

Project: **Ballarat
North**

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To the Victorian Planning Authority,

RE: Submission to the Ballarat North Precinct Structure Plan (BNPSP)

I write today as a Federation University Masters of Business Administration Candidate who has been completing research into the topic of what is impeding the provision of Appropriate Housing for Older Adults, specifically in the Greenfield areas of Ballarat.

Within my research, I was fortunate to interview local Builders, local Developers, independent, local council and state level Planners, Real Estate Agents and a local Member of Parliament on their experiences and thoughts on this predicament and I feel this data is critical to the BNPSP currently being discussed.

Grounds of Submission:

My research suggests that the targeted diversity and density of dwellings will not eventuate in the proposed form of the BNPSP, resulting in negative outcomes for the community as a whole but especially the Older Adults of Ballarat. I see key flaws in the targets and the proposed methods to achieve these that fortunately, at this stage, have ample opportunity to be corrected.

I offer the relevant findings from my research in dot points as a basis for my following arguments:

- Final housing outcomes in the Greenfields are primarily driven by private property investors.
- Suggestions that for density, land needs to be sold as a 'super lot' directly to builders with strong covenants restricting further subdivision of lower densities, or smaller lots.
- Belief that smaller lots and super lots closer to retail activity centres would encourage larger lots on the outskirts of the target area to balance both the developer's needs for viability and encourage more appropriate dwellings to be built.
- Strong perception from Builders that High Density Zoning would be inappropriate for the Ballarat property market.
- Conversely, Planners and Developers thought it would be a product in demand in the very near future.
- Desire from some interviewees for a planning zone of density mid way between the medium and high that had a *stronger direction to dictate what is built* that will meet 'Medium Density' in the context of Ballarat's changing Demographics that could well also be applied to other regional centres.
- Comments that the greater 'developer' of land, once rezoned, has no responsibilities to meet density requirements when choosing the buyer of a block once the final subdivision has been approved.
- Freestanding low density houses sell for more profit per m2 thus housing diversity and density is avoided by property investors. I.e. If a building permit for this style of dwelling is approved, the opportunity will be taken to 'get away' with building it.
- Council has no control over what gets built on a block as long as it meets building standards. I.e. There are few tools available to Local Council to influence final housing forms in the Greenfields.
- The demand for diverse housing sizes that would naturally encourage density is more likely to exist *after public transport has been provided*. In the context of the provision of appropriate housing for

Older Adults to allow them to age-in-place, there is evidence to suggest that bus routes need to be in operation before this demographic feels safe to move into an area.

- Universal agreement that there is a shortage of smaller housing types, typical of higher density areas, across the Ballarat region and that there is not enough forward planning being done to rectify this.

Comments

Incorrect Density Targets

As per Table 2 taken from the Affordable Housing Needs Assessment resource, SGS Economics have calculated that of the style of housing predicted to be desired (not just affordable housing), 1 bedroom houses equate for 57% of the *total* housing demand in the BNPSP to a total of 3,199. If the demand for 2 bedrooms is included, we now see that 4,006 or 71.39% of the forecast in demand will be for small houses, apartments or units.

Table 2: PSP total housing demand by number of bedrooms

# OF BEDROOMS	HOUSING DEMAND	% OF HOUSING DEMAND
0	0	0%
1	3,199	57.00%
2	807	14.39%
3	822	14.65%
4+	784	13.96%
Total	5,612	100%

Source: (Pg 15, AHNA)

In the Ballarat North Precinct Structure Plan, in Section 3.1.2, Table 4 indicates that the total amount of dwellings in the Area of Increased Density at the estimated Dwellings/NRHa only gives a total of 2,721. This falls well short of the housing demand for just 1 bedroom houses, let alone others that would like to live in these well located areas.

Table 4 Dwelling yields

HOUSING CATCHMENT AREA	NDA (HA)	DWELLINGS/NDHA	NO. OF DWELLINGS
Area of increased density	109	25	2,721
Balance area	165	17	2,802
TOTAL	274	-	5,523
Anticipated population at 2.8 persons per dwelling			15,467

Source: (Pg 17, BNPSP) - Is the Ballarat North Precinct Structure Plan, planning to fail?

