



BALLARAT HOUSING STRATEGY

SUBMISSIONS ANALYSIS SUMMARY REPORT

Proposal prepared by **Hansen Partnership**
for **Ballarat City Council**

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1 INTRODUCTION

Hansen Partnership has been engaged to undertake an independent review of submissions made during the exhibition period of *Ballarat's Housing Strategy 2023-2041* (draft 2023) and associated supporting documentation.

The *Housing Strategy* was prepared internally by Ballarat City Council, supported by external consultants who undertook targeted background analysis and prepared discussion papers, and was exhibited between 4 September and 6 October 2023.

This work does not represent a peer review of the *Housing Strategy*. Rather, it summarises a comprehensive review of submissions that has been undertaken, and provides advice in the form of recommendations to the City of Ballarat as to changes that may be warranted in response to the submissions received.

Recommendations can generally be categorised as significant in terms of the structure and framing of documentation but generally support the approach taken by the City in the ambition and content of the Strategy.

A detailed analysis was undertaken of the written submissions received, but feedback provided to Council via a survey was also reviewed. No commentary is made on the potential overlap between the two forums, nor does this report make any assessment as to the suitability or otherwise of the approach to consultation, and subsequent response level. In addition, feedback provided verbally to Council officers during meetings or other consultation events has not been considered.



2 SUBMISSIONS & SURVEYS

A total of seventy six (76) written submissions were reviewed, with some submitters providing multiple submissions, which were integrated into a single submission where possible.

Of these submissions:

- 23 were received from community members.
- 27 from the development industry (builders, developers, real estate agents, consultants etc).
- 8 from consultants on behalf of landowners.
- 11 from agencies and government departments.
- 7 from community groups.

Submissions varied in length from short emails to multi- page formal reports.

SURVEY RESULTS

In addition to written submissions, a total of 102 survey results were reviewed. While written submissions could address any matters of interest to the submitter, survey results were more targeted, seeking feedback primarily on matters pertaining to the Neighbourhood Character component.

Questions were framed around the following key themes, with responses to this feedback included as part of relevant recommendations in Section 4.

THEME ONE

Preference in terms of support for greenfield vs infill split

Very diverse opinions in response to all questions in this theme. However, the majority of respondent (29.1%) sought a split of 70% infill and 30% greenfield. The second largest group (19.1%) sought a 50 / 50 split as proposed by the Strategy.

THEME TWO

Level of support for the descriptions of the various character areas.

Level of support for the proposed 'preferred character statements.

While it is to be expected that there will be some disagreement in definition of character areas, particularly where areas are reasonably large, for almost all areas, the majority of respondents answered supportively to both questions.

Most of the issues raised in response to these themes related to issues of finer grained mapping detail or boundaries which should be addressed via the alignment of Neighbourhood Character areas and the Housing Strategy as part of the development of a *Residential Growth Framework* (referred to in the Strategy as the *Residential Zone and Overlay Reform Project*).

THEME THREE

Questions were also asked about what various neighbourhoods required or issues that should be considered. Many of the responses are not directly relevant to the Strategy but the ability to provide context for the community in how they relate to housing is flagged in the Recommendations section.

Key issues raised included:

- Need more focus on active transport and need for more footpaths (overwhelmingly highest issue).
- Need greater focus on biodiversity in descriptions, increased tree protection and control over vegetation in areas of high biodiversity value (significant number of submissions).
- Need to move away from sprawling suburban areas, to more compact forms, support hubs of higher density even in growth areas, need for more density.
- Specific design suggestions such as 'garages set back so utes don't block footpaths'.
- A variety of view regarding block sizes (i.e. 'should be more smaller blocks with better design' vs 'should be larger blocks').
- Need for more bike paths and public transport
- Should identify that waterway areas are different and should be recognised in assessment of character.
- Some concern regarding traffic congestion.
- Contrary views on protection of heritage / removal of heritage protections.
- Climate responses needed. Need for less concrete, more urban heat responses alongside density. Net zero housing

THEME FOUR

Types or location for housing?

Encouragement for smaller dwellings - 81.6% of respondents agreed.

There was a very wide range of responses in terms of preferred locations - across whole city and surrounding towns. Saleyards and CBD were the most common. Areas close to the CBD, Miners Rest and Lucas were also common responses. Many responses linked location of housing to transport accessibility, supporting the approach taken by the Strategy

THEME ONE

Social and affordable housing mechanisms

Preferred mechanism = Leadership, partnership, and advocacy (engage with State government to facilitate Social and Affordable Housing), with Direct Investment by City of Ballarat a close second.

