

Amendment C296gben: Bendigo Regional Employment Precinct

*YourLand Submission
Feb 2026*

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1 Introduction

YourLand have significant interest in Amendment C296gben (the amendment) and the long term implications associated with the proposed planned outcomes for the Bendigo Regional Employment Precinct (the BREP) on the future of Marong. We welcome the opportunity to make a submission to the amendment and hope to work with the VPA and other authorities to resolve the issues raised in this submission.

YourLand control approximately 175ha of land in the Marong Growth Areas including 62ha located in the northern half of the BREP. Figure 1 shows the extent of YourLand’s landholdings in the area.

We support the process of planning for new jobs in the Greater Bendigo municipality, and agree that there is a need to plan for industrial land supply across Greater Bendigo Local Government Area over the next 30 years.

YourLand have a track record of delivering high quality industrial developments in Bendigo including a substantial landholding in Bendigo East (Bendigo Brickworks now completed) and the Industrial Conveying Australia (ICA) site in Epsom. YourLand was responsible for the further subdivision of the ICA site and construction of a state-of-the-art sustainable warehousing facility for Vossloh which was opened by the Premier in April 2025.

YourLand approach this Amendment submission with extensive experience in master planning new communities in growth areas, delivering high quality residential developments and delivering and managing industrial developments across Victoria.

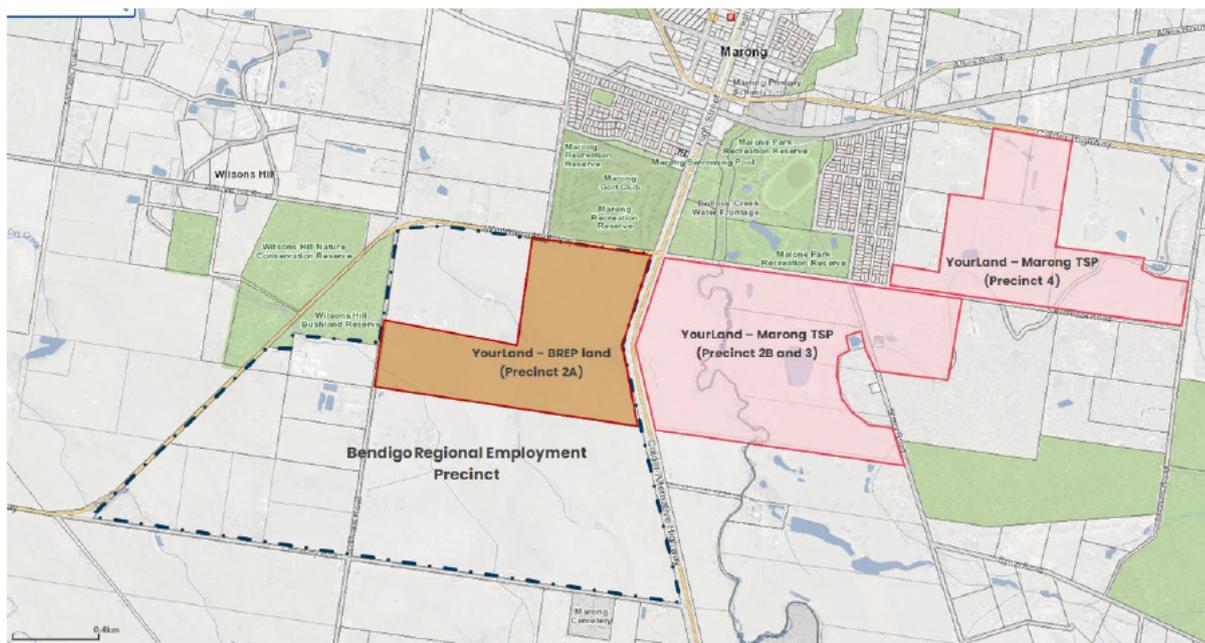


Figure 1: YourLand land holdings Marong Growth Areas and BREP

In this submission we raise the following key issues:

- The lack of transparency and strategic justification to use of Amendment C296 to incorporate the Marong Western Freight Corridor in the Greater Bendigo Planning Scheme.

- Lack of certainty in relation to the delivery of the Marong Western Freight Corridor and its role in supporting the BREP.
- The lack of regard to the impacts on the planned outcomes for the Marong residential growth areas and the staged and orderly development of the BREP.
- The extent of Industrial 1 Zone proposed results in a lack of nuance and consideration for planned future land uses sitting adjacent to BREP.
- The planning associated with the BREP fails to integrate with the Marong Township and Residential Growth Area.
- The BREP Concept Plan lacks sufficient detail for future outcomes associated with land to the north of the Council own area.
- The BREP drainage infrastructure must be strategically planned and funded to avoid piecemeal outcomes.
- The proposed development contributions arrangement is complex and uncertain.
- Lack of certainty in relation to servicing and infrastructure capability of the site to service industrial land in a feasible manner
- The proposed Planning Scheme Amendment does not implement the objectives of planning in Victoria as per the Requirements of the Planning and Environment Act 1987, Section 4(1) and does not propose to introduce provisions that apply fairly and transparently to all affected land owners.

In drawing together the concerns raised on the above topics, we provide comment on the proposed planning controls, including:

- Clause 02.03 Strategic directions
- Clause 11.01-1L Settlement – Marong
- Clause 11.03-6L-04 (Bendigo Regional Employment Precinct)
- Schedule 34 to Clause 43.04 (Development Plan Overlay), including the BREP Concept Plan
- Clause 72.08 – BREP Shared Infrastructure Plan

Each of the above issues is addressed in turn in the sections following.

2 Marong Western Freight Corridor

YourLand seeks to make submissions on the proposed alignment of the Marong Western Freight Corridor (MWFC), its status within the Amendment documentation, and whether the corridor is genuinely required to service the BREP or is intended to serve a broader strategic function. We also hold significant concerns regarding whether the MWFC will ever be delivered, how it would be funded, and the timeframe for its implementation.

The MWFC is an embedded element in the Planning Scheme Amendment and yet the details associated with the desired outcomes are significantly unresolved. If the MWFC is to be included as part of this amendment it must be examined and interrogated at any panel or SAC appointed to hear submissions.

The current proposed alignment will have far reaching implications for the orderly delivery of the BREP and for the safety, amenity, and character of the Marong township as planned through the Marong Township Structure Plan (MTSP). Given these implications, the alignment requires careful consideration and any decision to embed it in the planning scheme must be supported by clear, transparent, and comprehensive strategic justification.

YourLand's concerns regarding the MWFC are outlined in the sections below and relate to the following key matters:

- The proposed alignment of the MWFC and the lack of strategic justification supporting that alignment.
- Insufficient detail and supporting material regarding the purpose of the MWFC, resulting in uncertainty about its intended function and relationship to the BREP.
- The status and treatment of the MWFC within the Amendment documents, including its proposed incorporation into the Planning Scheme.
- Lack of clarity regarding land acquisition requirements and uncertainty about if, when, or how the MWFC will be delivered.
- Concerns about the independence, transparency, and robustness of the background work informing both the MWFC and the BREP.

While these issues are interrelated, they are addressed individually in the following sections to enable clear consideration of each matter. YourLand has also proposed an alternative strategy that we submit would more appropriately address these concerns and provide a more orderly, evidence based approach to planning for freight movements and industrial development in the Marong area.

2.1 The lack of strategic justification for the proposed MWFC alignment.

YourLand have significant concerns regarding the alignment of the planned MWFC as shown in the Amendment documentation. We submit that there is no meaningful strategic justification—either within this Amendment process or any preceding planning process—to support the alignment now proposed. Notwithstanding this absence of justification, the Amendment presents that the alignment as fixed, with no apparent flexibility to examine or consider alternative locations.

YourLand does not support an alignment that is poorly justified and positioned almost entirely within our landholdings in the BREP, particularly when Council—who are a major landowner within the precinct—is equally capable of accommodating or contributing to the delivery of the corridor.

DTP have confirmed via the MWFC Project website that determining a preferred alignment for *the Marong Western Freight Corridor* included consideration of findings from various technical studies, consultation with landowners, key stakeholders and government agencies, and a multi-criteria assessment.

Given that the Amendment seeks to confirm and embed the MWFC alignment into the planning scheme, all technical studies and the multi criteria assessment that informed this decision should be made available as part of the exhibited material.

The MWFC Project website also indicates that *while we identified option five as the preferred alignment, this is not a final decision. Based on the assessment undertaken, option five has the lowest impact on biodiversity, land acquisition and areas of cultural and historic heritage sensitivity.* We note that the letter provided to landowners in July 2025 that supported the Option 5 Alignment also indicated that the *preferred alignment provides greater traffic and heavy vehicle benefits.* This appears to have been omitted from the project website.

This inconsistency underscores the need for the full suite of supporting assessments to be publicly released to enable proper scrutiny of the conclusions drawn.

This assessment provides minimal detail explaining how its conclusions were reached. In our view, Option 5:

- **Does not demonstrate a genuinely lower biodiversity impact.** Its purported benefit arises only because it avoids using existing road reserves and instead proposes an entirely new road reservation adjacent to an existing road, where native vegetation currently constrains road widening. This rationale does not meaningfully demonstrate that Option 5 is superior on biodiversity grounds. Refer to Figure 2.
- **Minimises land acquisition.** This is only true in comparison to select alternatives. Despite being linked to the delivery of the BREP and supporting the justification for the area of land proposed for rezoning to Industrial 1 Zone, the Option 5 alignment fails to capitalise on the opportunity for a new road to be constructed as part of the BREP to service the precinct in the short term and be widened in the future if necessary to accommodate freight movement. This alternative option proposed by YourLand would substantially reduce the total land ultimately required to be acquired by the State.
- **Does not credibly avoid cultural or historic heritage constraints.** Option 5 is the only alignment that encroaches on areas of Important Cultural Heritage Landscapes and Values, as identified in the new Mapping Platform for Strategic Planning. This calls into question whether it is in fact the most appropriate option. Refer to Figure 3.
- **Is the only option that directly passes a known post contact heritage site in the southern portion of the corridor.** It appears that the Heritage report forming part of the Amendment's supporting material did not identify HO943, likely because it was introduced through Amendment C263 and the Marong Township Structure Plan process and there has been an insufficient response to the MTSP through the preparation of the BREP. Refer to Figure 4.
- **Does not deliver greater traffic or heavy vehicle benefits.** The alignment of option 5 would result in the need to have heavy freight vehicles slow down significantly to navigate multiple roundabouts and 90 degree turns. Option 5 also channels heavy vehicles into substantially more residential traffic entering the Calder Alternative Highway roundabout—an outcome that could be avoided if the MWFC were to divert west, further south of the township.

It is our submission that for the MWFC to be introduced into the Greater Bendigo Planning Scheme in the way that it is proposed, the ability of the public to review and understand the detailed assessments that determined DTP's preferred alignment is fundamental to the ability to assess the merits of the proposed amendment. Without it, we have no way of knowing how or even if the assessment of options objectively followed the principles of proper and orderly planning and how the proposed options were considered as part of the proposed outcomes.

YourLand submit that given the expressed strategic importance of the MWFC to the BREP, and the VPA's desire to confirm the alignment as part of this Amendment, the alignment should be rigorously examined through this process to determine the most suitable location. It is our submission that a viable alternative alignment exists and better supports the objectives of the long term freight movement. Our preferred alignment as previously submitted:

- Achieves the stated objectives of long term freight movement
- Sets up the ability to enable the progressive establishment of an industrial land market in Marong
- Avoids unnecessary access restrictions to land identified both within the BREP and the Marong TSP, and
- Avoids the impacts on heritage, cultural heritage and biodiversity noted above.

On the other hand, if the MWFC is not demonstrably required (as demonstrated by the absence of a PAO and its lack of access to the BREP) to support the delivery and functioning of the precinct, then it should be removed from Amendment C296 and instead progressed through a separate, comprehensive and strategically robust assessment process.

