City of Ballarat DRAFT Housing Strategy: 2023 – 2041
Committee for Ballarat Response

Committee for Ballarat welcomes the opportunity to provide comment/feedback on the City of Ballarat's Draft Housing Strategy. The Housing Strategy will be critical as the City prepares for its future growth.

Vision

We support the Vision and its focus on:

- Greater housing diversity, including social and affordable housing
- The need for higher density housing in areas that can access services and transport options other than private vehicles
- A higher standard of environmentally sustainable design (ESD)
- Contemporary design that can co-exist and complement our heritage areas.

There is inconsistency in the numbers and targets outlined throughout the document. The Vision defines 29,000 more dwellings to meet our anticipated population growth, yet there are targets for 34,000 additional infill dwellings and 38,000 residential lots on existing and future greenfield Growth Areas.

A clarification of the numbers and targets is required.

An 'Aggregated' Plan – CBD and Urban Renewal Areas?

The Draft Strategy excludes reference to the CBD, Urban Renewable Areas and other non-residential zones. We note the reference to Ballarat Planning Scheme, the developing work on the Ballarat CBD Structure Plan and Urban Design Plan and the previously completed work on the Bakery Hill Master Plan.

Given the strategy recommends *50% of new dwellings be directed to infill and urban renewal locations*, it seems logical to include the CBD and Urban Renewal areas in the Housing Strategy.

Whilst we appreciate the area of planning is complex and involves multiple stakeholders, having several plans and strategies that fundamentally refer to the same thing can make a complex area even more difficult to interpret for those outside of council.

It is recommended that consideration be given to a City-wide Housing Strategy incorporating the policies, plans and strategies that relate to all forms of housing in the City, including the development of land for housing across the CBD, infill, greenfield, brownfield, urban renewal and other areas

In this way, the industry and the community could have one source of reference for the *framework for managing population and housing growth*, as noted in the Strategy's introduction.

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Housing Supply

We note the statistics relating to the percentage split of growth area vs infill building permits. In recent years (and arguably for some time), the balance has been heavily in favour of growth area development. The fact that infill development comprises a significantly smaller percentage of the total number of new housing permits, as noted in the Strategy, is evidence of the challenges facing infill development.

Given the low percentage and the constraints we know exist, it seems ambitious that the Housing Capacity Analysis identifies 23,000 additional dwellings could be built in the six existing residential zones.

Whilst recognising the strategic work outlined in the Implementation Plan (Appendix 6), the strategy needs to be more conclusive in how it will facilitate the acceleration of infill development beyond the exiting residential zones and include other areas such as the CBD, Bakery Hill and potential urban renewal sites.

The Bakery Hill Master Plan was released in October 2019 and yet, other than the redevelopment of the Bridge Mall, there is little evidence of the plan progressing towards its vision. This Master Plan process is an example of the complexity associated with infill and urban renewal development.

To achieve the desired target of *50% of new dwellings being directed to infill and urban renewal* will require a significant acceleration in the approval processes for such developments.

The target will also require effective and constructive partnerships. Potential identification of the sectors who may support the development of projects to achieve this ambitious objective may be of use via case studies and a discussion of development economics. By way of example, Federation University and Grampians Health Services have significant future demands for accommodation, both student and workforce. The Housing Strategy should consider how to work with key partners, including these two, and develop feasible projects that will support the achievement of the overall targets and create catalyst projects.

In relation to Growth Area Supply, we note council's conclusion of potential supply of 38,000 residential lots in existing and future greenfield Growth Area land. This is significant and, if it is to be delivered, will also require extensive and accelerated work in partnership with the development industry.

Precinct Structure Plans, Growth Area Framework plans and the sequencing of infrastructure will need to be accelerated if the strategy's targets are to be met. It will take a whole of industry and community effort to advocate for investment to ensure our new growth areas are ready to meet the needs of our growing community, including access to quality services and amenities that are fundamental to thriving communities.

We support the strategy's recommendation that 50% of new dwellings be directed to infill and urban renewal and that 50% of new dwellings be directed to the Growth Areas.

This will require:

- A significant shift in overcoming the challenges within Council's own planning approvals process to facilitate development

- Improvements in the quality of developments being proposed
- Greater investment from government and the private sector to bring forward the required infrastructure development
- Community support for higher density living and greater housing diversity.

The Strategy's focus on housing diversity is comprehensive.

We support all efforts to increase housing diversity to achieve greater affordability, accessibility and supply.

