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Our Ref: **Victoria's 30-year Infrastructure Strategy 2025-2055**

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Dear Infrastructure Victoria,

**RE: SUBMISSION ON VICTORIA'S
DRAFT 30-YEAR INFRASTRUCTURE STRATEGY 2025-2055**

The City of Ballarat (Ballarat) appreciates the opportunity to provide feedback on **Victoria's Draft 30-Year Infrastructure Strategy**. Our submission focuses on the key recommendations and future options that are relevant to Ballarat.

As the third largest regional City in Victoria and as a key regional hub within the Central Highlands, Ballarat plays a vital role in supporting population growth, economic development and service delivery across western Victoria. The city sits at the juncture of Wadawurrung and Dja Dja Warrung country in the west of Victoria.

This submission highlights Ballarat's key priorities, perspectives and feedback on key recommendations within the draft strategy, particularly focusing on enabling infrastructure to support our city's growth. Our focus is on ensuring that the strategy reflects the need to deliver the infrastructure needed to support our community and the future growth of our city.

Ballarat is well positioned to do more of the heavy lifting when it comes to population growth, easing the burden on metropolitan Melbourne, and realising the immense and relatively untapped potential of regional cities to grow our economy and house more of the state's population. But the right amount of growth for Ballarat will be determined by the level of investment from all levels of government into growth-enabling physical and community infrastructure. With increased urban densities proposed by the Victorian Government's Plan for Victoria, there must be consideration and clarity for how both physical and community infrastructure will be augmented to accommodate the projected housing targets.

Critical infrastructure projects for Ballarat include the following major initiatives; a Circular Economy Precinct anchored by a Materials Recovery Facility, which will deliver a sustainable approach to our region's waste management and ensure the value of recyclables is retained locally; Western Victoria Aviation Precinct (Ballarat Airport) upgrades to the main airport runway, which will ensure the full suite of medical transport services can continue to be provided to Ballarat and Western Victoria residents; Dyson Drive duplication, which will add needed capacity to the main north south arterial in the city's key growth suburbs of Lucas and Alfredton; Wendouree Library and Learning Centre which will create a key community hub to meet the needs of Ballarat's new northern growth zone which is expected to be home to 18,900 new residents in the next 10 to 15 years.

While we commend Infrastructure Victoria for its strong emphasis on housing equity, climate adaptation and integrated infrastructure planning, there is still opportunity to further strengthen the strategy's regional focus, improve funding models for local infrastructure and to encourage all levels of government to invest in contributing to the ballooning cost of delivering infrastructure across

Victoria. With rate capping and increasing costs of infrastructure, there is an ever-increasing financial burden on local government to keep up with infrastructure necessary to enable development. Further investment from all levels of government is necessary to ensure that we can deliver housing supply and infrastructure at the same time.

Social and physical infrastructure is critical to supporting vibrant, inclusive communities, enabling economic growth and ensuring residents have equal access to services delivered by all levels of government. This submission provides a response to each of the relevant recommendations below:

Recommendation 1: Build more social housing

Supported with Amendments

Victoria's draft Infrastructure Strategy contains a welcome recognition that social and affordable housing needs to be recognised as part of essential social infrastructure to ensure there is equitable access for all community members. Access to safe, secure and affordable housing is a cornerstone of community wellbeing. In a regional city like Ballarat which is experiencing rapid population growth, rising housing costs, and increasing demand for services, investment in social and affordable housing is critical. We particularly commend the strategy's focus on locating housing near jobs, public transport and essential services, as this is vital to ensuring liveability and connected communities for the future.

While the affordable housing discussion and recommendations are commendable, we offer the following suggestions to enhance their effectiveness and relevance for regional centres like Ballarat.

