Moorabool Planning Scheme

Amendment C099moor

Planning Permit Application PA2020242

Explanatory Report

Overview

The amendment rezones former agricultural land around the intersection of Halletts Way and Adelong Way, Bacchus Marsh (Lot A, Figure 1) from Farming Zone to Neighbourhood Residential Zone – Schedule 9 (NRZ9) to facilitate the coordinated subdivision and development of the site for residential or community use.

It deletes the current Design and Development Overlay – Schedule 2 (DDO2) and applies the Development Plan Overlay – Schedule 8 (DPO8) to this land.

The amendment also rezones adjacent strips of land, bordering the Werribee River from Farming Zone to Public Park and Recreation Zone (PPRZ).

The amendment is a combined planning permit application and planning scheme amendment under section 96A of the *Planning and Environment Act 1987* and includes a planning permit application to subdivide Lot A into five lots.

Where you may inspect this amendment

The amendment can be inspected free of charge at:

- Moorabool Shire Council website at https://www.moorabool.vic.gov.au/Buildingand-planning/Planning-for-the-Shires-future/Planning-scheme-amendments
- During office hours at the following places:
 - o Moorabool Shire Council, 15 Stead Street, Ballan
 - Darley Civic and Community Hub, 182 Halletts Way, Darley
 - Lerderderg Library Customer Service, 215 Main Street, Bacchus Marsh
- Department of Transport and Planning website at www.planning.vic.gov.au/public-inspection.

Submissions

Any person may make a submission to the planning authority about the amendment. Submissions about the amendment must be received by 4 May 2025.

A submission must be sent to:

Strategic Planning, Moorabool Shire Council

By post: PO Box 18, Ballan, Vic 3342

In person: 15 Stead Street, Ballan, or any Moorabool Shire Council office

By email: info@moorabool.vic.gov.au

Online: using the submission form on the Have your say page for C099moor

Panel hearing dates

In accordance with clause 4(2) of Ministerial Direction No.15 the following panel hearing dates have been set for this amendment:

Directions hearing: 11 August 2025Panel hearing: 8 September 2025

Details of the amendment

Who is the planning authority?

This amendment has been prepared by the Moorabool Shire Council which is the planning authority for this amendment.

The amendment has been made at the request of Beveridge Williams & Co Pty Ltd.

Land affected by the amendment



Figure 1: Map of the subject land and surrounds

The amendment applies to 4.7ha of land outlined in yellow in Figure 1. This area consists of several parcels, around Halletts Way and Adelong Way, and is bordered by the banks of the Werribee River.

These parcels are described as:

- Lot A on Plan of Subdivision 821090T, Werribee Vale Road, Bacchus Marsh (3 parcels forming 2.61ha in extent, owned by Plenty Property Pty Ltd).
- Lot RES1 on PS742687 (owned by Moorabool Shire Council).
- Crown Allotments 2035 and 2036, Township of Bacchus Marsh, Parish of Korkuperrimul (Crown land forming part of the Werribee River corridor, owned and managed by DEECA).

The amendment is a combined planning permit application and planning scheme amendment under section 96A of the *Planning and Environment Act 1987* (the Act). The planning permit application applies to Lot A on Plan of Subdivision 821090T.

The land affected by the amendment is currently located within the Farming Zone (FZ), Design and Development Overlay – Schedule 2 (DDO2), and partially covered by the Environmental Significance Overlay Schedule 2 and 8 (ESO2, ESO8), and the Land Subject to Inundation Overlay (LSIO).

The land sits adjacent to the Underbank residential estate and close to the Stonehill residential estate. The area surrounding the land is mostly zoned General Residential Zone 2 and features major creek lines and distinctive undulating slopes.

The Werribee River runs to the south of the subject land making the southern portion of the land prone to inundation (covered by the Land Subject to Inundation Overlay).

