

Our Reference: 2000360
Your Reference: PLP/2013/347



04 August 2025

ACN 006 197 235
ABN 38 006 197 235

Ballarat Office
Suite 3, 180 Eleanor Drive
LUCAS VIC 3350
03 5327 2000

City of Ballarat
PO Box 655
BALLARAT VIC 3353

Attention: Ballarat West

To whom it may concern,

**RE: SUBMISSION TO THE BALLARAT WEST PSP & DCP REVIEW
BALLARAT-CARNGHAM ROAD / MIRELLE DRIVE INTERSECTION DCP ASSESSMENT**

On behalf of Landmack Property Group Pty Ltd, we are pleased to submit the attached formal response (21536T-LET-02-D02) regarding the inclusion of traffic signals at the Ballarat-Carngham Road / Mirelle Drive intersection within the Ballarat West Precinct Structure Plan (PSP) and associated Development Contributions Plan (DCP).

This submission builds upon our initial Submission dated 5 June 2024, which provided a detailed DCP assessment and supporting technical documentation for the inclusion of the intersection upgrade. It also responds directly to the matters raised in Council's Letter to Developers and Landowners (May 2024) as part of the PSP and DCP Review process.

As outlined in the attached submission prepared by Ratio Consultants, the traffic signals at this intersection are a basic and essential piece of infrastructure required to support the safe and efficient development of the Ballarat West PSP. The intersection will play a vital role in providing access to the PSP's industrial precinct, residential neighbourhoods, and emergency services precinct, while ensuring controlled movements onto the arterial road network.

Submitter's Name:

Landmack Property Group Pty Ltd

Contact: [REDACTED]

Contact Address:

[REDACTED]
[REDACTED]

Amendment Number:

C999ball

Grounds of Submission:

Landmack Property Group Pty Ltd opposes the omission of the Ballarat-Carngham Road / Mirelle Drive intersection traffic signals from the revised DCP. This submission provides further justification demonstrating that the intersection upgrade meets all relevant DCP inclusion criteria, including Need, Nexus, Basic and Essential Infrastructure, Transparency, Accountability, and Equity, as outlined in the Regional DCP Toolkit.

Key points in support of the intersection's inclusion are as follows:

- The need for traffic signals is directly generated by the PSP's planned development, including 15,667 dwellings, employment land, and community infrastructure.
- The nexus is clear, with the PSP's growth necessitating upgraded intersection treatments at Mirelle Drive.
- The inclusion of traffic signals satisfies principles of Equity, ensuring infrastructure costs are shared across all benefiting landowners via the DCP, rather than imposed on a single developer.
- Precedent exists, with two new signalised intersections already included in the updated DCP as part of this review (Ballarat-Carngham Road / Presentation Boulevard and Greenhalghs Road / Presentation Boulevard).
- Relevant Authorities support the signalisation, with Regional Roads Victoria having prepared design plans in 2020, and DTP confirming infrastructure provisions for emergency services linkage.

Additionally, the omission of Mirelle Drive from the PSP's traffic modelling represents a significant oversight in the infrastructure planning process. Including the intersection within the DCP will allow for its timely delivery via potential Works in Kind (WIK) arrangements, ensuring a coordinated and equitable outcome.

Given the critical role of this intersection in supporting the PSP's growth and infrastructure network, we respectfully request that Ballarat City Council and the relevant authorities give full consideration to including the Ballarat-Carngham Road / Mirelle Drive traffic signals within the updated DCP.

Should you require any further information or clarification, please do not hesitate to contact me on 03 5327 2000 or via email at [REDACTED].

Regards,

[REDACTED]

[REDACTED]

Project Manager
Beveridge Williams

cc: [REDACTED], Landmack Property Group Pty Ltd
Encl. 21535T-LET02-D02 – Formal Submission Letter
Submission – Ballarat West PSP & DCP Review (Dated 05 June 2024)

3 August 2025

Landmack Property Group P/L
1 Ascot Street South
BALLARAT VIC 3350

Submission to the Ballarat West PSP & DCP Review
Ballarat-Carngham Road/Mirelle Drive Intersection DCP Assessment

Dear [REDACTED],

1. Introduction

Ratio Consultants (Ratio) has been engaged by Landmack Property Group Pty Ltd (Landmack) to review the Ballarat West Precinct Structure Plan (PSP) and Development Contributions Plan (DCP) dated February 2025, which are currently on exhibition.