Adopted by City of Ballarat in August 2024, the **Ballarat Housing Strategy**, outlines a comprehensive framework to manage the city's anticipated population growth and housing needs through to 2041. With an expected increase of up to 55,000 residents, the strategy plans to accommodate approximately 29,000 new dwellings across the municipality. The Housing Strategy aims to balance this growth across new greenfield and infill housing. The Strategy aims to promote a more compact urban form to optimise existing infrastructure through existing residential and urban renewal areas, to increase its diversity and social and affordable housing stock, and, to ensure future urban development responds positively to best practice sustainability and climate resilience outcomes.

The adopted **Ballarat Social and Affordable Housing Action Plan** also acknowledges that housing plays a critical role in health, education, employment and safety outcomes. Not only is physical shelter important, but it must also be adequate (suitable size, warm and dry) accessible (available for low-income households in a location that enables them to get to school, work and community/commercial facilities, and affordable (priced so households are able to meet other essential basic living costs). Increasing delivery of social and affordable housing to meet the demands of a changing community, is paramount to the liveability of the city and to the livelihoods of our community.

Opportunities to strengthen recommendation include:

- x Ensure regional targets for housing supply are equitable and based on a clear methodology where regional centres like Ballarat receive a fair share of housing growth and supporting/wrap around services and infrastructure.
- x Better support local governments to partner with housing providers and developers. Local and the State Government often have surplus land which could be used to increase housing supply. State Government can often rush the sale of surplus land and without engaging in conversations with City of Ballarat to ensure that strategic objectives are met. Equally, local government has surplus land but limited funding or planning mechanisms to co-invest with housing providers to deliver tailored local housing solutions.
- x Further support for ongoing operational funding and support services, including wraparound support services (e.g. support for mental health, family violence victims) to ensure the right housing can be delivered in the areas that can support them.

- x Prioritise investment in physical infrastructure to enable housing supply in regional greenfield growth corridors.

Recommendation 2: Facilitate markets and invest in kindergarten infrastructure

Supported with Amendments

The City of Ballarat supports the recommendation to share information about the supply and demand for kindergarten places. Precinct structure plans need to be reviewed prior to the State Government supporting not for profit providers with funding for infrastructure that is already identified to be delivered by local government.

We are supportive of a diversification of market, but a sector neutral lens should not be applied that results in privatisation of kindergartens. Consideration of the financial implications of attending kindergarten in a long day care (LDC) setting compared to sessional kindergarten needs to be considered when assessing market demand. Vulnerable population groups such as those that cannot access subsidies to reduce LDC fees will be significantly disadvantaged.

Facilitating the market for private investment in kindergarten may lead to saturation of long day care providers. There needs to be consideration beyond infrastructure requirements

- x Culturally and Linguistically Diverse families may be excluded from utilising kindergartens integrated into LDC due to eligibility requirements for childcare subsidy.
- x If we allow privatisation of kindergartens to become the rule, families will be stripped of the choice between sessional kindergarten and kindergarten integrated into long day care. The financial implications of this can be significant.
- x We know that children who attend quality early childhood education have better life outcomes. Whilst investment in the infrastructure to enable these programs is important, equally so is the quality of education and care being provided to children.
- x It is more evident than ever within the ECEC sector that we must prioritise regulation and compliance to ensure these positive outcomes are achieved.
- x Economic viability of oversupply of LDC services and impact on kindergarten places if services close.

Capital investment from NFP kindergarten providers is very difficult and as a result they are heavily reliant on occupying infrastructure through 'peppercorn' lease arrangements.

Recommendation 3: Plan and deliver expanded and new schools

Supported with Amendments

Improved transparency with information about the need and timeline for new schools shared more broadly.

Whilst it may be the cheaper option to expand existing schools, the quality of education and programs should be paramount. Not supportive of the comment that the government should plan for new students in existing schools before building new ones, wherever possible. Double storey portables on former ovals and outdoor play spaces is not a solution.

Recommendation 6: Make government infrastructure more accessible

Supported with Amendments

The City of Ballarat supports this recommendation. The City of Ballarat is strongly committed to universal design principles and accessibility. In alignment with the City of Ballarat Disability Access and Inclusion Plan consultation findings, concerns from the community that were raised related to the accessibility of suitable parking, transport, buildings, public toilets, waste disposal and footpaths. Respondents encouraged consideration of the whole journey from home to venue when assessing accessibility.