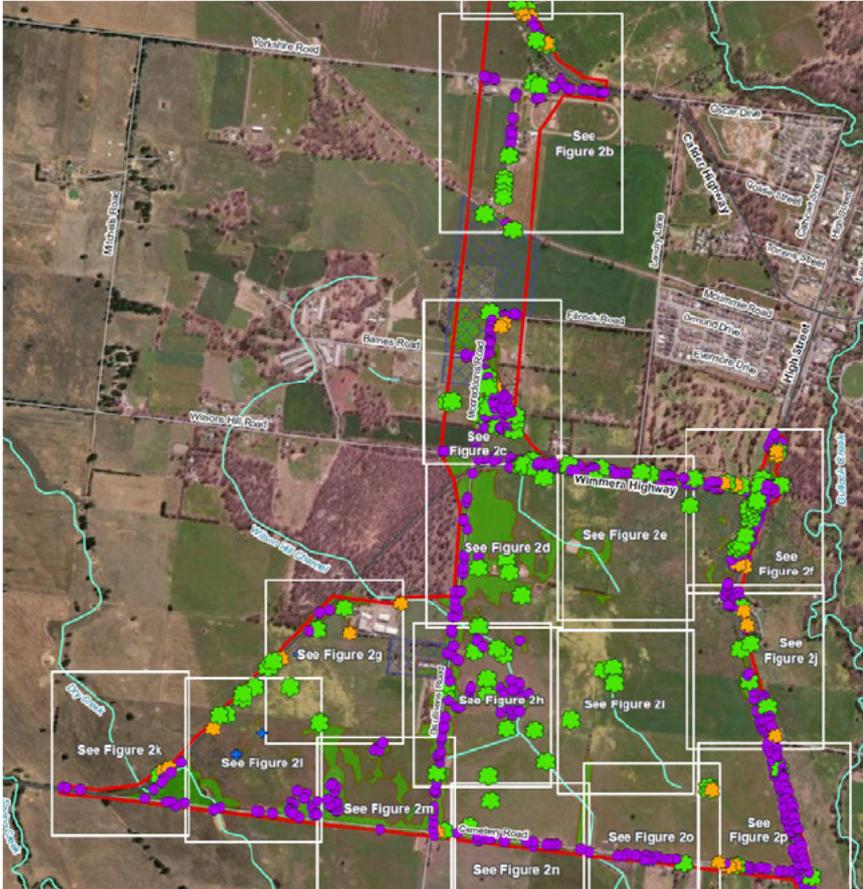


Figure 2. BREP Biodiversity Report (Ecology and Heritage Partners)

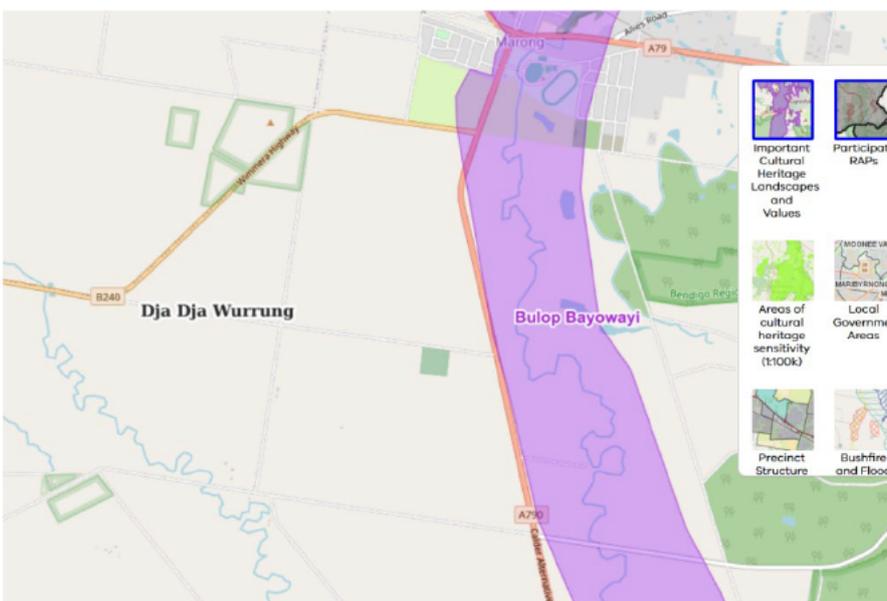


Figure 3. Important Cultural Heritage Landscapes and Values Map

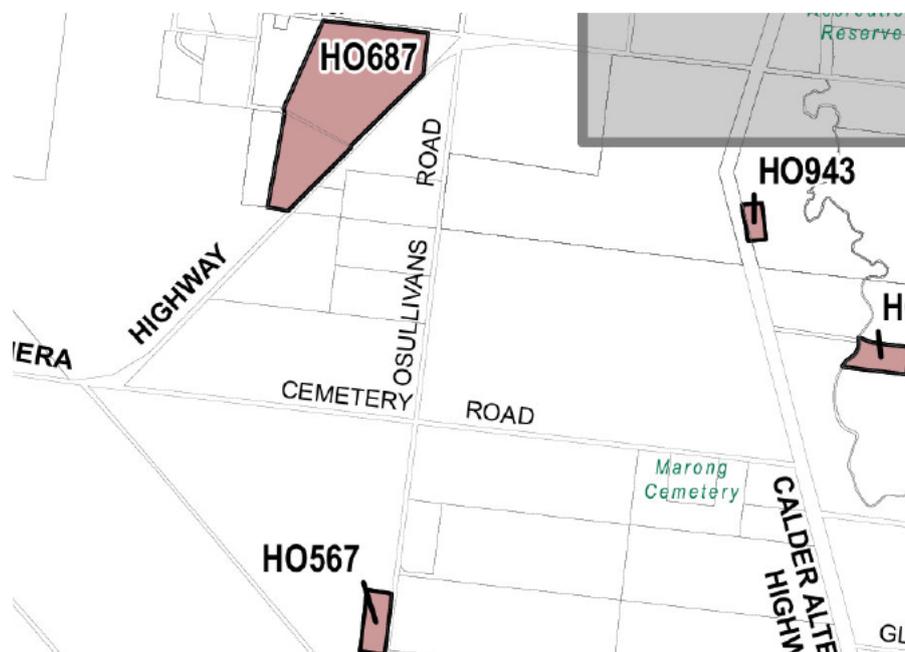


Figure 4. Heritage Overlay Map identifies HO943 on the eastern side of the Calder Alternative Hwy

2.2 Status in Amendment Material

The VPA's BREP Background Report states that the following:

...“the preferred alignment is now being incorporated into the proposed BREP planning framework. The planned MWFC’s protection within the proposed ordinance ensures coordinated access and long-term integration with the freight network. DTP-Transport Services will undertake a separate amendment and Environmental Effect Statement if required to deliver the planned route at a future point of time” (p. 43)

The BREP Background Report also states that:

*...“the freight corridor has been under investigation for several years, evolving from a strategic concept into a defined corridor alignment that now provides the **structural certainty** needed for integrated land use and infrastructure planning”. [emphasis added] (p. 42)*

Whilst Amendment C296gben is intended to facilitate the master planning of the BREP, the proposed Planning Policy Framework simultaneously introduces changes that would identify the specific alignment of the proposed MWFC despite there being no strategic justification for this change included in the exhibited Amendment material to explain the chosen alignment.

In the absence of a strong strategic basis for the chosen location and a formal opportunity to make submissions in relation to its alignment, YourLand does not support the MWFC being identified on the proposed BREP Concept Plan forming part of the draft DPO34. Do does it support the changes to the Marong Framework Plan at Clause 11.01-1L. If this is something that DTP and the VPA cannot or will not provide as part of the process of testing the Amendment, then references to the alignment of the MWFC should be removed from the BREP Concept Plan and the Marong Township Plan to allow these matters to be considered and determined via a future more rigorous separate amendment process.

Whilst Traffic and Transport reports have been prepared by Stantec to support the Amendment, none of these reports provide any detailed analysis to support or justify the proposed alignment of the freight corridor. This is concerning given that the corridor is now considered 'defined' and to provide 'structural certainty'.

The corridor location is depicted on a series of plans that are proposed to be adopted into the Planning Scheme as part of this Amendment (as shown below) including the proposed Marong Framework Plan at Clause 11.01-1L (see Figure 5) and the proposed Bendigo Regional Employment Precinct - Concept Plan at Clause 43.04 – Schedule 34 (see Figure 6). It is normal practice for the preparation of a Development Plan to refine the details and implement the outcomes subject to more detailed technical work. DPO schedules do not typically result in fixed outcomes which have not first been thoroughly tested (noting the above statements in the Background Report). However, the Amendment documents do not appear to apply any level of flexibility in relation to the alignment of the MWFC, therefore removing the ability to more appropriate and less impactful alignments.

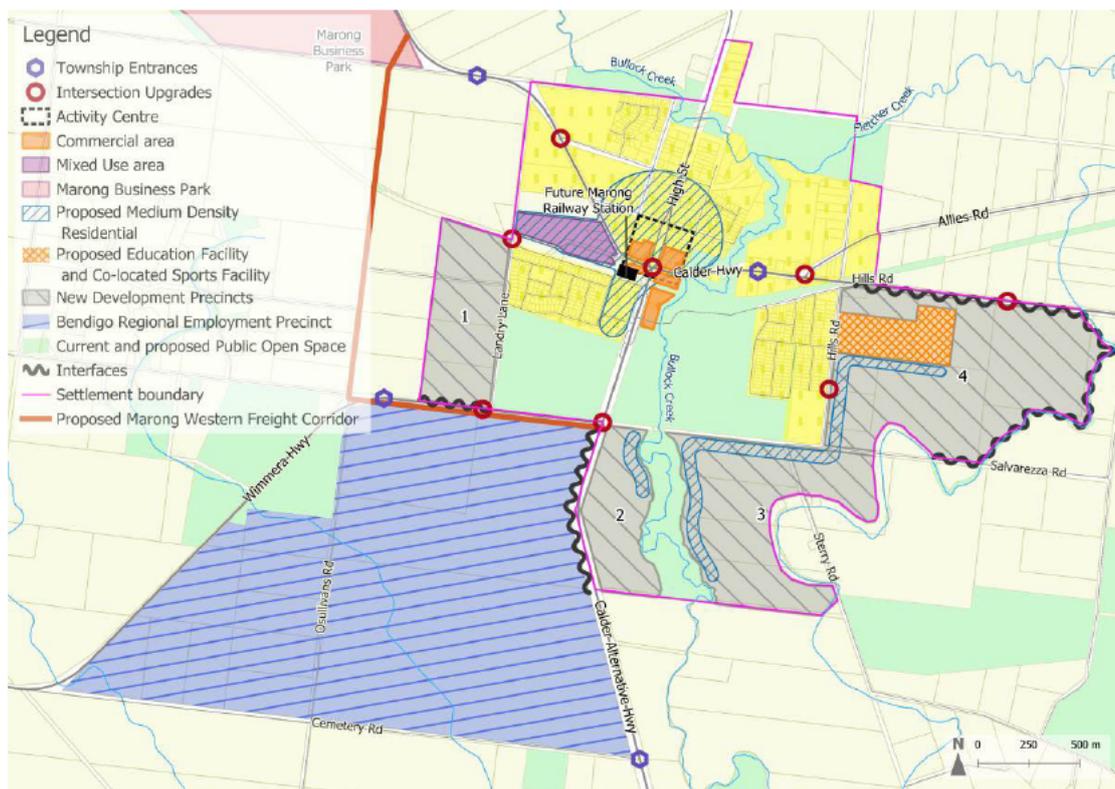


Figure 5. Proposed Marong Framework Plan – Clause 11.01-1L



Figure 6. Proposed BREP Concept Plan – Clause 43.04 – Schedule 34

2.3 The purpose of the MWFC and its role and function in the planned outcomes for the BREP

In order to evaluate and weigh up the strategic justification for the proposed planning scheme changes and to be able to make properly informed submissions in relation to whole of amendment C296 (which includes the MWFC), all of the information that was used to determine the outcomes of the amendment must be made available.

YourLand are seeking further detailed information in relation to the strategic basis for the freight route. YourLand have made numerous requests to DTP over the past 12 months to review the strategic justification for the MWFC and have been unsuccessful in obtaining any of the detailed analysis that has been prepared to inform the strategic basis of the MWFC or the preferred alignment. It is our understanding from the Amendment material that this work has been done and should be available. We submit that it is vital that it be made available through this Amendment process if the MWFC is proposed to be introduced into the planning scheme via this Amendment.

The BREP Background Report states, in relation to the work undertaken to inform the MWFC, that in 2023 *more detailed assessments were undertaken, with the corridor increasingly tied to the planning of BREP. Studies confirmed its importance for enabling regional freight efficiency and protecting Bendigo's long-term competitiveness.*

DTP have confirmed that *the freight corridor would service the future development of the Bendigo Regional Employment Precinct and seeks to provide connection from the Calder Alternative Highway and Calder Highway to the south and west of the Marong township.*

The proposed freight corridor aims to remove some heavy vehicle traffic from the town centre.

The BREP Background Report states that *the planning and delivery of the planned MWFC is **central to the long-term success of the BREP.***

It also states that ***the strategic success of the BREP relies on direct and efficient integration with the State freight network including the planned MWFC,** while minimising the traffic impacts on the Marong Township road network.*

Given that the MWFC is being introduced into the Planning Scheme at this stage and the successful delivery of the BREP is indicated as being dependent on the delivery of the MWFC, YourLand would like to review these detailed assessments as they are critical to understanding the justification and relationship of the BREP to the MWFC.