3 SUMMARY OF ISSUES

INFILL TARGET & GROWTH AREAS

A large number of submissions spoke directly to the proposed 50 / 50 greenfield / infill target. Many submissions put forward the case that infill in Ballarat was undesirable or unachievable for a range of different reasons. Many submissions referred to an earlier report which had identified challenges in the delivery of infill via traditional property market mechanisms in Ballarat. All submissions sought to have the target adjusted to support increased greenfield development, with some also seeking additional rezonings.

A number of counter-submissions to the above position were also received, highlighting the very significant financial, costs to council and the community in continued urban sprawl, the impacts on biodiversity, agricultural and landscape values as well as climate change impacts.

The main concerns with the target were expressed in terms of the unreliability or infeasible nature of the infill target to be achieved and the corresponding need for more growth areas to be identified and rezoned. The submissions from the VPA, who have been monitoring available land in Ballarat confirmed that there is sufficient greenfield supply for almost 20 years, indicating that there is sufficient capacity within the growth areas alone to provide for identified growth.

BIODIVERSITY & CLIMATE CHANGE

A number of submissions expressed concerns about the failure to integrate consideration of biodiversity outcomes when considering the future of housing in Ballarat. While some environmentally sensitive areas have been proposed as 'minimal change' (a proposal supported by a number of submitters) further attention to the design detailing of housing to ensure that canopy vegetation levels are improved, site coverage allows for other vegetation and other responses to the current biodiversity crisis are integrated. A greater focus on green infrastructure is also urged as part of a response to climate change, which was the focus of a number of submissions.

In addition, a number of submissions queried the preparation of the Housing Strategy prior to a full understanding of flood risks, with a number highlighting that this understanding should be based on future risks under climate change, not just current risks.

INFRASTRUCTURE & ACCESSIBILITY

A number of submissions raised concerns with the way accessibility had been weighted in accessibility mapping (which in turn informs change areas in the Strategy), in particular the weighting of train stations. Numerous submissions sought to ensure that increases in housing provision in these 'accessible' areas were supported by increases in service frequency and expansions on services to support a more sustainable urban form.

A number of submissions also sought to ensure growth was supported by corresponding increases to available services and facilities, including schools, childcare etc. Issues around the cost of infrastructure were also raised in relation to growth areas with some submissions highlighting the significant costs to Council associated with continued expansion of growth areas. Central Highlands Water highlighted the scale of investment needed if new growth areas proposed as a concern.

AFFORDABILITY & DIVERSITY

A number of submissions raised concerns about the Strategy's failure to more explicitly address the delivery of Social and Affordable housing, and to address homelessness. It is understood that council is proposing to prepare a separate Affordable Housing Strategy but this is not clearly articulated in the Strategy. Questions around how Council is / should define affordability in a local context were also raised.

STRUCTURE & EVIDENCE BASE

There were a number of suggestions around additional information that would support use of the document, including from the Department of Transport & Planning. The lack of context and highly summarised nature of the Strategy appears to have led to some misconceptions among submitters.

A common theme across a large number of submissions was around the exclusion of both urban renewal areas and the Ballarat CBD from the strategy, with a number of submissions querying how an overarching understanding of housing could be developed without those areas being included.

Two background reports were questioned by a number of submissions in terms of their accuracy and / or approach adopted. These were the Accessibility mapping and the Capacity Analysis, which was identified in many submissions as being fundamentally flawed (see following issue).

CAPACITY & DEVELOPMENT FEASIBILITY

There were a significant number of submissions which raised concerns with the accuracy and reliability of the capacity analysis as it pertained to available infill opportunities.

As noted, a large number of submissions raised issues relating to the feasibility of infill development. Some of these pointed to a failure of the Strategy to address this in any meaningful manner. A wide range of questions were identified with most being related to how Council was proposing to 'shift' the current trajectory based on the content of the Strategy. Further articulation of the question of infill opportunities and development feasibility is likely to be needed.

While it appears that there is sufficient current supply, addressing this issue more directly is likely to be required to meaningfully respond to the majority of submitters.

HERITAGE & CHARACTER

A number of submitters identified the protection of heritage as needing more consideration. While it was referenced generically by many developers a constraint and a reason greenfield development should be preferred, there were a number of more specific issues identified regarding specific areas in particular, with the Ballarat East area identified for Substantial Change.