Accessible infrastructure not only supports people living with disability but also benefits the ageing population, those living with long term health conditions, parents and carers. 7.4% of the City of Ballarat's population live with a disability, this is higher than the Regional Victorian rate of 6.9%. Additionally, 14.2% of City of Ballarat residents are providing unpaid care to others, and 39.1% of the city's population live with a long-term health condition. Accessible infrastructure and transport is crucial to increasing participation in community life, work, study and quality of life in the City of Ballarat regardless of means and ability.

The City of Ballarat highlights that many key public transport stops remain non-compliant with accessibility standards. The City of Ballarat also advocates for targeted investment in accessible pathways linking public transport stops to key destinations such as hospitals, schools, and civic centres, ensuring that first and last mile connectivity is fully inclusive.

Furthermore, the City of Ballarat encourages that the online information tool and all published accessibility information is compatible with all assistive technologies and is provided in a range of formats to ensure equitable access to this critical information. Additionally, the City of Ballarat encourages all information published is in line with the current Web Content Accessibility Guidelines (WCAG).

Recommendation 7: Rezone locations near existing infrastructure for more home choices

Supported with Amendments

It is acknowledged that the Victorian Government has already progressed work on rezoning pilot activity centres. While acknowledged in the introduction to this submission that Ballarat is well positioned to do more of the heavy lifting when it comes to population growth, any growth must be accompanied by a clear plan for how State infrastructure will be delivered alongside population growth. It is noted that while a Plan Victoria action is to Coordinate public infrastructure and service delivery to support more homes through the development of a Planning Practice Note, State Growth infrastructure and future commitment mapping is a best practice method to support, plan and coordinate infrastructure to meet Victoria's growth projections.

While increased infill housing is supported by the City of Ballarat's adopted Housing Strategy, there must be plan for how existing State infrastructure will be augmented to accommodate a growing population.

Recommendation 9: Run faster bus services, more often, in Victoria's largest cities

Supported with Amendments

Existing bus services and routes within Ballarat have not responded to changing patterns of travel and how local people want to move around their city. As Ballarat continues to rapidly develop, more effective bus services are essential to ensure continued livability of the city as the population grows. A consequence of an underperforming bus network is that traffic congestion naturally increases. This impacts access to education, employment, health and other services for all residents, but felt most acutely within the western growth corridor. Across Ballarat, public transport is unreliable or unavailable and there is poor connections with bus routes that do not take people to where they want or need to get to.

As the healthcare industry is a major employer within the City and Region, reformed and improved bus services that deliver more frequent bus services, including earlier in the day and later in the evenings, would support these vital services which are usually based on shift times.

The City of Ballarat urges alignment between improved service frequency and network redesign. Current routes do not reflect contemporary land use patterns, particularly missing direct links between growth areas, key employment hubs like Ballarat Health Services, Federation University, and the Ballarat West Employment Zone (BWEZ).

The City of Ballarat recommends integrating real-time passenger information systems to improve reliability perceptions and encourage greater ridership.

There is a critical need for improved weekend and evening services to support Ballarat's growing night-time economy and cultural events.

Recommendation 10: Run a new bus rapid transit network

Supported with Amendments

While this recommendation is Melbourne-focused, the City of Ballarat supports exploring Bus Rapid Transit (BRT) style solutions within regional contexts. As Ballarat expands, dedicated transit corridors could provide efficient connections between growth areas, the CBD, and major destinations like Wendouree Station, Federation University, and BWEZ.

The City of Ballarat encourages Infrastructure Victoria to investigate the feasibility of implementing "lite" BRT models in regional cities, including priority lanes, express routes, and improved interchange hubs. A future-proof transport network in Ballarat could benefit from reserving corridors for higher-capacity bus services, reducing car dependency in rapidly developing suburbs such as Lucas and Alfredton.

