Aster Advisory Pty Ltd
ATF the Aster Advisory Trust
ABN 576 238 472 79
Suite 9.02, Level 9
607 Bourke Street
Melbourne, VIC, 3000
p: +61 3 8610 5050
w: www.asteradvisory.com.au

20 October 2026

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

Dear Sir / Madam,

BENDIGO REGIONAL EMPLOYMENT PRECINCT (BREP)
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, part of the Department of Transport and Planning (DTP) since 1 January 2025 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 (https://vpa.vic.gov.au/project/brep/).

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.

The draft PSA was released for public consultation from 1 December 2025 through to 13 February 2026. A total of twenty-seven (27) submissions were received. Following consideration of these submissions and other activities, VPA revised the draft PSA and referred a range of issues to the

Standing Advisory Committee (SAC) including infrastructure, amenity and industrial requirements. The SAC Hearing commenced on 19 May 2026. Aster was engaged to undertake a retrospective review of the process followed during the period from commencement of public consultation to completion of the Part A Submission to SAC. A copy of our Report issued on 30 June 2026 in relation to that review is available on VPA website.

This Report relates to the retrospective probity review undertaken by us of the process followed during the period from commencement of the SAC Hearing (19 May 2026) to the drafting of Amendment documents for ministerial approval (end August 2026) in accordance with our scope of services (outlined later in this Report). This review period is aligned with the Probity Plan requirements and represents the final retrospective review required under the Probity Plan.

We note the Amendment documents to deliver the BREP were approved by the Minister for Planning and gazetted on 6 October 2026 under Amendment C296gben to the Greater Bendigo Planning Scheme.

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.

- Submission of Day01 BREP Part A Submission to VPA SAC providing overview of process, summary of submissions and DTP position;
- Involvement in the SAC Hearing from 19 May to 29 May 2026. The SAC Hearing included:
    - Presentation of opening submissions by relevant parties,
    - Expert evidence on drainage, traffic, economics and planning,
    - Further submissions by DTP and CoGB as Responsible Authority,
    - Submissions by landowners, YourLand and CoGB as Landowner,
    - Closing submissions by DTP and CoGB as Responsible Authority;
- Receipt of SAC Referral 18 Report following panel consideration of matters raised during the hearing;
- Preparation of SAC Recommendations and Response Table incorporating DTP level of support for recommendations raised;
- Finalise drafting of Amendment C296gben, and associated documentation including Development Plan Overlay Schedule 34 (DPO34), changes to operational provisions of the Greater Bendigo Planning Scheme, and Guideline for preparing Shared Infrastructure Plan;
- Collation and provision of Planning Scheme Amendment documents for consideration by the Minister for Planning.

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 the SAC Hearing through to completion of Amendment documents for submission for ministerial approval (excluding Ministerial Briefing Paper). 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