SUMMARY OF ISSUE THEMES

Rural residential development opportunities	4
Growth Areas	13
Activity Centres	8
Connectivity mapping	4
Greenfield vs infill	19
Increased density / diversity / small homes	13
Climate change responses (built form, site coverage, Energy efficiency)	8
Infrastructure	8
Ambition	7
CBD	6
Homelessness / Distribution of SAH	9
Biodiversity	5
Implementation / Evidence base	10
Flooding & Stormwater management	3
Rezoning request	7
Industrial land	3
Heritage	5
Construction industry issues	7
Neighbourhood Character	13
Site Coverage	5

4 RECOMMENDATIONS

This section summarises consequential recommendations to the current draft *Housing Strategy* in response to submissions,

These recommendations are not based on a peer review or the views of the author, other than where an assessment of what would constitute a reasonable response to a legitimate issues raised via submissions or survey inputs.

The majority of changes relate to the *Housing Strategy* document itself, but some recommendations also relate to other inputs such as the Accessibility and Capacity analysis.

Recommendation 5 below can generally be summarised as pertaining to 'additional' information or discussion that should be integrated into the Housing Strategy, rather than changes to recommendations or broad approach, other than some minor changes to some of the supporting analysis which may suggest consequential changes.

HOUSING STRATEGY

1 Many of the recommendations regarding the *Housing Strategy* relate primarily to the structure of the document and the **context and background provided** to support an understanding of why the outcomes proposed have been identified. Additional detail about how the Strategy intersects with other Council policy and projects would support greater understanding of why the project has or has not addressed certain aspects of the housing 'picture'. Recommended changes include:

- A more fullsome introduction including identification of the various appendices and how they have influenced the outcomes of the Strategy so intersections are clearer.
- The Strategy should look at the different 'parts' of the housing 'puzzle' fit together. Adjust text of Page 7 and beyond to remove references to the 'exclusion' of areas which are not residential. This relates to recommendation theme 2 below.
- Showing visually how the different reports which provide direction for different areas fit together would be beneficial (eg larger lot development and rezoning / changes to minimum lots sizes = *Rural Living Strategy*, mechanisms and partnerships to support related to SAH = *Social and Affordable Housing Strategy*, zone changes = *Residential Zone and Overlay Reform Project*). For many readers, the Strategy currently seems to have a number of gaps as they are not aware of these other 'puzzle pieces'.
- This change would also support better understanding of next steps proposed by Council, for example, there is a reference on Pg 20 to a "*Residential Zone and Overlay Reform Project*", which has not been introduced prior.

- A number of different Council strategies are shown on Page 8, with reference to Appendix One but nowhere is it articulated how the Strategy supports or intersects with these other strategies. Articulating this would address a number of queries raised through submissions.
- Similarly, a slight expansion of the dot point list of policy considerations to at least articulate the intersection between the 'considerations' listed and the decisions that are to be made via the *Housing Strategy* would be useful for the community's understanding. A new reference in this section to the recent State Govt Housing Statement and its recommitment to a 70/30 split should also be considered.
- The introduction section of the Strategy could also benefit from introducing the different terminology and areas where housing is anticipated to occur (eg growth areas, CBD, urban renewal areas). This will allow a clear link to be provided between Strategy recommendations, and issues related to delivery of housing in each of these 'areas' can be better understood and responded to. A map which identifies spatially which areas are categorised as which would be useful. If known, urban renewal sites should be listed or numbered.
- While the approach to include summaries of key inputs with the reports included as appendices is supported, the current summary of Housing Needs should be expanded to more clearly articulate what the housing needs actually are (i.e. is this about more one bedroom housing, or about more adaptable housing or more accessible housing or housing in different locations?)

2 The second suite of recommendation relates to the scope and framing of the *Housing Strategy*, most notably the approach that has been adopted to separate out both the 'growth areas' and the Ballarat CBD and Urban Renewal Areas. Failure to **provide a comprehensive picture of housing growth and development in the City** through the exclusion of these areas creates some challenges in communicating a coherent vision for the municipality's housing. While it is understood that the 'implementation' via the preparation of a Residential Development Framework in accordance to the relevant Planning Practice Note will be relevant to the 'infill' areas, this is only for one part of the full housing picture in the municipality.