The Marong Township Structure Plan (MTSP) identified that freight traffic through Marong's town centre *has created an unpleasant and unsafe environment for those living in Marong (anecdotal/reported in the Structure Plan – note that traffic data indicates in the order of 18 – 20% of vehicles on Calder and Calder Alternative Highway are heavy vehicles).* The MTSP also stated:

- *DOT have completed work that has concluded that widening the highways through the centre of Marong is not feasible within the current road reserve. Note though that there appears to be scope to increase the traffic capacity at the Calder/Calder Alt. Hwy intersection within the existing reservation in the interim within the existing road reservation.*
- *DOT have identified the need to consider the development of western and northern alternative freight routes to be planned for to address the above issues.*
- *Cost associated with acquiring land and constructing a bypass.*
- *Timing of construction and interim impacts prior to the bypass completion.*
- *Environmental impacts, including vegetation removal to construct a bypass, location of drainage channels, etc.*
- *Managing and providing for access to abutting land.*
- *Management of interface between bypass and adjoining land uses.*

YourLand request to see the completed work that made these conclusions.

On 24/07/25 Urbis (on behalf of YourLand) requested DTP provide the traffic assessment and modelling that support the adoption of Option 5 for the MWFC. A response provided on 25/07/25 from DTP suggested that they are *'limited in what can be shared at this stage. More information will be made available through formal planning processes'*.

Through this submission YourLand request to see the information as outlined above. This will help guide the future resolution of its alignment and integration into the BREP process.

2.4 Lack of certainty in relation to the acquisition of the land and the delivery of the MWFC

Despite the Amendment material clearly indicating that the MWFC is critical to the success of the BREP, other than nominating a potential reservation for it, there is no other commitment to deliver it and BREP itself does not facilitate its delivery in anyway other than showing a proposed reservation. As a landowner who is significantly impacted by the proposed reservation of the MWFC, YourLand is seeking to better understand the timing for delivery and the legal mechanisms for the acquisition of the land by the state.

Our concerns are compounded by the fact that DTP have confirmed that the status of the MWFC **is a planning project**. And noted that **There are currently no plans for the construction of the Marong Western Freight Corridor**.

A preliminary concept design including identifying the land potentially required for construction has been developed for the preferred Marong Western Freight Corridor Option 5.

The BREP Background Report indicates that *...the BREP, as a regionally significant industrial precinct, **must be supported by efficient freight connections** that link Greater Bendigo to wider state and national logistics networks.*

YourLand are concerned that, while the Amendment positions the planning and delivery of the MWFC as central to the long term success of the BREP, there are no government commitments that provide any level of certainty regarding its timing or funding. This lack of commitment introduces a significant risk to the effective and orderly delivery of the BREP and has broader implications for the Marong Township.

If the MWFC is needed to support the BREP then the BREP should facilitate its delivery through a Development Contributions Plan to provide certainty.

The proposed Schedule to the DPO (Schedule 34, Clause 43.04) outlines conditions and requirements for permits including a requirement for the permit applicant to enter into a Section 173 Agreement with the Head, Transport for Victoria. The Agreement must provide for:

- The delivery of access points as shown in Map 1.
- This includes the expected timing of provision of each access points below including API Connection in the Marong Western Freight Corridor roundabout at the Wimmera Highway/Wilsons Hill Road/McCreddons Road intersection.
- **Any land to be vested in the relevant road authority as required for the upgrade of State infrastructure including the planned Marong Western Corridor.**

YourLand are seeking confirmation as to what is intended by the requirement to 'vest' the land in the relevant road authority. Because none of the detailed assessments relating to the need or timing of the MWFC have been provided, we have no way of understanding what is intended by this requirement and as such we require more clarity.

We submit that if required for the MWFC cannot be funded by a Development Contributions Plan, its role must be purely related to State based requirements meaning that its importance to the BREP has been over stated. Conversely, if the MWFC does have important role to play in the establishment of the BREP industrial land market, it would be fair and equitable for the land and first carriageway for the road to be funded by a precinct wide DCP. However, given no DCP has been prepared, the only remaining option is for the road authority to acquire the land.

- This would also allow the road to be funded through any shared infrastructure funding plan for the precinct, acknowledging its strategic importance to the BREP and the nexus. The land required for the road widening would be a state infrastructure item and acquired by the state. The overall area of land required for acquisition would be significantly reduced by utilising an existing road built to service the BREP.
- Can be efficiently collocated with precinct drainage infrastructure.
- Defines two operationally different precincts within the BREP to facilitate a greater diversity of industrial and employment land uses. This approach acknowledges the different spatial context within the BREP area with the north eastern portion of the BREP needing to support a transition between sensitive land uses and proposed heavy and intensive industries. Under the proposed alternative framework plan land north of the Council owned land would be zoned Industrial 3 Zone to cater for population serving industries and land uses more appropriately located adjacent to the adjoining residential areas (see sections 3, 4 and 7 for further discussion on land uses)
- Creates an opportunity to connect the Marong residential areas with the population serving industries and to connect the Precinct 1 and Precinct 2B residential growth areas of the Marong Township Structure Plan with local connector streets whilst diverting freight movements away from the town on the major freight route.
- Create a route that avoids significant truck movements needing to enter the township and protects the amenity, safety and character of the existing and planned Marong growth areas with the freight route diverting through the BREP before it enters the township areas.
- Creates optimal access and exposure for industrial land uses that are dependent on this for their successful delivery and interaction with customers and general population.
- Enables the protection of native vegetation and significant established trees within the existing Calder Alternative Highway and Wimmera Highway.
- Diverts the freight route away from significant Aboriginal and post contact heritage sites such as the Bullock Creek to the east of the Calder Alternative Highway.

2.6 Concerns in relation to independence of background work to inform the MWFC and BREP

The extent of coordination between Development Victoria/The City of Greater Bendigo as the developer/landowner, the VPA and DTP is such that the decision to select Option 5 as the preferred alignment of the MWFC cannot credibly be characterised as an external or standalone piece of work. Its development has been integrated into the BREP process with outcomes heavily influenced by the work being undertaken by Development Victoria who act as a development partner for Council as a landowner (noting that Council is not the only landowner in this precinct).

Presenting the MWFC as an independent input in the absence of transparent scrutiny, public consultation, or a proper comparative assessment of alternatives, obscures the degree to which its alignment has been shaped by specific interests of those responsible for the alignment and those who benefit from the avoidance of impact associated with the alignment.

We do not submit that coordinating the planning of the BREP and the MWFC is an unreasonable outcome; however, such coordination requires full transparency in relation to the decisions taken.

We argue that it has not been made clear how the MWFC alignment has informed the planned outcomes for the BREP and, conversely, how the BREP has guided and the arrangements for the MWFC. In the absence of any publicly available detailed planning or assessment for the MWFC, there is no publicly available defensible basis on which to support the alignment as currently shown. Without this information, the proposed location cannot be properly scrutinised, justified or relied upon as a sound strategic outcome.

3 Proposed Industrial 1 Zone Land

YourLand submit that there is insufficient detailed strategic justification for the proposed application of 294 hectares of Industrial 1 Zone (INIZ) land across the BREP. A more nuanced and evidence based approach is required to ensure that the BREP responds appropriately to the Greater Bendigo Industrial Land Development Strategy 2024 (GBILDS) findings and that it provides a balanced and flexible framework capable of accommodating a broad range of future industrial demands that respond to the Marong Township setting—including the Marong Growth Areas identified in the Marong Township Structure Plan (MTSP) and as shown at Clause 11.01-1L.

It is our submission that sufficient evidence has not been provided that justifies the rezoning of 294ha of land to the INIZ land. Further, appropriate consideration has not been given to the application of transitional zones to sensitive uses. This is particularly concerning given the location of the BREP immediately adjoining existing and future residential areas.

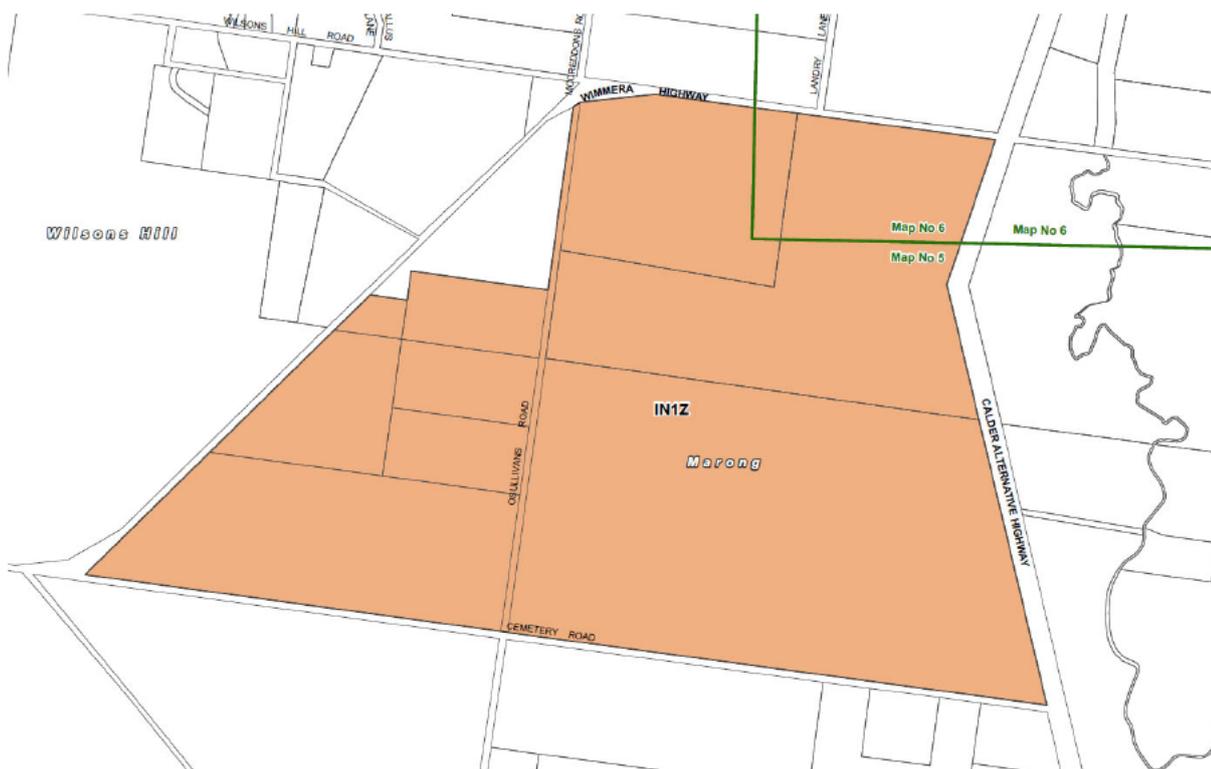


Figure 8. Proposed Zone Map

The Background Report states that the Amendment has been prepared by the VPA in consultation with the CoGB, Development Victoria (DV) and relevant agencies. The amendment implements the precinct as Bendigo’s key regional industrial and employment area. The Amendment is supported by the GBILDS which sets a strategy for the development of land and facilitation of investment to support industrial and employment growth in Bendigo. The GBILDS was introduced into the Bendigo Planning Scheme through Amendment C282 and sets up policy to support the planning of the BREP.

YourLand made submissions to Amendment C282 (see attachment 1), and it remains our position that the BREP will provide industrial land well in excess of the amount identified as required through the GBILDS. The GBILDS confirms the need for a supply pipeline of between 170 and 270 hectares of vacant industrial land over the next 30 years, inclusive of the existing 100 hectares of vacant land. Council also confirmed during the Amendment C282 Panel Hearing that the additional new supply of 170 hectares was calculated on the basis that some land would be constrained by land banking, proximity to existing residential development, vegetation cover and accessibility. The final figure adopted through GBILDS was therefore deliberately conservative.

It remains our long held position that zoning 294 hectares of land for future industrial purposes is not a sound or proportionate planning response when the evidenced demand over the next 30 years is for only 170 hectares of additional supply. Council already controls approximately 155 hectares of land in the southern portion of the BREP, which is capable of meeting the majority of this identified need. In this context, applying the INIZ across the full 294 hectare precinct is unjustified and does not respond to demonstrated demand.

Charter Keck Cramer (CKC) were engaged by the VPA to provide independent advice on the merit of delivering the BREP as a regional employment area. The CKC report acknowledges *the aspirations of The Greater Bendigo Industrial Land Development Strategy 2024 identify the need for 30 years of industrial land supply. According to Charter modelling the BREP incorporates between 24 and 30 years of industrial land supply and the CKC modelling assumes a net developable area of 206 hectares. The need for additional drainage and road space would see a decline in BREP's net developable area which would reduce potential years of supply. This is a realistic outcome given ongoing planning of the BREP.*

YourLand notes that even when assuming a net developable area of 206ha this is still in excess of the 170ha of land that is required through the GBILDS assessment that underpins the planning of the BREP.

