the City's Strategic Planning unit comprehensively mapped available industrial land identifying only 100 hectares of available industrial land, less than 11 years supply. GBILDS identifies that there is the potential for over 1,000 jobs to be foregone by 2036 if a quarter of the remaining land in the municipality cannot be developed.
6. This anticipated shortage of industrial land within the City was also identified by Charter Keck Cramer in its *Bendigo Regional Employment Precinct Independent Development Assessment, August 2025*. The report found that Bendigo lacks land to sustain medium to long term industrial expansion, anticipating near exhaustion of industrial land supply options in the early 2030s. The report also noted that "There is a small and diminishing number of larger developable sites (greater than one-hectare) to sustain ongoing industrial development within Greater Bendigo" further noting that "As larger vacant industrial sites become increasingly scarce, industrial land development is anticipated to slow".
7. The BREP aligns with State and Local Planning policy by providing employment opportunities to a growing community. The *Marong Township Structure Plan June 2024* encourages greater housing density within Marong. The BREP will provide jobs within the precinct for the anticipated growth of Greater Bendigo.

City concerns

8. The City, as the largest landowner within the BREP, is generally supportive of the Amendment however it seeks clarification on the following aspects of the proposed BREP.

Rezoning of BREP to Industrial 1 Zone and required separation distances for public open space

9. The City supports the rezoning of land within the BREP from the Farming Zone to Industrial 1 Zone. This will create greater certainty for landowners, businesses, the community, and infrastructure agencies as to the future intent for development of the precinct.
10. By not providing restrictions on the range of lot sizes provided this will enable the BREP to be attractive to a variety of businesses of different sizes.
11. The WSP, *Bendigo Regional Employment Precinct, Land Capability Assessment (LCA) 2 April 2024*, considered, amongst other things, potential impact on sensitive land uses from on-site adverse amenity sources.
12. The LCA identified separation distances be maintained for current activities occurring on site, being the piggery operation and the WaterStore Poly Tanks Premises (Zone A) as detailed in Table 8.2.
13. The Background Report also addresses this issue noting that:

*Under EPA guidelines, separation distances apply to protect sensitive land uses, permissible under INIZ such as education centre, places of assembly, childcare, aged care, hospitals **and open space**. (emphasis added)*

These sources may therefore constrain staging and land allocation within parts of the BREP until they are decommissioned, relocated, or shown to comply with reduced off-site impacts. (page 82)
14. The Wilson Hill Nature Conservation Reserve adjoins the northwest corner of the proposed BREP. Vegetation retention is provided for along the Reserve's eastern boundary, and a drainage reserve is located along its southern boundary. A reserve is proposed centrally to the BREP.



Figure 2 – BREP Concept Plan

15. Given the extent of open space proposed throughout the site, and the EPA's recommendation of separation distances be provided for, amongst other things, open space, the City seeks clarification as to whether there is any need for a separation distance from industry to open space as outlined in the Background Paper. If it is found that a setback is required, guidance on the extent of setback would be appreciated.
16. The City wants to ensure there is adequate land available for more intensive industry to establish, particularly for industry which requires 500 metre buffer distances.

Recommendation

17. Clarify as to whether open space is a sensitive use as outlined in the Background Paper and if so, what, if any, should the required buffer distance be.

Development Plan Overlay, Schedule 34 (DPO34), Shared Infrastructure Plan and Development Plan

18. The City supports the application of Clause 43.04 Development Plan Overlay Schedule Bendigo Regional Employment Precinct (**DPO34**) as a means to coordinate development outcomes in the BREP. A DPO has the potential to create a more streamlined approach than a Precinct Structure Plan for the precinct.
19. The DPO schedule seeks, amongst other things, to secure infrastructure delivery and contributions through Section 173 Agreements, including obligations for shared local infrastructure and external State-managed transport projects, supported by a new background document under Clause 72.08 and policy guideline under Clause 11.03-6L-04 – *Bendigo Regional Precinct Guideline for Preparing Shared Infrastructure Plan for State Transport Infrastructure*.
20. The *Bendigo Regional Employment Precinct, Guideline for Preparing Shared Infrastructure Plan for State Transport Infrastructure, December 2025 (Infrastructure Plan)* recommends the shared infrastructure contributions of three State-managed transport intersections. Furthermore, the Infrastructure Plan inform the Shared Infrastructure Plan (**SIP**) required under DPO34.
21. The Infrastructure Plan notes:

This document provides the technical and policy basis for meeting the DPO schedule's requirement to identify and secure State infrastructure contributions associated with the Bendigo Regional Employment Precinct (BREP). It also supports the orderly and coordinated development of the BREP and adjoining growth areas, including the Marong Township Structure Plan Area.
22. The need for the preparation of a development plan for each precinct within the BREP (if not delivered by the City) may be challenging for the smaller landowners. In particular, the reports required to be prepared by each landowner to demonstrate adequate servicing, access, drainage and transport may be cost prohibitive.
23. The City as a landowner supports the application of a plan to manage contributions towards infrastructure within BREP.