Recommendation 11: Extend metropolitan trains and run more services in Melbourne's west

Supported with Amendments

As the Ballarat V/line services currently share the train line to Melton, the electrification and quadruplicating of tracks would significantly boost the service capacity and travel speed for Ballarat communities. These step change uplifts would encourage more use of public transport, resulting in significant benefits to the transport network and communities impacted. Additionally, these changes would likely make Ballarat more attractive to new industries, businesses and population seeking access to better services.

Flow on benefits to reduced congestion on the Western Freeway would also increase freight efficiency and benefit those unable to access public transport.

Recommendation 12: Run more bus and coach services in regional Victoria

Supported with Amendments

The current provision of public transport in Ballarat is wasteful, inefficient and not serving the needs of the community which has resulted in low ridership. Buses travel around Ballarat offering a service that does not take people where they want to go in a competitive time or seamless journey – and there has been no real opportunity for review to address the wasteful nature of the current local bus network.

Opportunities to strengthen recommendation include:

- x Review of timetabling, routing and basic network design
- x Improve the lack of incentives in bus contracts to encourage operators to proactively suggest improvements and for DTP to implement change and make improvements to service offerings during contract periods.

The City of Ballarat stresses the importance of cross-regional connectivity. Enhancing coach services between Ballarat, Geelong, Bendigo, and smaller surrounding towns will foster economic links and improve access to education, employment, and healthcare.

There is a growing need for better integration between V/Line services and local bus timetables to minimise wait times and ensure seamless multimodal journeys.

The City of Ballarat also recommends piloting on-demand or flexible transport services in periurban and rural areas surrounding Ballarat, addressing first/last-mile challenges where fixedroute services are not viable.

Recommendation 13: Make off-peak public transport cheaper and simplify regional fare zones

Supported with Amendments

Off-peak fare incentives could stimulate greater use of underutilised services in Ballarat, especially for students, older adults, and part-time workers.

The City of Ballarat recommends pairing fare reductions with targeted marketing campaigns to raise awareness and drive behavioural change in regional areas.

Recommendation 14: Make local streets safer for children and communities

Supported with Amendments

Make local streets safer for children and communities - 30kmh speed limits in local areas is fully supported by current planning and the adopted Ballarat Integrated Transport Action Plan (2020), which advocates for a similar rollout, given the widespread evidence of its benefit for community across the world. This would best be implemented across Victoria as a statewide initiative, rather than it being an ad-hoc approach.

Recommendation 15: Build safe cycling networks in Melbourne and regional cities

Supported with Amendments

Building safe cycling networks in Melbourne and regional cities is a vitally important part of the transport picture. Particularly in regional cities where public transport provision is poor, investment in cycling infrastructure should be considered vital part of the transport system. Victorian Government should commit to fully funding completion of Strategic Cycling Corridors, with ongoing reporting on performance and achievement.

Recommendation 16: Help government schools share their grounds

Supported with Amendments

While the City of Ballarat currently has informal arrangements with some government schools, the fundamental proposition that community sports and active open space should be developed through Joint Use Agreements (JUAs) on State Government (particularly school) land is not supported.

Key reasons for this position:

- x Lack of long-term control: local governments have limited authority over land it does not own, creating uncertainty for long-term planning and investment in community sports infrastructure.
- x Risk of access withdrawal: The school, as landowner, may alter or terminate access arrangements in the future, which could significantly impact community sport participation and facility continuity.
- x Infrastructure Victoria's preference differs: While Infrastructure Victoria promotes JUAs as a way to maximise use of state land, Ballarat believes this is not a sustainable or reliable model for community sport provision.
- x Active open space is accessed for informal uses by community members at times throughout the day meaning that Ballarat's open space assets should be unencumbered from school-based access and hours restrictions.

Ballarat's preferred approach:

- x Prioritise the development of Council-owned active open space in new growth areas.
- x Allow schools to access these facilities during school hours, ensuring shared benefit without compromising the ability to control or the long-term community benefit.