The CKC report sets out that:

...within the region, Mount Alexander also lacks options to expand the footprint of its existing industrial precincts. Similarly, the Shire needs to investigate new greenfield land in locations not previously subject to industrial uses to provide industry opportunity to grow and operate. This will inevitably require significant environmental, infrastructure and transport analysis, infrastructure investment and community and landholder engagement. The Shire Council has committed to investigating the BREP as a potential regional industrial development option.

We submit that, if the BREP is intended to serve a broader regional catchment, the necessary assessment should have been undertaken through the GBILDS process and Amendment C282. There is no current policy that supports provision of land within the BREP to service other municipal areas. Whilst the Mount Alexander Shire have now commenced their own strategic planning work, the work that is required to substantiate the needs or demands of a much wider regional catchment is not complete and is currently only a recommendation of the draft Mount Alexander Draft Industrial Strategy to investigation opportunities. Accordingly, it is inappropriate to justify an expanded extent of INIZ land in the BREP on this basis, especially given that the purpose of the BREP is to respond to the GBILDS, not potential options that are not fully resolved through other processes.

The CKC report found that *population-induced demand, agriculture, manufacturing, mining and logistics investment, construction industry expansion, defence investment, new energy and waste needs and the restructuring of the economy to support local supply chain capacity provide positive conditions to fuel future industrial expansion.*

The CKC report also states that *there is a small and diminishing number of larger developable sites (greater than one-hectare) to sustain ongoing industrial development within Greater Bendigo. Over two thirds of recent industrial land development was derived from the development of larger (1 hectare +) vacant lots. In 2024, there were 19 large (1 hectare +) vacant industrial lots. Eleven of these lots are currently subject to a development process.*

YourLand acknowledge the need to accommodate larger lots in planning for future industrial areas in Bendigo. However, we do not agree that the entirety of the BREP should be set aside solely for this purpose. If the BREP is planned exclusively around large lot and heavy industrial outcomes as noted above from the CKC report, this would arguably be to the detriment of both the precinct and the broader objective of providing a diverse employment opportunities that cater to a variety of business and industry needs.

The background material fails to address any of the finer grain or population based demands for industrial or commercial land and instead focuses almost exclusively on the need for larger lots and intensive land uses that require substantial buffers. In our view, this represents a significant shortcoming in the background work and results in an incomplete understanding of the full spectrum of industrial and employment needs relevant to the BREP and its strategic context.

CoGB own 155ha of land that can be zoned Industrial 1 and can be subdivided into larger lots to service demand for more intensive industrial uses that require larger buffers from sensitive uses. The CoGB land presents the following key opportunities:

- The land is all within one ownership with limited constraints
- It can facilitate the creation of large industrial allotments that respond to the demand established in GBILDS.
- It is ideally located to enable the establishment of appropriate buffers to sensitive uses to the north and east to be implemented

The BREP Background Report states, in relation to BREP's Strategic Positioning, that *the BREP site is within proximity to Marong Township, without directly abutting residential uses.* This is fundamentally incorrect. The BREP is within proximity of the Marong Township and it directly abuts future residential areas that are confirmed in the Planning Scheme as adopted policy by the State at Clause 11.01-1L.

As currently adopted, the Marong Framework Plan identifies Precinct 2 within the BREP as Proposed land use subject to investigation and includes an icon for interfaces (see Figure 9). The BREP Amendment includes no strategic investigation to support this area being zoned as Industrial 1 Zone and the relocation of the interfaces.

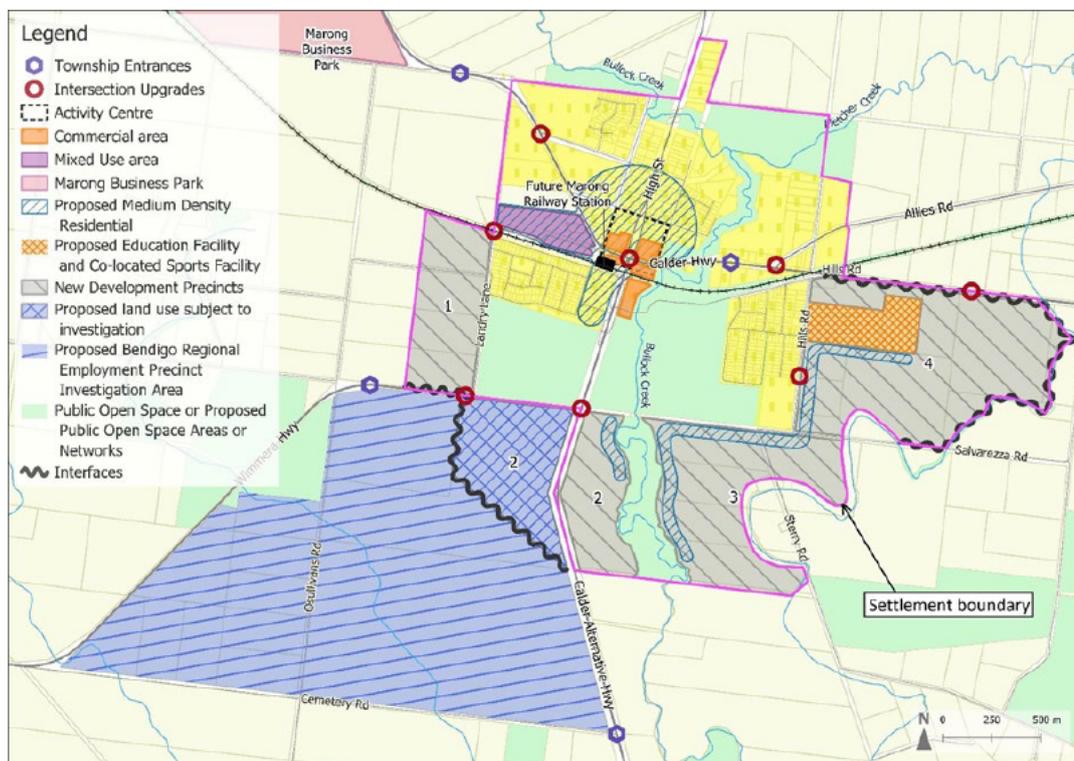


Figure 9. Marong Framework Plan – Cause 11.01-1L

YourLand submit that a transitional land use should be applied to the area currently identified as 'land use subject to investigation'. We recommend that the Industrial 3 Zone (IN3Z) is the most appropriate zoning response for this area as it would provide a necessary buffer to the adjoining residential growth areas identified in the MTSP and Clause 11.01-1L. The IN3Z facilitates a range of industrial and transitional land uses that are compatible with nearby sensitive uses while still contributing meaningfully to the employment function of the BREP.

Importantly, applying the IN3Z in this location would support the orderly development of the precinct by:

- ensuring an appropriate interface between higher impact INIZ uses and the existing and planned residential areas;
- enabling population serving industrial and commercial activities that benefit from proximity to the Marong township and its future residential catchment;
- creating a more nuanced and context responsive land use framework that aligns with the strategic planning principles applied in comparable industrial and employment precincts; and
- reinforcing the role of the BREP as a balanced and diverse employment area rather than an enclave dedicated solely to large lot, high impact industrial development.

In YourLand's view, the application of the IN3Z represents a strategically sound and proportionate response that better reflects the sensitive township context, provides a clear transition between industrial and residential land uses, and ensures that the BREP can accommodate a broader spectrum of industrial and employment needs consistent with contemporary planning practice.

The application of the IN3Z is further discussed in section 4 of this submission.

4 Integration with Marong Township and Residential Growth Area

YourLand submit that further consideration must be given to how the BREP will integrate with the Marong Township. In its current form, the BREP effectively turns its back on the township and appears to have little regard to how the precinct will integrate with the planned urban area. Despite the precinct's immediate proximity to two future residential growth areas—both identified for housing expansion within the Bendigo Planning Scheme—the *BREP Background Report* neither acknowledges nor responds to this critical interface and indicates that the BREP site is within proximity to Marong Township, without directly abutting residential uses.

The Explanatory Report is also silent on the need to respond to the context of the site in proximity to an existing residential growth precinct.

This omission represents a missed strategic opportunity. The BREP sits alongside one of the municipality's largest areas of planned residential growth, yet the proposed zoning framework fails to leverage this context or to provide the ability of intensive industrial development to transition as it gains proximity to sensitive land uses. We submit that this is the current practice in all recent employment PSPs in metropolitan growth areas. Instead, the application of Industrial 1 Zone up to the residential interface and the relocation of the interface lines (as shown on the proposed changes to Clause 11.01-1L Marong Framework Plan) up to the boundaries of the BREP, creates an abrupt and poorly considered transition that undermines both township integration and long term land use compatibility.

Planning Practice Note 92 (PPN92): *Managing buffers for sensitive uses sets out the following:*

Ensuring land use compatibility is fundamental to the objectives of planning in Victoria. Where separation between incompatible uses is not considered as part of the planning process, land use conflict can occur. This often results in situations where the operation and viability of industries, including critical infrastructure, is threatened while communities are put at risk.

At present, the amendment does not consider separation of incompatible uses, nor does it include sufficient safeguards. This lack of consideration risks jeopardising the viability of the industrial uses proposed for the BREP as well as the viability of future residential areas within New Development Precincts 1 and 2.

In our submission, we argue that a more balanced and context responsive approach is required—one that recognises the scale of residential growth in Marong, provides appropriate industrial residential interfaces, and ensures that the BREP contributes positively to the township rather than functioning as an isolated or inward facing industrial enclave.

We contend that the proposed planning controls do not go far enough to protect the future amenity of Marong Township and the residential growth areas, considering:

- The requirements included in the proposed DPO34 are weak, and the Land Use Concept Plan included at Map 1 fails to address potentially sensitive interfaces
- The proposed changes to the Marong Framework Plan ignore potentially sensitive interfaces
- Clause 11.03-6L-04 (Bendigo Regional Employment Precinct) includes no commentary about the BREP's integration with the township
- There is an over reliance on Clause 53.10 to manage amenity impacts

Each of the above is addressed in turn.

4.1 Schedule 34 to Clause 43.04 (Development Plan Overlay)

As drafted, the only reference in the DPO34 to the Marong Township or the Marong Residential Growth Areas and any need to respond to the township or the sensitive interfaces is in Clause 1.0 (Objectives), which states:

To identify sensitive interfaces and encourage compatible land uses and development that enhance the built form for an employment precinct.

The BREP Concept Plan which is included in the DPO34 at Map 1 does not address sensitive interfaces or consideration of the Marong Township. We consider this to be a significant failing of the DPO34.



Figure 10. BREP Concept Plan

4.2 Marong Framework Plan

The proposed updates to the Marong Framework Plan at Clause 11.01-1L include removing the 'proposed land use subject to investigation' designation that is currently shown in the planning scheme and relocating the 'interface' icons to run along the interfaces with the future residential growth areas. We note that none of the technical background reports that have informed the proposed amendment appear to have addressed the need to investigate the land use in this area. YourLand argue that if the investigation has occurred to support

this change and it appropriately justifies the designation of the investigation area to Industrial 1 Zone, then should be provided as part of the Amendment documents.

We argue that it is simply inappropriate to change how something appears within a gazetted planning policy which was established through a public process without first having demonstrated its redundancy. Until the investigation can be provided, we must assume that the relocation of the interface icon and the removal of the reference to “land use investigation” was done to eliminate an inconvenient direction.

Notwithstanding, we also submit that if the interfaces are to be retained in the locations proposed that these should also be carried through and shown on the BREP Concept Plan with more detail in terms of development plan requirements to assist with an explanation of what these ‘interfaces’ represent.