24. The City in principle supports the idea of a simplified process over a Developer Contributions Plan given the costs and timeframe to establish. However, the City as the largest landowner has concerns as to how the Shared Infrastructure Plan (SIP) will practically work.
25. While there is an overall apportionment for the delivery of the key intersections for the BREP as a whole in the SIP, this has then not been apportioned for individual landowners in the *Bendigo Regional Employment Precinct Guideline for Preparing Shared Infrastructure Plan for State Transport Infrastructure*.
26. It is unclear as to how this apportionment will work and how this will be costed at DP stage if all landowners are preparing their own DP, or how this will be fairly apportioned if the first landowner ultimately prepares the SIP for the whole of BREP.
27. The calculation of a standard contribution rate(s) of each development plan area for transport infrastructure being determined and confirmed through a Transport Infrastructure Assessment has the potential to lead to underfunding of projects. Without undertaking this holistically it will be difficult to determine the cumulative impact of development across the BREP.
28. Outside of external transport infrastructure there is also a lack of clarification as to how other shared infrastructure will be funded and managed, especially drainage.
29. There are concerns in relation to if there is a funding shortfall within an SIP. The document indicates that this is a shared implementation risk on the developer that could be managed through developer contributions, works-in-kind arrangements and external funding sources. It is rarely this easy in practice to increase contribution rates or find other alternatives to fund infrastructure delivery. It is likely that being the largest and most visible landowner in the precinct that there would be an expectation for the City to ensure that infrastructure is delivered to attract new business which is not an equitable outcome.

Recommendation

30. To make contributions clearer, equally proportioned and to be able to practically be delivered in a timely manner standard contribution rates would be outlined per developable area within the precinct. This would include all local infrastructure within the precinct including drainage and roads.

Requirements for development plan

31. Some of the requirements within the development plan seem to be overly onerous given the number of technical reports already completed. For example, the number of requirements under the Transport Impact Assessment given the Transport Impact Assessments have already been prepared for the precinct overall.

Recommendation

32. Ensure all the requirements of the development plan are not currently considered within existing technical reports.

Protection of mature, significant vegetation to be retained as part of future development

33. The provision of interconnected open space links that support shade ways and the integration of open space is supported in principle and will further encourage the take up of active travel. There are concerns however about the impact this might have on more intensive uses if buffer distances are required from open space. Also, further detail will need to be worked through at the design stage to ensure that these will be able to be appropriately managed by the City.
34. The City is not supportive of the current buffer setback proposed for Marong Cemetery. It is unclear why such a large buffer of 50 metres is required. There doesn't appear to be any strategic justification for this particular distance, outlined within the consultation documents. Further, if no development is allowed in this setback and mature trees are required to a height of 12 metres to provide visual screening, it is not recommended that there should be a further restriction on built form to not exceed 10 metres beyond this.
35. There is a need to further clarify the various buffer extents and the scale of the open space reserves within the precinct. This will help not only in better understanding the developability of the precinct but also the maintenance burden on the City who will ultimately be responsible for maintaining these reserves.

Recommendation

36. Remove the buffer to the Marong Cemetery and instead reference the need for appropriate landscape and design treatment. This should reference the *Greater Bendigo Industrial Development Guidelines 2024* consistent with the earlier point in the proposed DPO34 of 'A design response detailing the layout, built form, and interface treatments consistent with the *Greater Bendigo Industrial Development Guidelines 2025*'.

37. Map 1 in DPO34 should provide a clearer scale, so the approximate dimensions of the various elements such as the proposed open space reserves and linkages located throughout the precinct can be calculated. Map 1 should also remove the reference to a buffer to the Marong Cemetery.
38. In addition to the above comments, the City recommends some specific wording changes within the DPO for greater clarity to inform the preparation of a Development Plan (DP).

Current wording	Proposed wording/recommended change	Reason for change
Includes interconnected open space links that support shade ways and integration with the open space network across the precinct.	Consider the integration of open space links that support shade ways across the precinct.	This can be worked through at the DP stage.
Alignment of the urban design layout to establish and protect view lines.	Specify from where.	This will make it clearer for developers and the community as to what is being considered.
Provision of adequate setbacks for new roads and buildings from existing mature vegetation on roadsides with indigenous species for front landscape planting.	Be clear on what the setback should be or how this should be calculated.	This will make it clearer for developers in preparing a DP.

Conclusion

39. Overall, the City as the largest landowner is supportive of the Amendment and the proposed planning controls as a first step to realising the BREP development. The recommendations as outlined in this submission are provided to help improve the clarity and timely delivery of the BREP to ensure the precinct meets industry growth needs both within Greater Bendigo and the region more broadly.