This letter has been prepared as a formal submission on behalf of Landmack and Beveridge Williams, seeking inclusion of traffic signals at the Ballarat-Carngham Road/Mirelle Drive intersection within the Ballarat West PSP and associated DCP.

A submission was previously made to Ballarat City Council by Beveridge Williams, on behalf of Landmack, in June 2024. The submission sought to include the traffic signal works at Ballarat-Carngham Road / Mirelle Drive as a DCP item. This submission was accompanied by a detailed assessment prepared by Ratio, which concluded that the traffic signal works meet the requirements to be included within the PSP and as a DCP item.

In regards to this submission, Council officers provided the following response:

“As previously advised, the Ballarat-Carngham Rd / Mirelle Drive intersection is not proposed as a DCP project and none of the traffic documentation suggests that it needs to be. The upgrade is driven by DTP and their BCR duplication strategy and/or was considered appropriate to implement as a planning permit condition. It is possible for DTP to request more than the DCP requires. Note that the BCR upgrade itself is not a DCP item, neither is the Pedestrian Operated Signals DTP is considering around the NAC.

One of the principles of undertaking the review is to minimise new infrastructure to reduce the impact of the levy on all landowners. Hence no new projects have been included other than strategic planning costs associated with the review.”

We note that the updated PSP and DCP dated February 2025, still fails to include the traffic signal at Mirelle Drive. We therefore, provide the following submission for further consideration on this matter.

2. Updated Ballarat West PSP and DCP

Contrary to the statement above by Ballarat City Council, two significant transport projects have been included in the updated (Feb 2025) Draft PSP and DCP. These projects convert previously proposed roundabouts to traffic signals, at the following intersections:

- JNC_02 – Ballarat Carngham Road / Presentation Boulevard
- JNC_05 – Greenhalghs Road / Presentation Boulevard

We also note that the residential density in the updated PSP has increased from a projected 14,075 dwellings to 15,667 dwellings¹.

3. ESR Transport Review

On behalf of the City of Ballarat, ESR Transport Planning completed a review of the transport infrastructure included within the Ballarat West PSP in March 2023. We understand that this review informed changes to transport infrastructure projects included within the DCP.

The review did not contain any additional traffic modelling, and instead provided a comparison between existing traffic volumes, SMEC traffic forecasting (completed in 2011) and Aecom VITM modelling (completed in 2016). The review concluded that the modelling presented previously did not provide evidence that the PSP road network was inadequate. It is noted that this conclusion was reached prior to the current increase in residential density within the PSP.

It is understood that these recommendations were informed by design constraints rather than the results of the PSP traffic modelling. Notwithstanding, the two intersections listed above were changed from roundabouts to traffic signals, presumably as a result of the ESR review. Clearly demonstrating that Council has had consideration for changes to transport infrastructure projects included in the PSP.

No modelling to date has been provided as part of the preparation of the PSP which assesses the traffic volumes on Mirelle Drive, or the intersection performance of Mirelle Drive / Ballarat-Carngham Road.

We note that Mirelle Drive is nominated as a 'Key Access Street', with a cross section akin to a Connector Street, which are normally considered as part of any PSP traffic modelling. As such, it is considered to be an oversight to not include any traffic modelling of Mirelle Drive that would have presumably led to the logical inclusion of this intersection as a traffic signal within the PSP.

Traffic analysis was prepared by another transport consultant as part of the Planning Permit Application for the subdivision of the land containing Mirelle Drive, which demonstrated that the existing intersection configuration of Ballarat-Carngham Road / Mirelle Drive was insufficient to cater for the ultimate level of traffic generated by the precinct as contemplated within the Ballarat West PSP. Furthermore, the Ballarat West PSP will result in significant growth in through volumes on Ballarat-Carngham Road, as a

¹ Ballarat West PSP and DCP Plan Review - Project Overview, prepared by City of Ballarat, undated, Para 18.

direct result of the growth within this PSP area, necessitating controlled intersection treatments to facilitate safe and efficient movements to and from the arterial road.