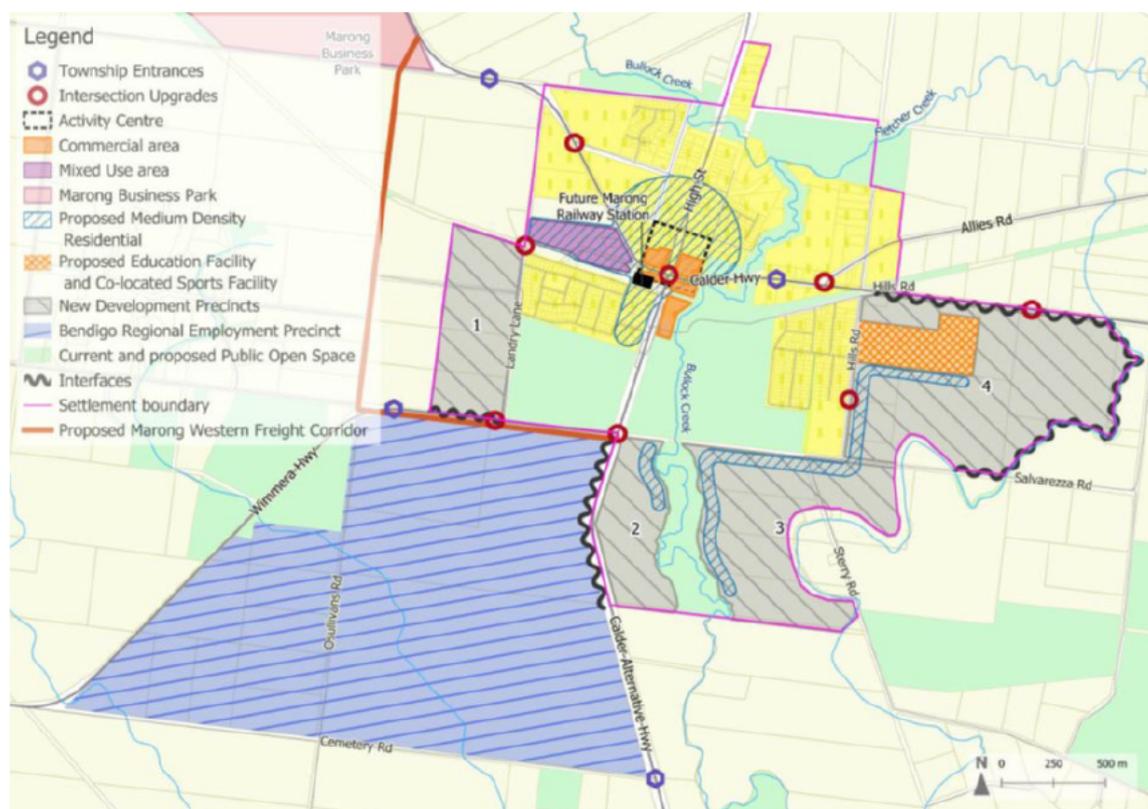


Figure 11. Proposed changes to the Marong Framework Plan – Clause 11.01-1L

Clause 11.03-6L-04 proposes to introduce the BREP under Planning for Places, Regional and Local Places. This proposed policy applies to land within the BREP on the map included at Figure 11. The objective of this policy is:

To support the development of the Bendigo Regional Employment Precinct as the key industrial and employment area for the municipality and broader region.

There is no requirement in the strategies listed under the policy to respond to the Marong Township in any way.

4.3 Clause 11.03-6L-04 (Bendigo Regional Employment Precinct)

As drafted, Clause 11.03-6L-04 (Bendigo Regional Employment Precinct) includes no reference to the employment areas integration with Township – neither existing sensitive uses nor the planning New Development Precincts.

4.4 Over-reliance on Clause 53.10

The BREP Background Report indicates that the Amendment will leave Clause 53.10 (Uses with Adverse Amenity Potential) to ensure appropriate siting and design responses at the permit stage. This seems entirely insufficient.

Clause 53.10 is designed to trigger additional planning permit requirements for a limited list of industrial uses located within a specified distance to sensitive uses. Many of the uses listed in table 1 of clause 53.10 refer to situations where a production threshold is exceeded as the trigger for the additional permit and referral requirement for an otherwise as of right use. While Clause 53.10 also triggers a mandatory referral to the EPA for applications that use land for a purpose listed in the table, the referral only applies if the threshold distance is not met or if no threshold distance is listed. In any case the reliance on Clause 53.10 as the sole mechanism to consider land use compatibility with planned adjoining areas is insufficient primarily because the clause is not designed to consider accumulative impacts associated with the output of a larger precinct.

In the Melbourne growth areas, employment PSPs prepared by the VPA recognise the need to provide direction for land uses in proximity to sensitive uses as an essential organising principle of the plan. The examples shown below serve to demonstrate how current best practice applied a transitional zoning where future employment and industrial land uses interface with residential areas.

PSPs for Croskel, Officer South and Casey Fields South all address the need to respond appropriately to residential areas and establish transitional zones that enable economic development and job creation by responding to industrial land demand while balancing the need to protect the amenity of residential areas to lower the risk of conflicting land uses. The PSP plans for Croskel, Officer South and Casey Fields South are attached.

YourLand submit that transitional zoning should be introduced to the BREP to give greater certainty with regards to appropriate land use planning. The application of the IN3Z in the northern half of the BREP (as detailed in Section 3 of this submission) would assist in addressing the concerns raised).

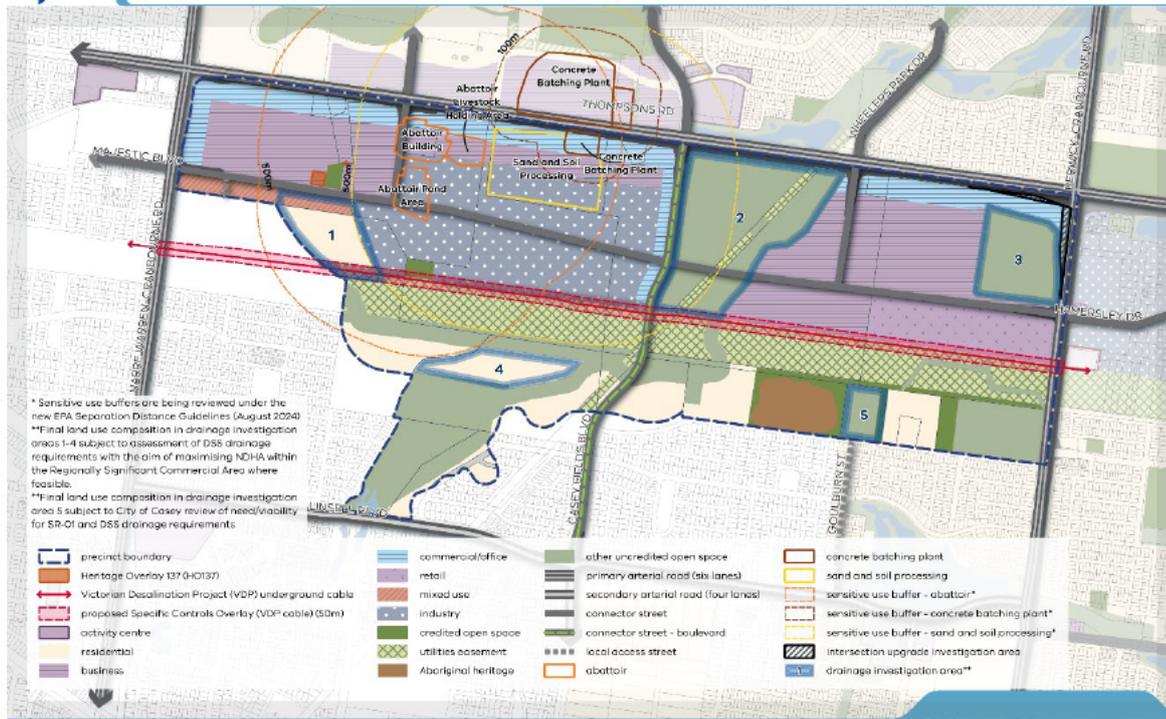


Figure 12. Croskell Employment PSP (Draft)

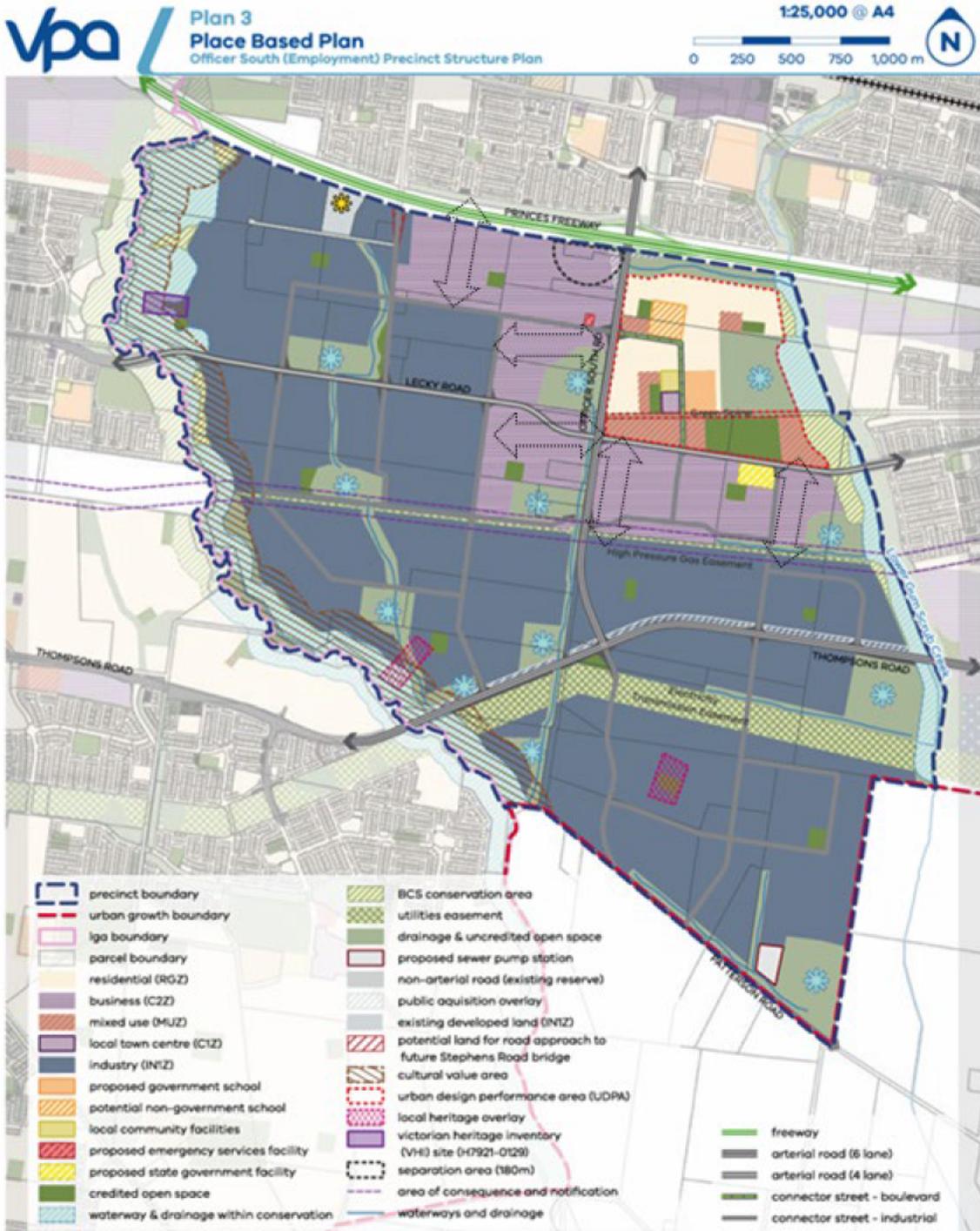


Figure 13. Officer South Employment PSP

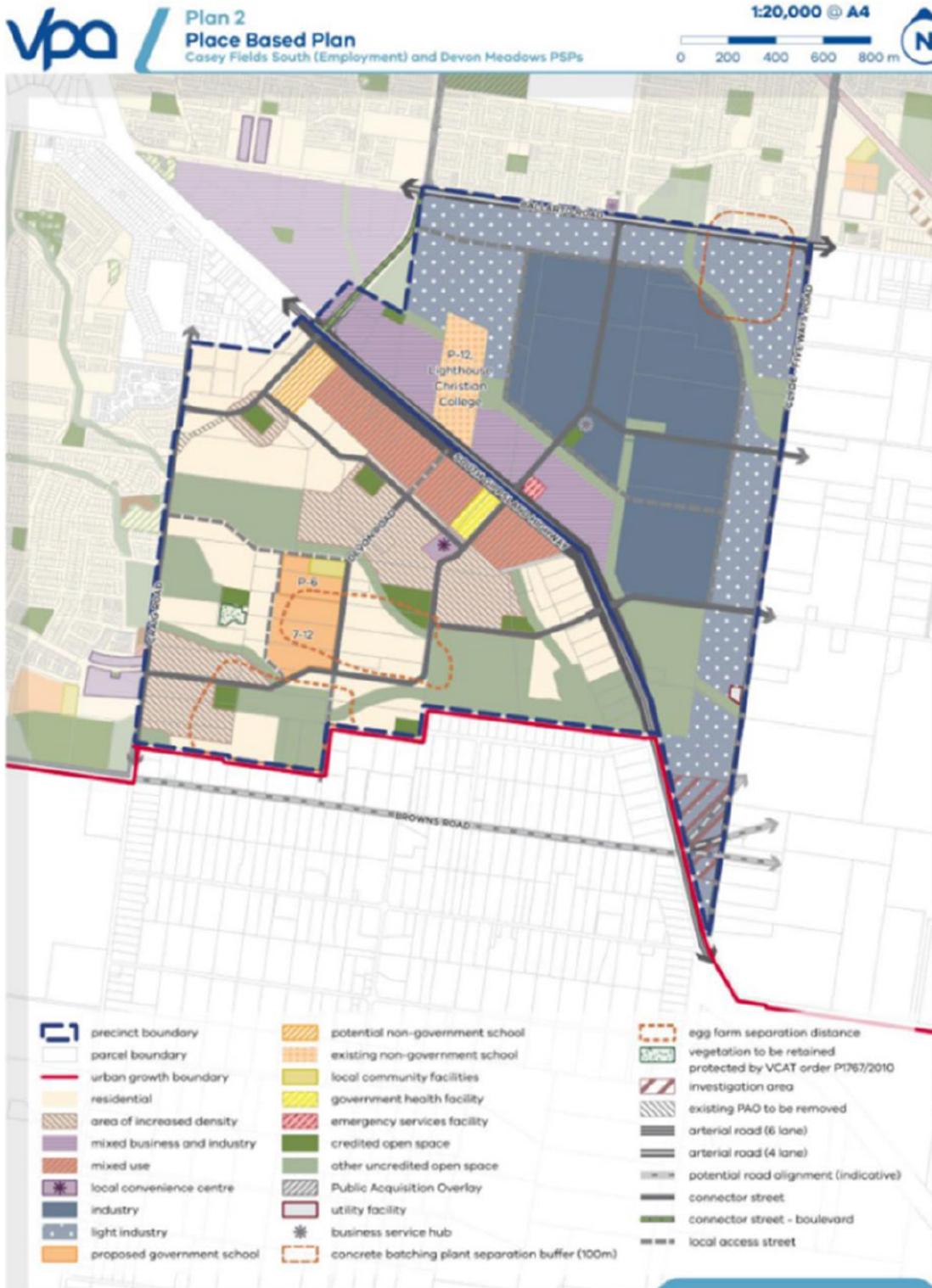


Figure 14. Casey Fields south Employment PSP (Draft)