In the Area of Increased Density a minimum Dwellings/NRHa ratio of more than 37 would be required to meet this forecast of demand for just 1 & 2 bedroom homes.

Even at this rate, you would be ignoring that many residents will choose to build their 4+ bedroom homes in the well located areas of increased amenity and accessibility as evidenced in the completed developments around Lucas and progress so far within the Ballarat West PSP.

This also negates that in reality, it is only the Central Area of Increased Density that is within the Major Activity Center Catchment that would be well located for the majority of 1 and 2 bedroom homes.

To maintain relevance to the outer urban Ballarat environment, we've also seen in recent history some solid examples that from previous PSPs, that the 'Medium Density' zoned areas around activity centres such as the Delacombe Town Centre and Coltman Plaza in Lucas did not eventuate in the desired ratio of dwellings/ NRHa.

As per the directions within the Ballarat Planning Scheme PPF (11.03-2S) in regards to densities of growth areas, the directions state to:

Deliver residential densities in the growth areas of Melbourne and Major regional cities of an average of at least:

30 dwellings per net developable hectare in locations within walkable distance of existing and proposed activity centres, train stations, major transport routes and public open spaces."

Again, the densities targeted are not even close to what has been legislated nor, from looking at previous results, would be achieved from this low target of dwellings/ NRHa.

And, whilst the framework encourages development to the West, what we have seen over the last decade is that in these areas, density targets are not being reached and areas of diverse housing sizes have not eventuated as were *encouraged* by the PSP. As per the Ballarat Planning Scheme:

'Discourage rezoning of greenfield land that would compete with the key growth area of Ballarat West until additional supply is required'. (PPF - 11.01-1L 26/09/2024 C215ball)

Objectively, this has triggered the point under the Greenfield area strategies that when looking at specifically the current numbers of diverse housing, that *additional supply is required*.

Connection to Services

One key part of the failure of the growth to the West of Ballarat that calls for a rethink is the connection and accessibility to services that cannot be replicated in that area. The Medium Density planned adjacent to the shopping areas, community services and links to public transport, has not eventuated in a sufficiently diverse form that offers an increase of supply in areas that would allow residents to Age-in-Place. It is now too late to retroactively support this due to modern forms of housing typology that extinguishes the chance of infill in the future (due to new homes covering the whole block).

To be noted is that Land Lease Communities (LLC) have been a successful addition to the makeup of our community here and this has offered the perfect option for hundreds of Ballarat's Citizens *who can afford this option*. In their current form, LLCs do not cater for the majority of the demand existing in Ballarat, nor for the future needs of our Community.

Existing Shortages

To 'even out' the lack of Medium Density Residential located in *Appropriate Areas*, a plan needs to be made and legislated to empower and appropriately resource the Ballarat City Council to catch up on supply, let alone deal with the current housing shortfalls of our region. With the majority of the Ballarat West PSP being built out already. Could an equation be set to repair the deficit in density?

My example is that in the context of Ballarat, it was mentioned to me by a member of the VPA that in some

medium density zoned areas, the target of 25 dwellings/ NRHa had only resulted in 15-17 dwellings/ NRHa being built. By my calculations, that would mean that targets potentially need to be multiplied by 1.6 to get the desired outcome in the BNPSP.

The BNPSP is the perfect opportunity for this density to be offered with direct connections to employment, the potential for Public Transport to link the Activity Centres with major hubs like Stocklands Wendouree and links to Melbourne with its proximity to the Wendouree Train Station.

