


24/7/2025

Strategic Planning Unit
City of Ballarat
PO Box 655
Ballarat VIC 3353

Subject: Objection to Amendment C234ball – Reduction in Active Open Space and Community Infrastructure

To whom it may concern,

I write to formally object to Amendment C234ball to the Ballarat Planning Scheme, specifically regarding the substantial reduction in active open space, the removal of key community facilities, and the inadequate recognition of these changes' social impacts.

Grounds for Objection

1. Active Open Space Provision Falls Below Benchmark Standards

The amendment reduces active open space from 57.61 hectares (5.26% of GDA) to 36.94 hectares (3.35%), and further down to 18.63 hectares, as acknowledged in the explanatory notes. Even using net developable area (NDA) calculations, this falls short of the Victorian Planning Authority (VPA)'s benchmark of 6%. This represents a systematic erosion of land allocated for structured sport and community recreation — land that is critical to the wellbeing of a growing population.

2. Passive and Encumbered Land is Not a Substitute

The increase in passive open space (to 47.92 hectares) and references to encumbered land (e.g. drainage basins, conservation zones) do not make up for the loss of usable, structured, active recreation space. Passive and constrained land cannot support organised sport, large-scale community events, or structured physical activity — all of which are essential in growth areas.

3. MR Power Park Downgraded from Active to Passive Use

MR Power Park, previously designated a regional active open space, has been reclassified as predominantly passive (13.63 ha), with only 4 ha retained for active use. Additionally, the planned indoor recreation centre at MR Power Park has been removed, despite its earlier inclusion in the PSP and community expectations.

While the indoor centre is proposed to be relocated to Community Hub 3, this shift fragments regional recreation planning, and there is no guarantee of timing, funding certainty, or accessibility. The change is framed as cost reallocation, yet it results in a net loss of function.

4. Widespread Reductions Across Multiple Precincts

The explanatory report clearly outlines additional reductions:

- Community Hub 2: active open space shrinks from 8 ha to 3.5 ha; Early Years Hub removed; library reduced.
- Winterfield North: active space reduced; Early Years Hub and schools relocated.
- Mining Park: reduced from 12.22 ha to 11.13 ha due to drainage expansion.
- Carngham Road, Ballarat West Major Activity Centre and others: loss or relocation of education, early years and recreation infrastructure.

These reductions reflect a system-wide downgrading of community infrastructure, often to accommodate drainage or higher housing density — without full transparency or a clear infrastructure replacement plan.

5. Increased Housing Without Proportional Infrastructure

The explanatory report refers to a “modest increase” in housing yield, yet this comes at the expense of community infrastructure — particularly structured recreation, early years facilities, and indoor sport. No supporting assessment is provided that demonstrates how these trade-offs will meet future demand. This imbalance undermines the stated aim of ensuring infrastructure is “fit for purpose.”

Additional Concerns from the Infrastructure Review

The associated Infrastructure Review confirms:

- A 22.06 ha shortfall in active open space,
- A recommendation to enhance informal recreation to fill the gap — despite these spaces being functionally inadequate for team sport,
- A recommendation to remove the MR Power Park indoor facility entirely and reassign its funding elsewhere.

These responses are not a replacement for structured active recreation and do not satisfy the open space performance benchmarks in either PSP Guidelines or community expectations.

Outcomes from objection

I respectfully request that:

1. The amendment be revised to restore active open space provision to at least meet the VPA benchmark of 6% of net developable area;
2. Due to reclassification of MR Power Park, equivalent active-use land be allocated in line with its original purpose as a regional recreation hub;
3. The indoor recreation centre at MR Power Park be reinstated, or an equally accessible, timely and funded alternative be delivered in the Ballarat West PSP;
4. The cumulative impact of reductions across all precincts be properly disclosed and modelled in terms of sport and recreation demand;
5. Transparent community consultation should outline the real trade-offs between increased density and reduced open space and facilities.

Closing

This amendment in its current form reflects increased density without proportionate delivery of the community infrastructure that makes neighbourhoods healthy, connected and liveable. Open space and recreation are not optional extras — they are fundamental to the social and physical wellbeing of residents.

I urge Council to reconsider these changes and deliver a balanced plan that honours its commitments to residents — current and future.

Thank you for considering my submission. I look forward to confirmation of its receipt and welcome the opportunity for further engagement.

Sincerely,

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