5 Utilities & Servicing

5.1 Drainage Strategy

YourLand has reviewed the material relating to stormwater and drainage and has significant concerns regarding stormwater management and infrastructure planning. The VPA's shift from a comprehensive PSP to a more flexible framework has raised concerns. The BREP Background Report emphasizes the need for an integrated approach to avoid piecemeal outcomes. However, the lack of a specific overall drainage study has led to reliance on the Development Victoria drainage strategy, which has been criticized for not providing a cohesive solution for the precinct's complex drainage needs. As noted above while we respect the fact the Development Victoria are government body, they nonetheless represent the development interests of the City of Greater Bendigo as a landowner.

We raise the following key concerns in relation to this Amendment:

- **Lack of comprehensive study** – The VPA did not commission an overall drainage study for the BREP framework, relying instead on a drainage strategy from DV that addresses only part of the precinct.
- **Piecemeal approach** – The strategy's reliance on independent water quality and quantity assets for each sub-precinct raises concerns about integration and overall effectiveness. The review emphasizes that this strategy results in a fragmented system that does not optimize drainage solutions across the precinct.
- **Inadequate funding mechanism** – The absence of a DCP for shared drainage infrastructure poses risks of inequity and inefficiency. The proposed delivery model relies on direct infrastructure provision through development plans and agreements, which may lead to inconsistent outcomes, delays and development inefficiencies (this is discussed further in section 6).

In order to attract the type of investment to Marong as envisioned by the BREP future interests will need to see an appropriate degree of planning and delivery certainty. As such, the BREP's drainage infrastructure requirements must present a complete picture and be strategically planned and funded to avoid piecemeal outcomes, unforeseen risks and hidden costs.

In the absence of a Development Services Scheme, a DCP mechanism would be an appropriate mechanism to ensure that shared infrastructure is equitably developed. The Concept Plan should also accurately represent all of the drainage assets to provide clarity and certainty for future developments.

As drafted, there are critical flaws in the BREP stormwater management strategy. The strategy requires significant improvements to ensure effective and integrated drainage solutions, maintaining environmental and community benefits while accommodating future growth. YourLand submit that the absence of a comprehensive, precinct-wide drainage strategy represents a fundamental deficiency in the Amendment. Drainage must be addressed holistically at the precinct scale, and shared drainage infrastructure should be incorporated into a Development Contributions Plan to ensure certainty, equity, and orderly delivery across the BREP.

5.2 Utilities Servicing

The Aurecon Utility Servicing Assessment 2024 and the more recent Stantec Precinct Infrastructure Strategy 2025 (prepared to provide guidance for the Council land) outline a number of major servicing constraints for the BREP. Key constraints outlined include:

- The limitations of the existing sewerage capacity temporarily available to BREP (which is not guaranteed as is dependent on residential development), whilst the ultimate sewer solution being costly (forecasted to exceed \$25m) with significant delivery lead times, risk and lack of defined funding model or feasibility raises significant concerns in relation to the viability of delivering industrial land in this location without a well-considered and coordinated solution early on in the process.
- Determining how the ultimate sewer solution will be funded, cost shared or land provisions made available for any other alternative solution should be resolved as part of the Amendment process to ensure greater certainty that the BREP is viable.
- The potable water augmentation seems to rely heavily on a plan to extend mains along a section of land to the north of MTP Precinct 2. This area is known to contain significant native vegetation, is in Crown land and will be the subject of a CHMP process. YourLand question the level of detailed investigation that has taken place to rely on this as a solution any time in the near future.
- Very little Powercor distribution in the BREP area and need for significant upgrades through the precinct and external to the site again undermining the viability of the precinct

6 Shared Infrastructure Plan

The Amendment proposes that development contributions will be managed through infrastructure funding plans prepared as part of the Development Plan process and implemented via section 173 agreements. Under this approach, BREP proponents would need to prepare a Shared Infrastructure Funding Plan and enter into agreements with Council and DTP to deliver and fund shared infrastructure.

YourLand contend that a Shared Infrastructure Funding Plan and Section 173 Agreements is an unacceptable funding framework. A Development Contributions Plan (DCP) should be prepared to ensure that shared infrastructure is funded appropriately and with certainty.

The BREP Background Report states that *the fragmented land ownership pattern in BREP makes the DPO the most appropriate planning tool. The BREP contains a mix of rural lifestyle holdings, developer-controlled parcels, family-operated mid-sized lots, and substantial public land. Without a coordinated mechanism, these differing interests risk delivering piecemeal and inefficient outcomes.*

As previously detailed, CoGB own 52% of the precinct in a single consolidated holding, and YourLand control a further 21%. This leaves approximately 27% of the precinct not owned or managed by a developer or CoGB. On this basis, a DCP would be a more appropriate funding mechanism.

The BREP Background Report further notes that *the BREPs infrastructure requirements are largely limited to internal industrial road networks, connections to the external road network, a service extensions, and drainage, with no need for the full Development Contributions Plan and community facility sequencing that a PSP would mandate. These can be coordinated efficiently through the DPO's requirement for a comprehensive development plan, supported by infrastructure agreements as needed.*

YourLand submit that this approach carries significant risk. Without clear expectations regarding shared infrastructure established through a well coordinated Development Contributions Plan from the outset, the delivery of essential infrastructure may lack consistency, fairness, and certainty across the precinct.

The proposed approach to development contributions is difficult to follow and lacks a clear, consolidated explanation of how shared infrastructure would be delivered in a way that aligns with Victorian development contribution principles. It is not evident that alternative funding mechanisms, such as a formal Development Contributions Plan, have been properly assessed, despite the presence of multiple landowners and relatively advanced infrastructure planning. Overall, the approach appears unresolved and highly uncertain, relying on a complex and bespoke set of plans, agreements and guidelines, with no clear rationale for departing from established planning scheme tools.

7 Proposed Planning Scheme Amendment

This section of the submission focuses on the proposed planning controls and highlights areas of YourLand's key concerns. In some cases we provide examples on a without prejudice basis for how the proposed controls might be improved.

7.1 Clause 02.03 Strategic directions

The amendment proposes a series of sweeping changes to Clause 02.03 of the Greater Bendigo Planning Scheme. Our concerns with the updates are highlighted below.

Clause 2.03-1 (Settlement) includes the following strategic direction which is relevant to BREP:

Promote the Bendigo Regional Employment Precinct as the key industrial and employment area for the municipality and broader region, providing large lots and adequate separation distances for intensive industries and access to the Principal Freight Network.

The current BREP plan is not aligned with the above strategic direction where:

- Separation distances between potential high impact industrial uses and future residential areas are not explicitly incorporated.
- Access arrangements as set out in the VPA and Stantec background reports do not provide sufficient access to the road network and Principal Freight Network from Precinct 2A.

At Clause 02.03-7 (Economic development) it is noted that (our emphasis) –

"Many of the areas set aside for industrial use, particularly in the Bendigo urban area, are not suitable to the needs of modern industry due to small lot sizes and adjoining incompatible land uses, as shown on the Urban strategic framework plan in Clause 02.04. The Bendigo Regional Employment Precinct will provide much needed, appropriately located and sized land for the future industrial, business and employment needs of the municipality and broader region"

The clause goes on to set out the strategic directions for economic development for Greater Bendigo which include (our emphasis) –

Direct industrial growth to appropriately zoned land, with the Bendigo Regional Employment Precinct as the preferred location for large or intensive industries with off-site amenity impacts.

In the above strategic direction of Clause 02.04, there is a lack of nuance and awareness of the spatial context of the BREP. The BREP does in fact adjoin areas set aside and identified elsewhere in the planning scheme for the future development of sensitive uses. The expansion of the Marong township for residential growth is established in the Marong TSP which Clause 11.01-1L gives effect to. Therefore, large or intensive industries with off-site amenity impacts should be directed away from future development precincts in particular Precincts 1 and 2. YourLand submit that the following amendment to Clause 02.04 would address the lack of consideration regarding the broader scope of development in Marong.

Amend Clause 02.04 as follows:

*Direct industrial growth to appropriately zoned land, with the Bendigo Regional Employment Precinct as the preferred location for large or intensive industries with off-site amenity impacts, **where it can be demonstrated that the amenity of future residential precincts can be protected.***

Clause 2.03-8 (Transport) includes the following:

The provision of the planned Marong Western Freight Corridor will support both access to the Bendigo Regional Employment Precinct, and the efficient safe and sustainable movement of freight through the municipality and broader region.

More work is required to understand the freight industry, how it is using the road network, and potentially the rail network and how efficiencies and productivity could be improved.

We make the following submissions in relation to the MWFC route:

- The current MWFC route as included in the BREP Concept Plan and supporting documents is inefficient and indirect. It is therefore contrary to the stated purpose of the route. In addition parcels abutting the route are unreasonably impacted by limited access (restricted to left in-left out arrangements). We fail to see how this type of arrangement supports efficient access to the BREP.
- None of the proposed amendment documents including the VPA background report provides any certainty for delivery of the MWFC.
- The Stantec traffic analysis finds that the whole of BREP could be developed without the construction of the MWFC. To reach this conclusion, the Stantec report relies on low traffic generation rates and ignores the potential development of the Marong Business Park (~310ha of Comprehensive Development Zone)
- We find it concerning that one of the key technical background reports commissioned to support the establishment of the BREP does not support the need for the MWFC despite part of the justification for the amount of land being rezoned to INIZ being its location on the MWFC.

Clause 02.03-9 (Infrastructure) includes the following strategic directions for development infrastructure in relation to BREP:

Ensure that infrastructure and servicing meets the needs of businesses and employment generating uses in identified locations such as the Bendigo Regional Employment Precinct.

Develop an integrated freight network and precinct plan for Bendigo Regional Employment Precinct that safeguards key freight corridors, identifies locations for heavy vehicle and trailer exchange facilities, and establishes a regional freight activity hub.

YourLand contends that the BREP Concept Plan does not achieve the strategic directions stipulated at Clause 02.03-9:

- The road and access infrastructure afforded to YourLand's landholding within the BREP does not meet the needs of businesses and employment generating uses.
- A single left-in via Wimmera Highway and a left-out to Calder Alternative Highway does not allow for traffic to arrive from and depart to all directions. The alternative access for this parcel requires lengthy detours and relies on large radius roundabouts on the MWFC which may not be built, as well as road connections which run through land parcels owned by others.

- With reference to the safeguarding or key freight corridors, the current preferred alignment of MWFC brings substantial heavy vehicle traffic up past planned residential areas including Precincts 1 and 2B.

The proposed alternative plan as included at Section 2 of this submission separates the industrial traffic and freight corridor from the Marong township (including future residential areas), reduces the travel distance and better serves both the BREP and the Marong Business Park CDZ.

The conclusion and one of the reasons given as to why Option 5 was selected as the preferred MWFC alignment being it will remove heavy vehicle traffic from the centre of Marong township is a simplistic assumption which cannot be achieved without the northern connection along the McCreddons Road to the Calder Highway.