A further consideration that will enhance housing supply, is for the Strategy to recommend a minimum of 15 years of housing supply (as per State Government policy) at all times. This will ensure Ballarat is well positioned to support high growth opportunities and be able to respond if the infill ambitions are not fully realised.

The recommendation for a minimum requirement at all times, recognises the current reality of the significant lead times require to do urban planning well. As part of its strategic approach, Committee for Ballarat advocates for sustainable development to be at the core of all decision making in relation to our growing population. Mandating 15 years of housing supply (minimum), will provide industry with the certainty and confidence it needs to invest in long term sustainable infrastructure development that our communities need in order to maintain our liveable and vibrant city.

Accessibility and Connectivity

We support the identification of good quality services and amenities as fundamental to socially, economically and environmentally sustainable development.

We do not believe the strategy goes far enough in recommending the establishment of new services and amenities, in the areas identified for growth, including infill, non-greenfield, township and local area plans.

The strategy identifies the current train stations are mostly used for connections to Melbourne with few residents using trains for travel across the municipality. We recommend the Strategy include reference to new train stations and other transport services that will service the new growth areas. This will ensure transport infrastructure is prioritised throughout the planning process.

Whilst re recognise this is a Housing Strategy we do recommend further work on the Integrated Transport Strategy with specific reference to additional railway stations to service Ballarat's increasing population and housing growth.

By 2041, we would like to see intra-city rail connecting Ballarat and the region's growing population with at least two additional stations as part of our current rail infrastructure: one on the Ararat line and one on the Maryborough line. These would service growth to the west and the north, including the townships of Cardigan Village, Beaufort, Creswick, Clunes and others.

Train travel across the municipality and to the surrounding regional towns will reduce congestion by taking cars off the road and must be one feature of the sustainable development we are looking to achieve.

Environmental Sustainability and Biodiversity

The Strategy's reference to ESD could be strengthened. It is vague in relation to the areas of 'best practice' and does not go far enough in relation to energy efficiency in building and design. A stronger statement would include provision of new dwellings to meet a much higher threshold of energy efficiency than is currently the case.

We also note the Strategy strongly encourages the electrification of new dwellings. Item 1.26 in the Implementation Plan outlines a new local policy will be required to 'strongly recommend….' full electrification. This does not go far enough and is not consistent with State Government policy that requires all new homes from 1 January 2024 to be connected only to electric networks, thereby banning new gas connections.

We recommend the Housing Strategy adopts the State Government's directive in relation to no gas connections for new dwellings.

Following discussions Central Highlands Water, we believe the Housing Strategy is an opportunity to highlight the need for climate change impact considerations and adaptation in urban planning for housing supply. We have seen the devasting impacts of flooding and fires across our nation in recent years and future planning decision must be informed by the learnings from these events.

We recommend the Strategy strengthen the appropriate planning provisions to minimise the emerging risks to communities of more severe and frequent climate events due to climate change.

Implementation Plan – Appendix 6

Item 1.11 refers to Growth Areas and greenfield housing. The report concludes no further greenfield land needs to be released until at least 2041. It refers to the timeframe for delivery of the "Decisions regarding the sequencing of these Growth Areas…." as immediate, within 1-5 years. In addition, Objective 4 references "….greenfield residential development occurs in a strategically justifiable, sequential manner…."

To achieve these outcomes for greenfield development and to deliver the proposed 38,800 residential lots, we recommend the strategic and policy work must be prioritised in the more immediate time frame (one to three years) rather than a one to five year time frame outlined in the Draft Strategy.

The inclusion of CDB infill and urban renewal opportunities into the Housing Strategy - as highlighted previously - will supplement the total 34,000 dwellings proposed for the Change Areas and contribute to greater housing diversity.

The statement in the Implementation Plan item 2.12 "*Progress with the Ballarat CBD Urban Design Framework*….." is not ambitious enough to progress the opportunities for infill and urban renewal, such that it can contribute to the targets, nor the desired diversity.

To achieve the outcomes for infill development, we recommend the Implementation Plan include provisions that will accelerate the planning and development of appropriate CBD residential accommodation.

Conclusion:

The Housing Strategy incorporates a Vision for our growing population. The targets are ambitious and will require a whole of community effort to ensure we can deliver greater housing diversity, supply, quality, accessibility, and affordability.

The Housing Strategy must provide the industry and the community with the confidence, processes and outcomes required to accelerate appropriate and sustainable development of housing and the associated services and amenity to meet the needs of our growing population.

Growth is happening now and this Strategy must be considered with a level of urgency commensurate with our growth needs and the ambitious targets that have been set.

Michael Poulton
Chief Executive Officer

10 October 2023