This approach offers a more secure, equitable, and future-proof solution for delivering sport and recreation infrastructure to support growing communities.

Recommendation 17: Invest in maintenance, upgrades and expansions of community health facilities

Supported with Amendments

The City of Ballarat support local community health services with peppercorn agreements to Council-owned infrastructure. Funding to support the expansion of community health facilities and services is important. The emphasis on new sites but also expansions, upgrades, maintenance and minor works is strongly supported to ensure assets are maintained to a high quality, improving asset life.

Recommendation 22: Invest in secure homes for Aboriginal Victorians

Supported with Amendments

The City of Ballarat strongly supports the need for government to invest in more secure homes for Aboriginal Victorians. As part of its adopted Social and Affordable Housing Action Plan, the City of Ballarat has an action to initiate and complete a memorandum of understanding (MOU) with Aboriginal Housing Victoria, local Aboriginal Controlled Organisations and Traditional Owner Groups to better assess the housing needs of local Aboriginal and Torres Strait Islander peoples, and to identify shared actions that will contribute to the goals of Mana-na -woorn-tyeen maartakoort (Victorian Aboriginal Housing and Homelessness Framework). In addition to this, the Action Plan seeks to further Consider the impacts of intersectionality and the needs of women and gender diverse individuals within any MOU developed where appropriate

Recommendation 23: Fund better health and wellbeing infrastructure for Aboriginal Victorians

Supported with Amendments

While not a local government responsibility, it is noted that there is already a strong presence of Aboriginal organisations in Ballarat and further development of extensions to existing services would be encouraged by the City of Ballarat.

Recommendation 24: Reduce greenhouse gas emissions from infrastructure

Supported with Amendments

In 2018 the City of Ballarat acknowledged the climate emergency and the need for urgent action by all levels of government, including local government. Ballarat is taking proactive steps to address climate change, with the City of Ballarat aiming for carbon neutrality by 2025 and a community net-zero emissions target by 2030. This includes reducing greenhouse gas emissions from city facilities and operations and supporting community-wide emission reductions.

The City of Ballarat supports the recommendation reference, the government should work with industry to fast-track low-carbon materials. It should update standards and specifications to reflect required performance. Ballarat suggests this can be strengthened by following the example and lead of the NSW Government.

The NSW Government through the Department of Climate Change, Energy, the Environment and Water (DCCEEW) has run a low emissions specification program to support local government to implement low carbon concrete in their projects. As part of this initiative, DCCEEW collaborated with 10 NSW councils and industry, to facilitate the adoption of low carbon concrete in projects. [Low Carbon Concrete Specifications](#). By advocating for coordination, funding and delivery of new guidelines by State Government, all levels of Government can partner with industry to adopt low emissions building materials faster.

Recommendation 25: Advance integrated water management and use more recycled water

Supported with Amendments

Central Highlands Water manages several wastewater treatment sites in and around Ballarat. Currently, the new suburb of Ballarat North is being planned that sits adjacent to the Ballarat North Wastewater treatment plant. There are obvious benefits and opportunities to utilise recycled water in a new suburb. Barriers exist with regards to the flexibility and funding of integrated water management infrastructure. The funding and delivery of recycled water into the adjacent Ballarat North PSP would help to meet 2030 targets and boost water security for the Region.

Recommendation 26: Better use of government land for open space and greenery

Supported

Recommendation 27: Better prepare infrastructure for climate change

Supported

Recommendation 28: Use new flood maps to revise planning schemes

Supported with Amendments

As captured in the draft Strategy, Climate science is complex and local governments gather and apply flood data in different ways. Additionally, local governments face increasing issues in communicating those results to the community and delays in implementing them into the respective Planning Schemes.

Coordination and implementation of flood studies for all local government areas by the State Government, including regular updates, will enable Councils and communities to make better informed decisions and assess local risks and how to adapt.