Therefore, it is our submission that the MWFC requires a Public Acquisition Overlay (PAO) in order to properly safeguard the planned outcomes for the future route, particularly given that part of the route is located outside of the BREP precinct boundary.

7.2 Clause 11.01-1L Settlement - Marong

As previously detailed, the amendment proposes to update the Marong Framework Plan at Clause 11.01-1L. In the updated plan, the 'proposed land use subject to investigation' designation would be removed and the 'interface' icons would be relocated to run along the interfaces with the future residential growth areas. The updated plan also includes a designation for the Marong Western Freight Corridor. A comparison of the two plans is included below.

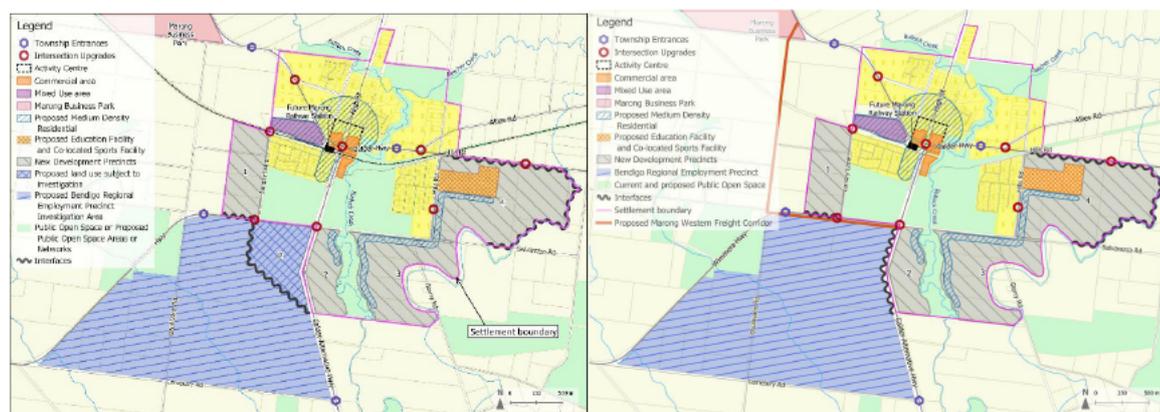


Figure 15 Comparison of existing (existing) and proposed (right) Marong Framework Plan

We make the following key points in relation to the Marong Framework Plan:

- The version of the plan gazetted via Amendment C263 and currently incorporated in the Greater Bendigo Planning Scheme came as a result of an extensive process which followed the principles of orderly and proper planning. It recognises the need to enable a transition between the surrounding neighbourhood areas (both existing and future) and the more typical industrial uses which the Council owned part of the BREP aspires to attract. Indeed, we argue that a defined transition area between heavy industry and sensitive uses will enhance BREP's ability to attract industries requiring large lots and setbacks by directing them away from sensitive areas and avoiding encroachment.
- The location of the MWFC varies significantly from the two route options identified in the Marong Township Structure Plan. Coupled with the fact that the process of determining the current "preferred"

alignment has been anything but transparent, it is difficult to see how it achieves a good outcome. We submit that in addition to restricting the development of the BREP, the current preferred route does not adequately protect existing and future residents of Marong and such should be further interrogated before it is adopted into the planning scheme as proposed. We make this submission on the basis that we have found no evidence in any of the supporting documents associated with Amendment C296 that provides adequate justification for the proposed amendments to the Marong Framework Plan.

7.3 Clause 11.03-6L-04 (Bendigo Regional Employment Precinct)

As drafted, Clause 11.03-6L-04 (Bendigo Regional Employment Precinct) includes no reference to the employment areas integration with the Township – neither existing sensitive uses nor the planning New Development Precincts. The objectives and strategies are inward looking, addressing only the industrial and employment outcomes desired.

We propose that the first strategy be updated as follows:

Facilitate the coordinated growth of the Bendigo Regional Employment Precinct to provide for the region's future industrial employment needs, whilst safeguarding the amenity of the existing township and planned New Development Precincts.

This small but necessary change will assist in setting the intention for due consideration to be given to the impact of the future industrial precinct on existing and future planned sensitive uses at the edge of Marong Township.

We also note that the Clause includes the following statement:

Sequence and prioritise industrial land use and development in the Bendigo Regional Employment Precinct where access to the planned Marong Western Freight Corridor is provided.

It is not clear whether this means that development of the whole of BREP would be prioritised, i.e. in preference to the already zoned CDZ land to the northwest of the Marong Township, or whether the intent is to prioritise development of the parts of BREP that have access to the MWFC.

If it is the latter, it is noted that there is no commitment from the road authority to build the MWFC so it is not clear how access and potential prioritisation of development would occur in the absence of the MWFC. If access is restricted to the existing freight network (i.e. Calder Alternative Highway and Wimmera Highway), this is likely to favour the Council-owned property which has full directional access to Calder Alternative Highway proposed via a roundabout access point.

7.4 Clause 33.01 Industrial 1 Zone

YourLand submit that the application of the Industrial 1 Zone across the entire precinct does not adequately address the existing sensitive interfaces within the Residential Growth Areas.

The purpose of the Industrial 1 Zone is *to provide for manufacturing industry, the storage and distribution of goods and associated uses in a manner which does not affect the safety and amenity of local communities.*

Whilst the purpose of the INZI goes some way to addressing safety and amenity of local communities, YourLand submit that a far more superior zoning would be the Industrial 3 Zone where the purpose is:

- *To provide for industries and associated uses in specific areas where special consideration of the nature and impacts of industrial uses is required or to avoid inter-industry conflict.*
- *To provide a buffer between the Industrial 1 Zone or Industrial 2 Zone and local communities, which allows for industries and associated uses compatible with the nearby community.*
- *To allow limited retail opportunities including convenience shops, small scale supermarkets and associated shops in appropriate locations.*
- *To ensure that uses do not affect the safety and amenity of adjacent, more sensitive land uses.*

YourLand submit that applying the Industrial 3 Zone to the northern portion of the Precinct would clearly delineate areas where greater consideration of land use compatibility is required, and where it is not. A key objective of the BREP is to provide land for industrial purposes in a manner that avoids the conflicts that have arisen elsewhere in Bendigo where Industrial 1 Zone land is located directly adjacent to residential uses. Such conflicts should be avoided through the careful and deliberate planning of the BREP.

The Industrial 3 Zone would continue to provide land for industrial purposes and support the objectives of the Greater Bendigo Industrial Land Development Strategy, while also responding appropriately to the sensitive township and residential context of the site.

7.5 Schedule 34 to Clause 43.04 (Development Plan Overlay)

Use of the Development Plan Overlay in lieu of a Precinct Structure Plan

YourLand submit that the use of the DPO in lieu of a PSP is inappropriate.

The BREP Background Report states that *other large-format industrial precincts in regional Victoria (e.g. parts of Logic Wodonga, Ballarat West Employment Zone) have successfully been delivered under DPO frameworks rather than PSPs, balancing strategic certainty with delivery flexibility.*

Logic Wodonga was entirely owned by the Wodonga Council, and therefore a PSP process was not required for its delivery. Similarly, the Ballarat West Employment Zone was predominantly owned by the Ballarat Council, with the remaining land held by the Crown. In contrast, while CoGB own approximately half of the BREP area, a further 48% is held in private ownership. In this context, ensuring a well considered and robust strategic planning process for the future development of the precinct is critical.

BREP Concept Plan (Map 1)

As detailed in the preceding sections of this document, YourLand submit that the inclusion of the BREP Concept Plan at Map 1 of DPO34 in its current form is inappropriate. The plan relies on preliminary reports that lack the level of detail and resolution required to justify incorporation into the planning scheme. These deficiencies are reflected across several of the supporting technical reports, and our concerns regarding those documents have been outlined in detail throughout this submission.

The BREP Concept Plan, when coupled with the following requirement (Clause 4.0) of the draft DPO34 schedule, should be reconsidered:

The Development Plan must be generally in accordance with the concept plan provided at Map 1 of this schedule. A Development Plan may be considered generally in accordance, despite variations from the layout shown in Map 1 to this Schedule, where that variation is necessary to protect or respond to Aboriginal cultural heritage.

The above requirement suggests that the only variation to the Concept Plan that can be considered in the preparation of a future Development Plan is a variation relating solely to Cultural Heritage. This is considered to be inappropriate, particularly given the lack of resolution and strategic justification in the material that underpins the exhibited BREP Concept Plan.

While a Concept Plan may be appropriate to include within the DPO Schedule, the level of detail shown on the current exhibited version requires further consideration—especially if flexibility in the interpretation of “generally in accordance” is to be so limited.

YourLand support the establishment of a planning framework that enables the expedited delivery of industrial land in Bendigo; however, this must not come at the expense of good, fair, and properly justified planning for the entirety of the BREP.

The BREP Background Report states that *while not formally adopted as a development plan, DV’s infrastructure studies represent the intent of a draft development plan. They provide sufficient detail on infrastructure and servicing to explain the infrastructure requirement and illustrate the development concept on the CoGB’s land and establish a robust basis for the development layout on the CoGB’s land under the Concept Plan of the DPO schedule.*

YourLand do not agree that the background reports prepared by DV provide sufficient detail on infrastructure and servicing to justify their incorporation into a Concept Plan within the DPO Schedule. This concern specifically relates to drainage, servicing, and transport, where the exhibited material does not provide either the strategic justification for the infrastructure shown on the Concept Plan or adequate solutions to the known drainage and servicing constraints within the precinct.

In preparing this submission YourLand has prepared an alternative BREP Concept Plan. The alternative plan will meet the objectives of GBILDS and state and local policy, as well as creating a more appropriate interface with the future residential land to the east and the existing township to the north. The plan responds to the concerns raised in sections 2, 3 and 4 of this submission, and is included at Figure 16.

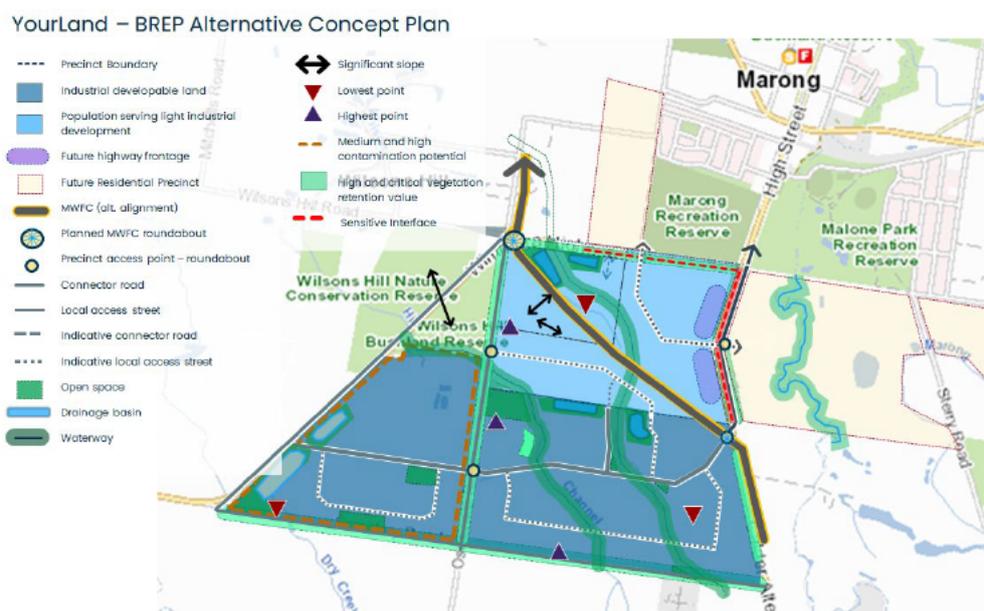


Figure 16. YourLand proposed alternative land use Concept Plan

The alternative Concept Plan includes the following:

- Proposes a new alignment for the Marong Western Freight Corridor through the BREP (and away from sensitive uses to the north and east of the BREP))
- Delineation of preferred industrial uses – with large format and intensive industrial uses generally in the southern portion of the precinct and lighter industrial uses preferred in the northern portion of the BREP
- Clear identification of sensitive interfaces with future residential precincts to the north and east of the BREP
- Additional indicative local access routes to improve the movement network
- Inclusion of indicative locations for drainage and stormwater drainage infrastructure.

Requirements of DPO34

YourLand have significant concerns in relation to the drafting of Schedule 34 to Clause 43.04 (DPO34). The objectives, included at Clause 1.0, do not adequately recognise the BREP's location at the edge of an existing township and with an interface to areas recognised as future residential development precincts. The only objective that recognises sensitive interfaces is:

To identify sensitive interfaces and encourage compatible land uses and development that enhance the built form for an employment precinct.

