

30 June 2026

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

Dear Sir / Madam,

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

Aster Advisory (Aster) has been engaged by Harwood Andrews on behalf of the Victorian Planning Authority (VPA) to undertake retrospective probity reviews of the planning process followed for the Bendigo Regional Employment Precinct (BREP) project.

Background and Context

The VPA, a statutory authority within the Department of Transport and Planning (DTP) that reports to the Minister for Planning, undertakes strategic planning for the future growth of Victorian cities and regions. This includes delivering place-based plans that provide zoned permit-ready land to enable housing and jobs creation. The VPA was appointed by the Minister for Planning as the Planning Authority for BREP in February 2022. The VPA has been working on the preparation of a planning scheme amendment to deliver the BREP, an employment precinct designated by Plan for Victoria and the Victorian Economic Growth Statement.

In the course of their work, VPA identified a probity risk for the BREP associated with the City of Greater Bendigo (CoGB) dual role as landowner and municipal authority. As a result, the Project Charter and Governance Plan (Probity Plan) was initiated to manage the risk and mitigate any possible impact on the independence of the planning process. A copy of the Probity Plan is available on VPA website.

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

Our Report issued 1 December 2025 related to the retrospective probity review undertaken by us, in accordance with our scope of services, prior to release of the draft Planning Scheme Amendment (PSA) for public consultation. A copy of that Report is available on the VPA website.

This Report relates to the retrospective probity review undertaken by us of the process followed during the period from commencement of public consultation to completion of the Day 01 Part A Submission to the VPA Standing Advisory Committee (SAC) (this review) in accordance with our

scope of services (outlined later in this Report). This review period is aligned with the Probity Plan requirements.

Overview of Process

Set out below is a high level overview of key activities undertaken by VPA (noting some may have been undertaken concurrently) in relation to this review period.

- Obtaining approval from the Minister for Planning to follow a streamlined planning process to progress the draft PSA to facilitate the development of the BREP. This included approval to undertake public consultation and to refer the proposal and submissions received on the draft PSA to the VPA SAC;
- Release of the draft PSA (and associated technical reports) for public consultation on 1 December 2025;
- Conduct of various community and stakeholder engagement activities including (but not limited to):
 - Release of brochure to landowners and occupiers in and around the BREP,
 - Creation of an Engage Victoria web page to provide project information and facilitate information sessions and submission lodgement,
 - Conduct of online and in-person information sessions,
 - Having DTP project team members available to support drafting and lodgement of submissions,
 - Utilisation of traditional and social media to promote the engagement period;
- Closure of public consultation period on 13 February 2026;
- Review and consideration of 26 (twenty-six) submissions from public consultation noting 1 (one) of these submissions was received late (received on 23 February 2026 and accepted for consideration);
- Ongoing engagement with key stakeholders (including landowners, CoGB as Municipal Authority, State Departments and Agencies) in respect to themes arising from submissions as well as revisions to draft PSA (as appropriate);
- Engagement with independent expert contractors to provide advice and input on specific subjects including in relation to independent studies and technical reports;
- Responding to parties that provided a submission;
- Further consideration of submissions, stakeholder feedback, studies, technical reports, government legislation, policies and guidelines;
- Revision of draft PSA and associated documentation (including Shared Infrastructure Plan and Development Plan Overlay);
- Receipt and consideration of further late submission (Submission 27) which was referred to the Committee by DTP (and not referenced directly within Day01 BREP Part A Submission

document);

- Preparation of Day01 BREP Part A Submission to VPA SAC providing overview of process, summary of submissions and Department of Transport (DTP) position. The VPA SAC Hearing commenced on 19 May 2026.

Scope of Services

The focus of the review was to undertake a Health Check as referenced within the Probity Plan. Our services are limited to the review of documented tasks and activities completed during the period from commencement of public consultation to completion of the Day 01 Part A Submission to the VPA SAC. Except for documents provided by VPA, we have not reviewed CoGB retained documentation.

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

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

Approach

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

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

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

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

Statement of Responsibility and Disclaimer

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

Our responsibility is to assist VPA to identify, assess and manage probity risks related to the process such that compliance with relevant policies and guidelines is achieved in all material respects. Any matters raised in this Report are only those which came to our attention while performing our work

and are not necessarily a comprehensive statement of all risks that exist or improvements that might be made.

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

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

Probity Observations

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

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

Yours Faithfully

ASTER ADVISORY PTY LTD

A handwritten signature in black ink, consisting of a stylized, cursive script that appears to be the initials "AG" followed by a flourish.