4. Need for Traffic Signals at Mirelle Drive

There is no argument that traffic signals are an appropriate access solution at the Ballarat-Carngham Road / Mirelle Drive intersection.

As noted in our original submission, the upgrade plans for Ballarat-Carngham Road prepared by Regional Roads Victoria (RRV) include signalisation at Mirelle Drive. These plans were prepared by RRV back in 2020.

Signals at Mirelle Drive satisfy the various design requirements for signalisation, including intersection spacing along the arterial road network of Ballarat-Carngham Road.

The traffic signals will serve the wider precinct south of Ballarat-Carngham Road, which includes an emergency services precinct, amongst other land uses.

We note that in correspondence with Beveridge Williams², DTP required the following:

“Ensure sufficient capacity in signal controller (and other signal infrastructure, if relevant) to provide for linking of the future ambulance station.”

Reinforcing the importance of these traffic signals to the development of the wider Ballarat West PSP area.

5. PSP / DCP Infrastructure Inclusion Criteria

Guidance for what infrastructure items should be included in a PSP and associated DCP is taken from the *Regional DCP Toolkit, Development Contributions Information Manual*, prepared by Mesh Planning in 2020 in partnership with the City of Ballarat amongst a number of other regional Councils.

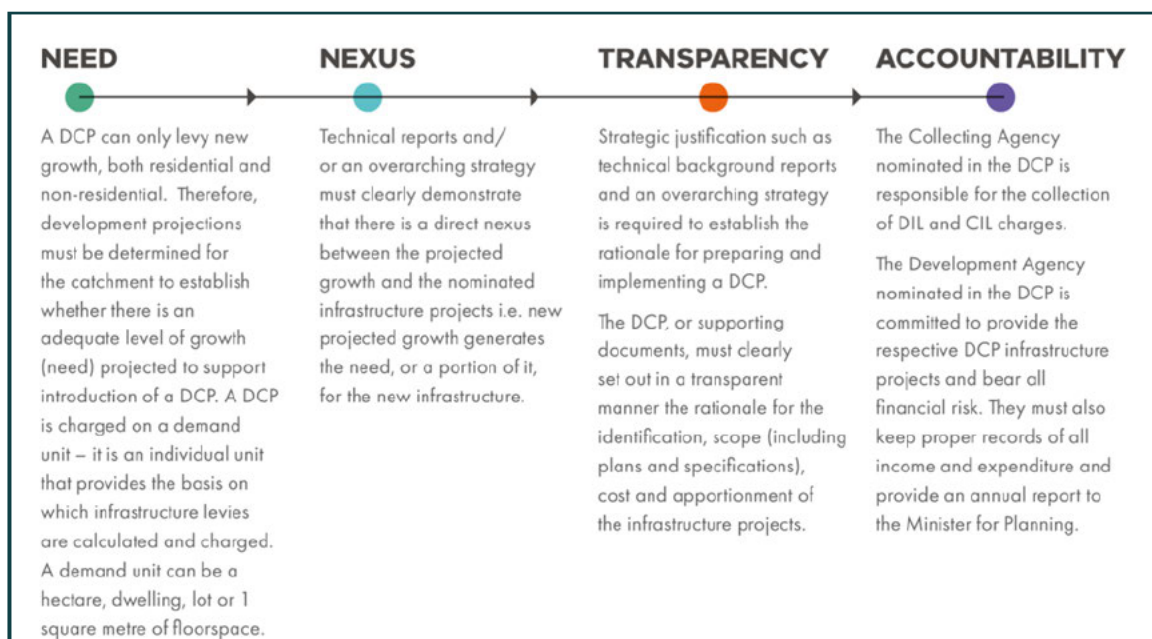
We acknowledge that this toolkit was not available during the original preparation of the Ballarat West PSP, however given the significant review of the Ballarat West PSP and DCP currently underway, we believe that it provides an appropriate reference for determining whether infrastructure items should be included.

The DCP Information Manual states:

“A DCP is a planning implementation tool to enable equitable funding and deliver of higher order infrastructure.”

The four key principles included in the Regional DCP Guide for a DCP item are Need, Nexus, Transparency and Accountability as reproduced below:

² Email from [REDACTED], Associate Director Scoping and Development, Department of Transport and Planning dated 13/8/2024.