- It is recommended that the current 'supply' discussion should be expanded and split more clearly between Growth Areas, Infill, Urban renewal areas, CBD, and Satellite Townships, all of which have a role to play in accommodating housing. This then provides an improved line of sight to the 'Spatial distribution of residential growth' discussion.
- Consideration should be given to the framing of the supply section as the current inclusion of content relating to both the UDP and work done internally by Council has created some confusion amongst submitters. The use of the heading as a hyperlink also decreases legibility. Breaking up the discussion of supply into the various 'types' of supply may also allow a more nuanced understanding to be developed (for example, infill supply could be split between that available on sites over 1ha vs other lots).
- The structure where growth areas are on a separate 'standalone page' with extremely limited contextual text should also be reconsidered as part of this more holistic approach to identifying supply across the municipality. This will allow integration of content regarding growth area supply flagged in submissions from both VPA and DTP, as well as updated mapping (eg to specify unfunded projects and current staging).
- The strategy also fails to account for growth in the municipality (which is what is required) that may be accommodated in townships with a number of submissions raising Miners Rest as a key area of omission. Consistent with previous recommendations, understanding the likely growth in these areas and their contribution to overall supply is important to understand housing across the municipality.
- Use of common terminology and structure to address, in particular, supply and spatial distribution will greatly enhance the reports user-friendliness.
- Council may also wish to consider a more detailed understanding of the supply vs demand in relation to housing types if this data is available to respond to some submissions (i.e. how many 3+ bedroom dwellings are being delivered vs 1 bedroom dwellings) and how does this relate to the demand identified by relevant background documents. This additional contextual information will support questions raised in submissions.
- The discussion around Infill 'supply' is currently framed around change areas only, which is misleading given typical infill discussions would also include opportunities such as housing in commercial areas, urban renewal areas, and the CBD. The inclusion of considerations such as Industrial land rezoning etc and the anticipated contribution to supply need to be more explicit in the Strategy.
- The current layout of the Strategy means some discussion around different 'change' areas is within the main body of text, and some on separate 'blue' pages with mapping, making it difficult to develop a full understanding of proposed approach.
- The source of statements such as *"up to six storey development in these areas are appropriate"* without any previous reference to built form is also problematic and references to specific heights should either be deleted or improved contextual framing provided. Clarity on the relationship between the heights identified in relation to incremental change areas and potential future zones should also be considered further prior to them being formalised within the strategy (i.e. should the Strategy be flagging 1-2 storey forms if a GRZ without a schedule is likely to be proposed?)

3

It is recommended also that, in line with the two preceding recommendations, that there be some 'reframing' of the Supply and Demand section to support **increased linkages to issues resolution**. The Strategy's articulation of issues or and how the Strategy proposes to address these could be improved. This is of particular concern to a range of stakeholders, and it is recommended that this section of the report be restructured to more clearly articulate the supply and demand issues (as well as relevant figures) across the various categories flagged earlier. This provide space for Council to address (or point to other documents which will address) issues raised in submissions.

4

An improved sense of **connection between the Vision articulated by the document and the Strategy** section and eventual recommendations would also be beneficial. The current lack of connection makes it difficult to understand how the Strategy supports or delivers various aspects of the Vision which was raised in a number of submissions. Potential changes to this 'framing' may support the integration of responses to various issues raised in submissions. This would then support a clearer link to the current 'Recommendations' section

- It is recommended that Council consider reframing the 'Strategy Summary' section (which is not, in fact, a summary, as it introduces new content) based on key aspects of the Vision. This would provide a much clearer line of sight between aspirations and strategies. This would include how the Strategy has considered the following (noting that the strategy itself may not be what address these items):
 - Liveability / sustainability outcomes (numerous submissions raised issues of green infrastructure and climate resilience and how the Strategy delivers on these aspects of the Vision)
 - Accessibility & Integrated land use planning (allowing better articulation of active transport, public transport changes needed to support housing outcomes). This supports responses to numerous submissions which raised questions around the accessibility in growth areas and how the strategy was addressing these areas.
 - Diversity, both of typologies and in building design (noting that this is not yet addressed by Strategy)
 - Social and Affordable Housing, including consideration relating to key worker housing.
 - Heritage protection and explanation as to how increased housing and heritage protection can be balanced.
- Currently, the first discussion of 'Housing Design' comes on Pg 26 as part of the Strategy Summary, but the Strategy has not articulated what the issues area relating to housing design in order to support any 'summary'. The breath of issues addressed under this heading are also extremely limited and further expansion of the role housing design will play in achieving the Vision for housing.