Suggestions

1. The framework used for density targets within the BNPSP is assuming that the area is a 'regional growth' zone. As we are already seeing dense infill in the Miners Rest Village, potentially to a level higher than in the BN area, can this be seen as something closer to needing to be classed as a PSP for an infill area? The demand for smaller housing is evidenced already in its existing and ongoing provisioning in Miners Rest, 8km from the nearest major services hub, Stocklands Wendouree. The major activity centre in the draft BNPSP would only be 3.8km from this shopping centre (less than half the distance!). Does this offer reasoning for the central part of the BNPSP to be considered under a different framework and different density targets should be being used?
2. An innovative way to encourage the market to provide the housing diversity targeted could also be influenced by a hybrid approach to the DCP. If a lower contribution was required for higher density areas and increased for lower density, could this balance out across the whole of the development? Currently at \$67.29 per m2 across the 274 developable hectares, if we set aside 3 hectares for high density and made it DIL free, that would only change the fee to \$68.21 per m2 which in reality, is an unnoticeable amount when land is already selling for \$250,000 for 500m2 in the area. This would also be of benefit to Council as they would collect more rates over time from these higher density areas to compensate for any reduction in the DCP over the first few years of implementation.
3. With the combination of the predicted localised housing demand, existing housing shortages across the Ballarat region and the wonderful connections to nature within the Ballarat North PSP, does this call for a need to create a self sustainable 'village' at the centre of this area? A higher density ring of apartments/ units/ shop-top and middle density construction around the central activity centre with pedestrian connections to the creek, bus connections to Stocklands Wendouree and the Wendouree Train Station giving the village a direct link to the rest of Victoria. This consolidated hub of housing would attract relevant services and conveniences for those looking for a sustainable, livable and super local lifestyle that this Ballarat North village could offer. This could include 4-5 storey creek/ parkside apartments with some levels dedicated to Aged Care, Families above and employment below. Compositions potentially being a mix of Studios, units and '2 up, 2 down' townhouse style apartments. This could be a base for the Innovations the Ballarat City Council have elected to include in the PSP with options for localised power networks and the chance of establishing a Net Zero village. This density would also support the community around it by making retail and services more viable earlier in the development timeline and making the BN area more appealing to future residents.
4. Further to this, does the lack of housing options now provide cause for a master planned community to be built by the Ballarat City Council to ensure these previously ignored densities are met? Some level of partnership that ensures the final say sits with State or Local Council Planning and not with private property investors? Market forces would indicate that so far, we're seeing market failure across the Ballarat Region in regards to the provision of diverse housing options and a reducing amount of affordable choices, thus flagging a need for Government intervention.
5. In regards to meeting many of the stated targets of the BNPSP, higher density housing would naturally lead to greater housing diversity and with that, opportunities for affordable housing to occur without

market intervention from the government, at any level (addressing *Area of Innovation #5 Social and affordable housing form the BNPS*). Higher density housing with connections to new public transport links on Gillies St would increase the viability of bus routes now and into the future of the new suburb. Whilst bus routes are only discussed through this stage of planning, as found in my research, if the public transport comes *after* the houses are built, as seen in Lucas, the driveways don't line up to allow space for a bus stop along key routes. This just reinforces that Public Transport needs to be in place *before* housing is built to prevent this happening or the bus stops are at least constructed and installed before houses, for their future use.

6. The growth in population expected for Ballarat is predicted to be heavily weighted towards the Older Adult demographic and a reduction in the number of residents per household, as such dense and diverse housing is not just required to account for this future growth but to also help in catching up on the shortfall of existing numbers of diverse homes across the Ballarat region. I think it needs to be explicitly acknowledged that this new supply of diverse housing would just be meeting our needs, not offering homes for future growth. The net gain to the region however will be that we are providing a supply of houses that don't currently exist for Older Adults to downsize into and then freeing up existing family homes.

It is *only* at this part of the planning process that we have the potential to take the risks and look after the next generation of residents who don't get to be part of this consultation process as they are yet to join our community. The opportunity to establish a diverse and self-sustaining community, with well connected public transport links, creek views on one side and access to all the required services to live well on the other, doesn't come up very often. I believe that we have here a chance to make a real difference to some deeply ingrained problems, not just of the Housing Market but of to be looking out for Older Adults and allowing them to safely Age-in-Place within the Ballarat Region.

Looking forward to discussing this further,

Yours sincerely,



(BNP PSSR) - [Ballarat North PSP - Pitching Sessions Summary Report - July 2023](#)

(AHNA) - [Ballarat North PSP - Affordable Housing Needs Assessment \(VPA\) July 2025](#)