What the amendment does

The amendment rezones the land at Lot A on Plan of Subdivision 821090T, Werribee Vale Road, Bacchus Marsh (located at the intersection of Halletts Way and Adelong Way, Bacchus Marsh) from Farming Zone to Neighbourhood Residential Zone – Schedule 9. It also deletes the current Design and Development Overlay – Schedule 2 (DDO2) and applies the Development Plan Overlay – Schedule 8 (DPO8) to this land.

The portion of the land affected by the Land Subject to Inundation Overlay will be rezoned to NRZ9. A future amendment will be prepared to change this land to the Public Park and Recreation Zone once ownership transfers to Moorabool Shire Council as indicated in the draft concept plan (Figure 2) and as required by proposed permit conditions.

The amendment also rezones strips of land, bordering the Werribee River from Farming Zone to Public Park and Recreation Zone. These parcels include Lot RES1 on PS742687 (owned by Moorabool Shire Council) and Crown Allotments 2035 and 2036, Township of Bacchus Marsh, Parish of Korkuperrimul (Crown land forming part of the Werribee River corridor, managed by the Department of Environment, Energy and Climate Action (DEECA)).

Specifically, the amendment makes the following changes to the Moorabool Planning scheme:

Zoning Maps

Amends Planning Scheme Map No. 34 and 36 to rezone Lot A on PS821090T from Farming Zone (FZ) to Neighbourhood Residential Zone – Schedule 9 (NRZ9), and rezone Lot RES1 on PS742687, Crown Allotment 2035 and Crown Allotment 2036 to Public Park and Recreation Zone (PPRZ).

Overlay Maps

- Amends Planning Scheme Map No. 34DDO and 36DDO to delete the Design and Development Overlay – Schedule 2 (DDO2) from Lot A on PS821090T.
- Amends Planning Scheme Map No. 34DPO and 36DPO to apply the Development Plan Overlay Schedule 8 (DPO8) to Lot A on PS821090T.

Planning Scheme Ordinance

- Inserts a new Schedule 9 to Clause 32.09 (Neighbourhood Residential Zone).
- Inserts a new Schedule 8 to Clause 43.04 (Development Plan Overlay).
- Amends Schedule to Clause 35.07 (Farming Zone) to reflect the Farm Zone extent in the included map.

Planning permit PA2020242 seeks approval for:

A five-lot subdivision with all lots to be located within the NRZ9.

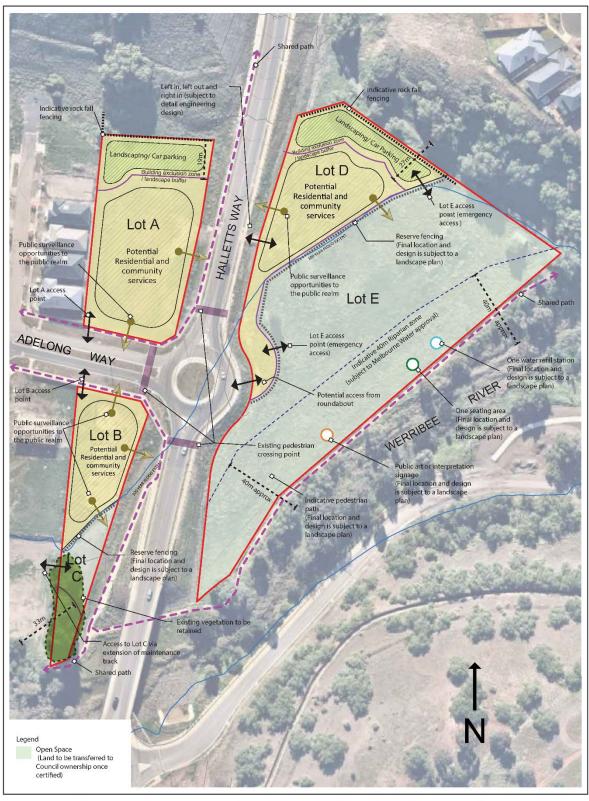
The amendment is a combined planning permit application and planning scheme amendment under section 96A of the Act.