- It is recommended that an additional section be added to the Housing Strategy which explicitly addresses climate change and associated implications for housing. There are a large number of submitters who have queried the extent of various climate change considerations and it warrants further attention via the Strategy. This should also include identification of not just current, but identified future risks in relation to climate change related hazards, such as flooding, bushfire and urban heat. Identification of how housing will be developed in response to this should then be integrated. Current content relating to ESD could be integrated into this new section.

5

While it is noted Appendix 6 contains a list of 'implementation actions', it is recommended that a **discussion on implementation more broadly is included** within the *Housing Strategy* itself. This will allow the articulation of issues associated with delivery of the Strategy (including the important tissues of the 'how' of implementation / mechanisms to be included). In particular, the inclusion of a section addressing the proposed Strategy to increase infill development would be beneficial as many submissions have identified it is currently difficult to understand what, if any, measures Council is proposing to change the current trajectory of housing delivery.

- It is also recommended that the very specific changes to the planning scheme included in the appendix table be deleted to until such time as there is greater clarity regarding amendment content.
- The inclusion of the link between existing strategies and housing, an improved Vision / Strategy connection and an Implementation section in the Housing Strategy will also assist in providing context for the numerous implementation measures included in this table which have no current direct link to the Strategy.

NEIGHBOURHOOD CHARACTER STUDY

There were no significant issues raised in relation to the character areas and their preferred character, with the majority of respondents supporting these in almost all areas. Most issues were at a high level in the context of *"greenfield should be supported as infill will erode neighbourhood character"*. This can obviously, be managed via controls. Where issues were raised in submissions, these relate primarily to the boundaries and inclusion within each area and the relationship between character areas and change areas, as well as the transition between areas. Both these issues can be addressed via the Residential Zone and Overlay Project, which should be made clearer in the Strategy.

It is recommended based on feedback proposed that **a review of the Ballarat East Substantial Change Area be undertaken** to assess the capacity and likely ability of this area to accommodate the scale of development identified for Substantial Change areas.

ACCESSIBILITY REPORT

Changes sought via submissions are generally supported. It is agreed that placing a greater weight on train stations is warranted. These stations will be important nodes and should be weighted higher in terms of accessibility. Accessibility mapping should be rerun with a higher weighting allocated to train stations than currently proposed.

Consideration should also be given to three other matters which were raised via submissions:

- Whether 'access to fresh fruit & vegetables' should be weighted alongside supermarkets
- Whether separation out of child care / kindergartens should be separated out from general 'community facilities; given these are used more regularly than many other facilities and are often a key driver of movement patterns.
- The integration of accessibility mapping for activity centres within growth areas.

Material made public is limited to mapping which is difficult to read and is not provided with any associated explanation of the issues or decisions which underpin assessments etc. This compromises the ability of readers to understand the logic and robustness of the mapping undertaken. Given it is such a significant factor in the Housing Strategy's identification of areas for change, the Strategy would benefit from greater explanation regarding this component of work. Providing higher resolution images would also support legibility.

Potential upcoming changes to State approach to accessibility mapping may also be worth calibrating against the methodology identified for this work.

CAPACITY ANALYSIS REPORT

(Note: the internal housing capacity work identified in the Strategy has not been reviewed.)

The capacity analysis which underpins the Housing Strategy does need to be ground-truthed to provide more robust base for the Housing Strategy. In the first instance, the work should be updated to more comprehensively consider constraints which may exist across the municipality (for example, latest flood modelling, even if this has not yet been subject to an amendment, buffers and heritage). It appears some of these may not have been considered. There also does not appear to be any consideration of servicing in this assessment (ie what is the capacity in 'well serviced' areas vs not so the strategy can address servicing issues if these are required to support housing growth or direct growth away from areas which are too difficult to service.

A number of submissions also questioned the inclusion of land subject to site specific heritage and public land, among a range of 'anomalies' or errors identified. While the Housing Strategy identifies on Pg 13 that these have been excluded, it is recommended that these be rechecked in order to support confidence in the evidence based underpinning the strategy

It is also recommended that this report be updated to both more explicitly consider the different factors influencing different categories of 'available' land. For example could capacity expectation differ based on constraints such as heritage or lot size. This analysis could then support a response by Council to the suggested inclusion of additional steps regarding strategies to support increased infill development.