There is an urgent need for flood mitigation in Ballarat, particularly within the Ballarat CBD and designated urban renewal areas identified in the recently adopted Ballarat Housing Strategy.

The Need for Flood Mitigation in Ballarat

Recent flood modelling highlights significant flood risks in Ballarat's CBD and Saleyards sites, posing challenges for planned higher-density infill development. As Ballarat intensifies development in urban renewal areas, it is essential that flood resilience is embedded in infrastructure planning.

To align with Plan for Victoria's climate adaptation goals (Pillar 4: Sustainable Environments) and the 30-Year Infrastructure Strategy's flood risk management initiatives, we recommend:

- x Prioritising flood-resilient infrastructure in the CBD and renewal precincts.
- x Integrating stormwater management solutions such as wetlands, retention basins, and permeable surfaces into urban renewal projects.
- x Updating planning controls at a state level to ensure all new developments integrate flood mitigation measures.

Economic and Housing Benefits of Flood Mitigation

Investing in flood mitigation will unlock economic and housing growth opportunities, aligning with the Plan for Victoria's housing targets and economic development initiatives:

- x Enabling Higher-Density Housing: Proactive flood management will facilitate infill development, helping Ballarat contribute to Victoria's overall housing capacity target over the next 30 years.
- x Safeguarding Ballarat CBD's Economic Activity: Protecting businesses, tourism, and employment hubs from flood damage will enhance economic stability and reduce costly disruptions.

- x Encouraging Investment: Managing flood risks makes Ballarat more attractive for public and private sector investment, supporting regional economic growth.
- x Boosting Investment Confidence: Developers are more likely to invest in urban renewal precincts if flood risks are well-managed, improving the feasibility of infill housing projects.

Recommendation 29: Coordinate faster delivery of key energy infrastructure

Supported

Recommendation 30: Improve environmental assessments and site selection for energy projects

Supported

Recommendation 31: Invest in home neighbourhood and big batteries for more energy storage

Supported

Recommendation 33: Develop regional energy plans, guide transition from fossil gas and maintain reliable gas supply

Supported

Recommendation 34: Speed up household energy efficiency and electrification

Supported

Recommendation 35: Prepare public infrastructure sector plans to shape Victoria's cities

Supported with Amendments

This is a great initiative. Given the changing expectations and forecasts on population, a new model of integrated infrastructure planning is needed and this holds great potential. As a self-contained city, Ballarat offers the opportunity for pilot and other opportunities for rolling out these types of new approaches in a staged manner.

Structured and planned implementation of the public infrastructure sectors will be critical to their success. The funding requirements need to be modelled at a regional level and shown to be equitable across the state and provided where the need is the greatest.

Recommendation 36: Reform infrastructure contributions

Supported with Amendments

It is understood that the State Government has commenced a reform of infrastructure contributions that seeks to address the complexities and inconsistencies with the existing system. This is welcomed and very much needed. The current DCP system is too cumbersome and requires significant resources from Councils in the preparation and justification of DCPs.

While contribution reform is welcomed and needed in different development contexts including greenfield and infill development, careful consideration needs to be given to any unintended consequences that may arise from a new system. For instance, a simplified system would bring efficiencies in processes and administration but may contribute to an under provision of funding for the required infrastructure if variations in contexts and circumstances are not taken into account.

Opportunities to strengthen recommendation include:

- x As part of the DCP reform, a simplified system would bring efficiencies in processes and administration but may contribute to an under provision of funding for the required infrastructure if variations in contexts and circumstances are not taken into account.

- x Infrastructure funding is essential to meet the demand created by the increased percentage of infill development. However, this needs to be balanced against the impact that the additional cost burden may have on the feasibility of infill in some areas.

Recommendation 38: Prepare for more recycling and waste infrastructure

Supported with Action Required

The City of Ballarat supports this action, and highlights that it has been working to assist with the delivery of this action by leading a collaborative procurement initiative in partnership with Central Goldfields Shire Council, Golden Plains Shire Council, Hepburn Shire Council, Moorabool Shire