

23/02/2026

Dear [REDACTED]

**Submission to the C296gben
Bendigo Regional Employment Precinct Draft Planning Scheme Amendment**

On behalf of the local members of the Urban Development Institute of Australia (UDIA) Bendigo Chapter, we wish to thank VPA for accepting our late submission to proposed Amendment C296gben.

We greatly appreciate VPA's willingness to engage with local industry and provide the opportunity to discuss important matters affecting the practical delivery of this landmark strategic work for Greater Bendigo. Our committee, made up of local developers and consultants, considers itself a key stakeholder in the delivery of on-the-ground infrastructure, facilities and construction, and we are well placed to review policy and provide practical feedback as to the resulting viability of objectives. As those at the coal face of delivery, local industry practitioners are often the first to experience and understand the consequences of strategic planning. We respectfully request VPA consider the following matters, discussed at our Teams meeting.

We support the intention to rezone and apply a Development Plan Overlay for the site, and acknowledge the value of the project intentions as outlined in the Background Report (p6).

In order to ensure smooth and timely delivery of the necessary infrastructure and lots suitable for use and development, we suggest the following considerations should be reviewed and potentially incorporated, particularly in relation the proposed Schedule to the Development Plan Overlay (DPO34).

Prescriptive MUST

As an overall review, based on our collective dealings with development plan overlay schedules over the decades, we did a control F on the word 'must' within the DPO34 draft – The use of the word 'must' is problematic and severely limits the determining body's ability to apply the principles of 'generally in accordance' and/or to respond practically if policy changes occur between now and future development, which may be as long as 10 years away. We suggest the schedule's practical viability would be improved by replacing must with 'should' or other appropriate discretionary words.

With so much prescriptive guidance, there is a risk that a further planning scheme amendment may be required in the future to adjust the schedule so that decisions can be made in line with whatever contemporary policy, interpretations or procedures are in place across a wide range of referral bodies.

For example, traffic management. What are the anticipated traffic management requirements in the absence of the bypass, which may be up to 10 years away? And if background reports determine that the road alignments etc must be different, does the DPO34 allow for 'generally in accordance' or staging, rather than having to seek a further PSA to update the Concept layout plan in the schedule?

[REDACTED]



Clause 3.0

Clause 3.0 requires a series of agreements relating to shared infrastructure, access points and state infrastructure. These will essentially be with each landowner and potentially require the first owner to pay for the entire infrastructure projects. We note there is the ability for Works in Kind to be utilised, and there is a need for lead developers to be reimbursed by later developers.

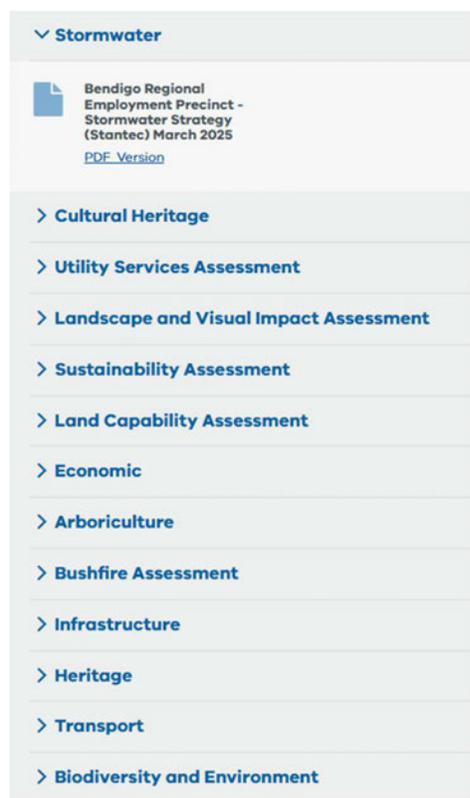
Series of Development Plans

It seems that a series of Development Plans can be generated i.e. lot by lot and each one is to have a Shared Infrastructure Plan. This is likely to lead to confusion and no identification of cost, shared cost or implementation. This has been a typical process in the past, but does not provide much co-ordination. Clear coordination of a Shared Infrastructure Plan is recommended.

Clause 4.0 Requirements for a Development Plan

Background reports

We note that substantial background investigations and reports have already been undertaken to support Amendment C296:



And yet many more are required for approval of a Development Plan, in summary:

1. Site analysis
2. Site masterplan – mentions a Drainage and Stormwater Management Strategy – is that the same as the 4 below?
3. Bushfire Management Plan – seems to require interim arrangements. We suggest including guidance on the need to manage shared defendable space.



4. Integrated Water Management Assessment
5. Layout Plan – is this different from a Masterplan (2 above)?
6. Design Response – responding to Greater Bendigo Industrial Development Guidelines 2024
7. Landscape Concept Plan
8. A plan prepared in collaboration with the Dja Dja Wurrung Clans Aboriginal Corporation – there is no guidance on what this plan is, who assesses it, where the requirement comes from. Such a plan should be guiding the implementation of the DPO in the first place, otherwise there is a risk that the proposed layout cannot be achieved.
9. ESD Assessment
10. Transport Impact Assessment (which may or may not determine that the road alignments should change)
11. Shared Infrastructure plan – what if the plan includes substantial earthworks, trenching or pipes
12. Sodic and Dispersive Soils Assessment and resulting recommendations
13. Flood Riks and Waterway Management Plan – which will additionally take into account climate change and may well reduce RDA and/or result in wholesale layout changes – it is too early in the Catchment Management climate change mitigation process to tell what the likely outcomes will be

All of the comments above support our recommendation that the use of the word 'must' should be reduced. There are still so many unknowns for the area that it is impossible to assume the proposed concept plan will remain as is – despite all the background work already undertaken. More use of 'should' and 'to the satisfaction of the responsible authority' will leave room for negotiation based on whatever the current IDM, policy, DTP settings are at the time of application.

In our view, the DPO34 schedule in its current form is too prescriptive while there are still so many unknowns. Background reports may well change the design and policy needs to allow for that to happen and for decision makers to use discretion in assessing and balancing to achieve objectives.

Layers of investigation

We can see that many investigations have already been undertaken in order to determine the proposed Concept Plan and draft the schedule to the Overlay. Since these investigations have already been undertaken, we are concerned that asking for them to be reiterated as part of a Development Plan approval application is an unnecessary, costly and time-consuming repetition.

It is not clear to us why further investigations of the same thing are required, when those elements have already been thoroughly investigated for the planning scheme amendment. The market will have more confidence in the DPO process and practical viability of achieving construction if reports already undertaken can be relied on for future purposes, rather than individual rafts of reports being redone by every single landowner.

Thank you again for the opportunity to comment, and we look forward to any further discussions if that would be useful.

Sincerely,