In addition to the above criteria, a DCP also needs to consider infrastructure that is **Basic and Essential** to the development of the Precinct.

Although not mentioned in the Regional DCP Toolkit, the concept of **Equity** is an important consideration in this instance.

5.1 Needs Assessment

Clearly the development of the Ballarat West Precinct and the land uses in the vicinity of Mirelle Drive specifically, generate a Need for a traffic signal to be installed at Ballarat-Carngham Road / Mirelle Drive intersection.

The Ballarat West PSP includes around 15,667 new dwellings as well as employment land, education and community facilities. This level of development generates a significant change to road conditions throughout the PSP area. Although Ballarat-Carngham Road could have expected to have some continued growth over time as a regional arterial serving a broader road network function, it would not have necessitated the need for traffic signals at Mirelle Drive.

5.2 Nexus Assessment

Clearly the Nexus for signals at this location is the development of the PSP, however as noted in the text under Nexus in the preceding figure, that the *“new projected growth generates the need, or a portion of it, for the new infrastructure”*

Therefore, even if the traffic modelling had of considered this intersection, and shown that the need for traffic signals were not entirely a result of the PSP growth, it would still have

been reasonable to conclude that the Nexus for requiring these signals was development in the Ballarat West PSP area.

5.3 Basic and Essential

The signalisation of this intersection is basic and essential given:

- The intersection provides an all-movements connection to the only industrial employment precinct of the PSP.
- The existing configuration of the intersection is incapable of safely accommodating traffic generated by the PSP.
- The intersection provides a direct arterial road connection and removes the need for industrial traffic to travel through residential neighbourhoods.
- The intersection facilitates controlled turning movements for heavy vehicle traffic.
- There are limited nearby alternative access routes and intersections onto the arterial road network for motorists to access the residential and industrial uses on Mirelle Drive and surrounding roads.
- There are limited crossing opportunities for pedestrians on Ballarat-Carngham Road to provide connectivity between the neighbourhoods on the northern and southern sides of Ballarat-Carngham Road.
- The intersection will provide a shared path crossing which forms part of a strategic cycling corridor.

On that basis, the Mirelle Drive traffic signal is clearly a basic and essential transport infrastructure item required to support development of the PSP.

5.4 Equity

From an Equity perspective, we note that traffic signals are standard DCP items and are included regardless of the road typology they serve. Noting that traffic signals are generally only warranted on higher order road where traffic volumes require a safe and efficient access solution.

The Equity of requiring one developer to fund traffic signals at Ballarat-Carngham Road / Mirelle Drive intersection in addition to contributing to the wider infrastructure items included in the DCP appears to be inequitable based on the information I have been provided.

If the traffic signal was included as a DCP item, then Landmack (or another developer) would be able to undertake a Works in Kind (WIK) arrangement to construct the traffic signal in a timely and equitable manner.

6. Conclusion

In conclusion the Need for traffic signals at Ballarat-Carngham Road / Mirelle Drive intersection is well established and supported by the Relevant Authorities.

The Nexus between this traffic signal and the development of the Ballarat West PSP is clearly apparent and directly related to the intensification of uses along the Ballarat-Carngham Road corridor as well as through the Precinct more broadly.

Even if growth along Ballarat-Carngham Road warranted the upgrade of the arterial road, there would be no need for traffic signals at Mirelle Drive without the Ballarat West PSP facilitating development in the Precinct area.

Traffic signals are significant transport infrastructure items that are included in DCPs regardless of the road typology they serve, noting that traffic signals provide wider benefit to the connectivity of the broader road network as well as safe crossing opportunities for pedestrians and cyclists.

The traffic signals will not only serve the proposed industrial area and development within the PSP more broadly but will also facilitate safe and convenient access to the emergency services taking direct access to the arterial road network from this traffic signal.

Furthermore, we note that the updated PSP / DCP includes two new traffic signals, so clearly the scope of this request is not beyond the considerations of the current review.

On that basis of the above, we kindly seek inclusion of the traffic signals at the Ballarat-Carngham Road / Mirelle Drive intersection within the updated Ballarat West PSP and associated DCP.

Should you have any questions on the above, please contact [REDACTED] or the undersigned on [REDACTED].

Yours sincerely,

[REDACTED]

[REDACTED]

Director: Transport
Ratio Consultants