The proposed planning permit application subdivides Lot A on PS821090T into five lots (into lots A,B,C,D,E as shown below in Figure 2).

Key points of the permit application include:

- Lots A, B, and D: These lots support standard and medium-density residential development and potential for non-residential land uses permitted under the zone.
- Lots C and E: These lots will be public reserves vested in the council to protect environmental values and manage inundation risk.
- Flexibility and Future Uses: The subdivision is designed to maintain the site's flexibility while preparing for future urban land uses. There are no development applications or proposals for land uses at this stage.

The subdivision design responds to the land's environmental features and fragmented layout, effectively ensuring that future developments can be considered within the zones. The planning permit is attached as a separate document to this Explanatory Report.



HALLETTS WAY AND ADELONG WAY INTERSECTION AREA CONCEPT PLAN

Figure 2: Draft Development Plan Overlay Concept Plan

Strategic assessment of the amendment

Why is the amendment required?

The amendment is required to guide and facilitate the coordinated subdivision and development of the subject land for future development, and support continuity of public open space along the Werribee River corridor.

The amendment includes the rezoning of Farming Zone (FZ) land to Neighbourhood Residential Zone Schedule 9 (NRZ9) to provide land supply. The NRZ schedule's objective is to integrate future development with the emerging and desired streetscape character and development pattern of the neighbourhood, and protect and enhance the Werribee River. The Development Plan Overlay Schedule 8 (DPO8) is being applied to the Neighbourhood Residential Zone Schedule 9 (NRZ9) to support the vision of providing open streetscapes and passive surveillance through fencing design and to require defendable space setbacks for bushfire, safe access and enhancement and protection of the Werribee River.

Land rezoned to the Public Park and Recreation Zone (PPRZ) is currently in public ownership and provides further protection of the Werribee River.

The change in use of the land will have minimal impact on the availability of agricultural land in Bacchus Marsh. It is a small parcel surrounded by residential development which limits potential agricultural uses. The construction of the Halletts Way connector road resulted in significant soil disturbance and fragmentation, and the resultant small segments of farmland would be difficult to manage productively due to being isolated from nearby farmland and associated infrastructure, difficulties with machinery access, offsite amenity impacts, security and weed management.

The amendment is required to implement the principles of the *Bacchus Marsh Urban Growth Framework* (BMUGF), VPA, 2018, specifically 'to plan for new residential areas', and 'to protect features of natural and built environmental value'.

The use and development of the land for urban, environmental, and recreational purposes is consistent with the strategic goals for land within the Bacchus Marsh settlement boundary as outlined in the Moorabool Planning Scheme and Plan Melbourne. This site is surrounded by growth precincts identified in the *Bacchus Marsh Urban Growth Framework* and in the Planning Scheme at Clauses 02.03-1 (Settlement) and 11.01-1L-02 (Bacchus Marsh).

Central Highlands Regional Growth Plan (CHRGP), 2014 identifies Bacchus Marsh as the second largest town in the region and earmarks it for significant growth. This includes transitioning Bacchus Marsh from a commuter centre to a self-sustaining employment town. The plan identifies the following future directions for Bacchus Marsh:

 Support Bacchus Marsh as a regional centre and key growth location for the peri-urban part of the Central Highlands.

- Maintain the character and form of a distinct regional settlement, separated from Melbourne's western growth corridor.
- Encourage the provision of social, service and transport infrastructure to support significant growth.
- Provide a balanced approach to growth by promoting a range of local employment opportunities as an alternative to Bacchus Marsh's role as a commuter centre.
- Encourage the development of Bacchus Marsh to protect surrounding regional environmental, heritage, landscape, resource and agricultural assets and consider natural hazard. (page 51)

This combined permit and amendment responds to the Land Subject to Inundation overlay by limiting development in areas at risk of flooding.

How does the amendment implement the objectives of planning in Victoria?