The objective should be strengthened, and we propose the following updated text:

*To identify sensitive interfaces and ~~encourage compatible~~ **allow** land uses and development that **will** enhance the built form for an employment precinct **and is compatible with adjoining sensitive use.***

We also propose the following objective should be added:

To prioritise heavier industrial uses in the southern part of the precinct and provide an appropriate transition to the Marong Township to the north and east.

Furthermore, there are substantial requirements included at Clause 4.0 *requirements for development plan*, however none of the requirements pertain to recognising sensitive interfaces or encouraging compatible land uses. During the preparation of a development plan in the future, a key consideration should be the relationship and interface of the BREP with its adjoining sensitive uses.

We also have concerns with Section 2 of the DPO34:

*A permit may be granted to subdivide land or construct a building or carry out works before a development plan has been prepared to the **satisfaction of the responsible authority, for the following:***

- **Subdivision of the land into super lots or to realign property boundaries, or create a road, or create or remove easements**
- **Works required for physical infrastructure or utilities to service the land**
- *Extensions or alterations to an existing building or works associated with an existing residential use*
- *Extensions or alterations to an existing building or works associated with an existing industrial use.*

Before granting a permit, **the responsible authority** must be satisfied that the permit will not prejudice the preparation of a development plan and future use and development of the land in an integrated and orderly manner as an employment precinct, and:

- The use and development of land as an employment precinct will not be compromised.
- The permit will not cause offence or unacceptable risk to the existing sensitive land uses or prejudice the future new development precincts listed in the Marong Framework Plan.
- The development meets any applicable utility service requirements.

YourLand have significant concerns regarding the CoGB acting as both a major landowner within the BREP and the Responsible Authority. The discretion afforded to CoGB to determine whether a Development Plan is required for the uses and development listed above creates a substantial risk of a process that lacks transparency and undermines the opportunity for proper, precinct wide planning. This is particularly concerning given the level of detail shown on the exhibited Concept Plan, much of which YourLand considers to be unsupported by the background work.

YourLand submit that no permit should be issued to create roads or undertake works for physical infrastructure or utilities to service the land until a precinct wide Development Plan (or other suitable precinct wide plan) is prepared including a precinct wide plan to fund and deliver infrastructure.

YourLand acknowledge that CoGB have ambitions to expedite the process of development of the BREP, however there is a very real chance that there will be no opportunity for other stakeholders to review and make submissions in relation to proposed uses, development or subdivision that could have significant implications for the future delivery of the BREP more broadly. These exemptions should be removed.

We also consider that in the interest of avoiding potential conflict of interest, CoGB should remove themselves as the RA of the BREP and handover duties to the State. This is particularly important given that there is no Development Contributions Plan in place. Coordinated and fair infrastructure delivery could be compromised by the early issue of permits for development.

Clause 72.08 – BREP Shared Infrastructure Plan

Clause 72.08 is proposed to be amended to include the background document *Bendigo Regional Employment Precinct Guideline for Preparing Shared Infrastructure Plan for State Transport Infrastructure* (Victorian Planning Authority, November 2025).

The proposed approach is set out in the BREP Guideline for Preparing Shared Infrastructure Plan for State Transport Infrastructure. The approach involves a complex series of plans and agreements, effectively establishing a bespoke sequence of events, plans, terminology and requirements. The rationale for establishing such a bespoke, novel and complex approach to development contributions, rather than utilising existing planning scheme tools (i.e. the DCP system or equivalent), is not clear.

8 Conclusion

YourLand have significant interest in Amendment C296gben and the long term implications associated with the outcomes for the BREP for the future of Marong. We hope to work with the VPA and other authorities to resolve the issues set out in this submission. YourLand support the process of planning for employment across Greater Bendigo, and agree that it is critical that industrial land supply is planned for across the next 30 years.

In this submission we have raised the following key concerns with the BREP as drafted:

- In relation to the MWFC, there is lack of transparency and strategic justification for its incorporation in Greater Bendigo Planning Scheme as part of this amendment. There is also a lack of certainty in relation to its delivery and its role in supporting the BREP.
- The extent of Industrial 1 Zone proposed results in a lack of nuance and consideration for planned future land uses sitting adjacent to BREP. There is a lack of regard to the impacts of the proposed industrial uses on the planned outcomes for the Marong residential growth areas.
- The planning associated with the BREP fails to integrate appropriately with the Marong Township and Residential Growth Area.
- The BREP Concept Plan lacks sufficient detail for future outcomes associated with land in the northern part of the BREP.
- There is a lack of certainty in relation to the servicing and infrastructure capability of the site to service industrial land in a feasible manner. Drainage infrastructure must be strategically planned and funded to avoid piecemeal outcomes.
- The proposed development contributions arrangement is complex and uncertain.
- The proposed Planning Scheme Amendment does not implement the objectives of planning in Victoria as per the Requirements of the Planning and Environment Act 1987, Section 4(1) and does not propose to introduce provisions that apply fairly and transparently to all affected land owners.

In drawing together the concerns raised on the above topics, we have provided commentary on the proposed planning controls and have made suggestions for their improvement. We would welcome the opportunity to meet with the VPA and other authorities to find an appropriate resolution that is fair and equitable for all landholders.



Attachment 1: YourLand Submission to Amendment C282

04 December 2024

Strategic Planning Unit
City of Greater Bendigo

Dear Strategic Planning Unit,

RE: SUBMISSION TO THE AMENDMENT C282 – GREATER BENDIGO PLANNING SCHEME

YourLand Developments (YourLand) represent the interests of a substantial landholding located in the Marong Township Structure Plan area (approx. 191ha). Some of this land also falls within the boundaries of the Bendigo Regional Employment Precinct (BREP). Our interest in Amendment C282 relates to all of our land holdings within Marong.

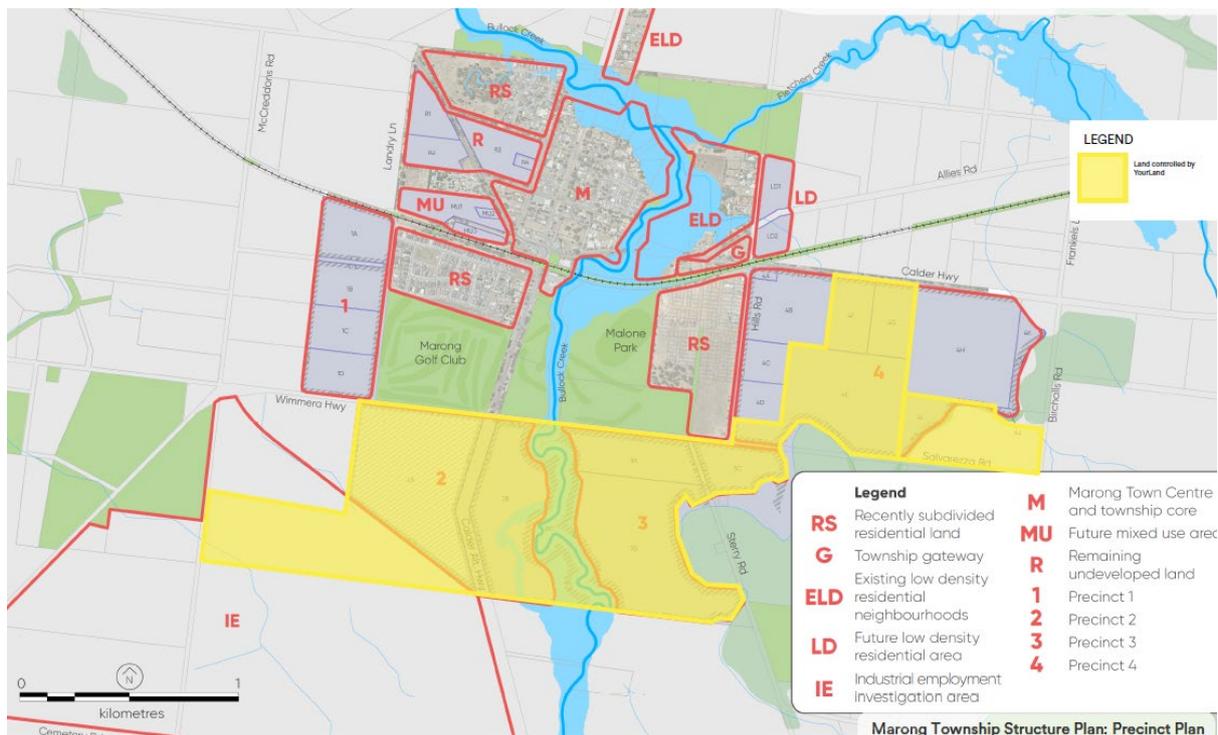


Figure 1. YourLand landholdings

YourLand have been developing high quality residential and industrial land developments in Bendigo for many years. We are passionate about delivering high quality new communities that create opportunities for enriched lifestyles as well as diverse employment opportunities.



Figure 2. Completed YourLand industrial development; Brickworks in East Bendigo

We have read the various Amendment details and documents and appreciate the opportunity to provide feedback and to further engage with Council in this process. YourLand generally supports the implementation of the Greater Bendigo Industrial Land Development Strategy 2024 (GBILDS) into the Bendigo Planning Scheme as proposed by the Amendment. We also support the introduction of the Development Guidelines 2024 as a guiding tool for all future industrial developments and to ensure the standard of development is lifted across the Bendigo region.

We understand that the Amendment is required to provide a strategic framework and roadmap to identify a 30 year pipeline of future industrial land to meet the needs of current and future industry in Greater Bendigo.

We have summarised our key comments and feedback on the Amendment below but welcome further discussions with Council to resolve these matters following our submission:

Greater Bendigo Industrial Land Development Strategy 2024 (GBILDS)

1. The GBILDS document suggests that Greater Bendigo will need an additional 170-270ha of industrial land in addition to existing supply over the next 30 years to meet demand. This number was substantially less in earlier draft versions of the GBILDS however was updated with an increased area when adopted by

Council. We are unclear as to the analysis and data which underpins and justifies the amendments made to the final version of the report.

2. The BREP (294ha) and the Marong Business Park (313ha) have both been designated as future industrial development sites. Overall, this creates an area in excess of what is required to meet future demand for industrial land. Whilst there may be some obstacles to overcome in order to deliver industrial land within the Marong Business Park, it is still considered to be future supply that could be activated.
3. YourLand submit that there will be more than enough land within BREP to ensure that transitional land uses can be explored through the detailed planning of this new precinct. Transitional uses could be in the form of residential or other complimentary employment land uses that act as a buffer between industry and sensitive uses and also compliment the larger scale, more intensive industry that Council is striving to accommodate in the southern portion of the BREP.
4. YourLand do not oppose the designation of BREP within the GBILDS or the Greater Bendigo Planning Scheme however we do say that as part of future detailed planning there needs to be careful consideration of an appropriate transition of land uses in the Marong area to ensure that the objectives of the Marong Township Structure Plan (MTSP) can still be met and interface conflicts can be appropriately managed. The MTSP area has been through a rigorous planning process for many years and should be prioritised over future industrial planning. YourLand submit that the two land uses (residential and industrial) can be delivered together in an appropriate way however we submit that there is not enough emphasis placed on protection of existing residential areas as well as areas that are currently in the rezoning process (to be zoned for residential purposes). There is a focus on ensuring that no new sensitive uses are placed within close proximity of future employment areas however there is little protection for areas that are supported for future residential but not yet developed. This has the potential to compromise the delivery of the objectives of the MTSP area.
5. YourLand suggest that the planning scheme could elaborate further on the need for future industrial areas to accommodate transitional land uses and buffers within these areas (as opposed to addressing the buffers within the residential land). YourLand submit that there is enough area set aside within the BREP to accommodate transitional land uses that would act as a buffer to the planned residential areas to the north and north-east of the BREP. We say that greater certainty in this regard could be considered as part of this Amendment to create certainty for future residential areas where planning is underway.

Greater Bendigo Industrial Development Guidelines 2024

YourLand are generally supportive of the adoption of the Greater Bendigo Industrial Design Guidelines (GBIDG) as part of the Amendment. We support there being greater guidance for industrial subdivision and development and the aim to ensure that future industrial subdivision and development is environmentally sustainable, functional and attractive for business operators, employees, visitors, residents.

We are however unsure as to why the Guidelines would not be applied to the BREP. We are aware that the planning and design of the precinct is subject to a separate planning process however we are unclear as to why this would exempt any future industrial area from having the same guidelines apply to it. It would create greater certainty for the residential areas surrounding BREP to know that any future industrial development will be of high quality and have the same guidelines that apply to all other industrial areas in Bendigo.

In conclusion, YourLand are supportive of Council's proactive approach to planning for future industrial land supply and creating greater certainty through the planning scheme about where that should occur and how. We understand that there will be further opportunities in the near future to be involved in the more detailed planning of BREP however we believe that Amendment C282 has the opportunity create greater guidance and certainty.

[Redacted]

[Redacted]

[Redacted]

[Redacted]