The amendment implements the objectives in section 4(1) of the *Planning and Environment Act 1987* (the Act). In particular, it supports the objectives:

a) to provide for the fair, orderly, economic and sustainable use, and development of land;

The amendment will result in the fair, orderly, economic and sustainable use and development of land by applying the Neighbourhood Residential Zone Schedule 9, Public Park and Recreation Zone and Development Plan Overlay to address relevant issues and meet the needs of the existing and future community and environment.

b) to provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity;

The amendment identifies and protects local environmental features by retaining the Environmental Significance Overlay Schedules 2 and 8 and the Land Subject to Inundation Overlay. The amendment rezones public reserves adjacent to the Werribee River to the Public Park and Recreation Zone to protect the natural functions of the floodplain from unsuitable development.

c) to secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria;

The amendment introduces a Development Plan Overlay, with a focus on fostering a safe and connected community. This will be achieved through:

- Identifying new residential land to accommodate growth and provide housing options.
- Implementing structure and settlement planning principles with requirements for integral background documents to mitigate traffic, bushfire, access, urban design and biodiversity issues.

 Establishing strong linkages and creating robust connections to existing and proposed open spaces and key places, such as the local train station and recreation reserve, to enhance accessibility and encourage community interaction.

How does the amendment address any environmental, social and economic effects?

Environmental Effects

The amendment is not expected to result in any significant environmental effects. The historical use of the site was for agriculture which has potential for land contamination and so a Preliminary Site Investigation was conducted (PSI). The PSI found that site soils were considered acceptable for re-use onsite and did not report exceedances of human health and environmental criteria in any contaminants of potential concern.

The Environmental Significance Overlays will continue to protect the identified environmental features of the land, particularly riparian areas and associated vegetation including River Red Gums, and will ensure that development applications consider environmental impacts. The applicable overlays are the:

- Environmental Significance Overlay Schedule 2. This overlay seeks to protect waterways and catchments, and associated vegetation, within the Moorabool Shire.
- Environmental Significance Overlay Schedule 8. This overlay seeks to protect River Red Gums in the Bacchus Marsh Valley.

The retention of the Environmental Significance Overlays will ensure that applications for development assess and respond to biodiversity within the site and surrounding area. Particularly, the Environmental Significance Overlay – Schedule 2 will continue to protect the Werribee River, which supplies the wider Bacchus Marsh agricultural areas, including the Bacchus Marsh Irrigation District.

In terms of cultural heritage, due diligence undertaken by Heritage Insight found that significant ground disturbance was evident during multiple phases of the land i.e. the historical use of the land as a vineyard, and the construction of Halletts Road. The area of potential cultural heritage sensitivity within the study area has been subject to significant ground disturbance and, in accordance with regulation 26(2) of the Aboriginal Heritage Regulations 2018, is therefore no longer considered an area of cultural heritage sensitivity.

Social and Economic Effects

As the land is no longer suited for productive agricultural practices, the amendment will facilitate the supply of urban land within Bacchus Marsh for residential development, consistent with the Moorabool Planning Strategy. The amendment will also contribute to the following:

Increased housing availability and diversity.

- Increased provision of housing for people living regionally and working in Metropolitan Melbourne, as sought by Plan Melbourne.
- Potential community-based land uses to support the growth in the newly developing greenfield areas.

By facilitating the residential development of the land, the rezoning will result in additional population accommodated within Bacchus Marsh.

The rezoning will provide the potential for community services for the residents within emerging greenfield areas such as the Underbank and West Maddingley Development Plan areas.

The rezoning will also facilitate the open space connectivity to the Werribee River through the proposed Public Park and Recreation Zone which will support the development of shared paths and revegetation to connect the green spaces and protect the river surrounds.

Does the amendment address relevant bushfire risk?

The amendment satisfies bushfire policy in Clause 13.02 of the Planning Scheme because any immediate approach by bushfire would be along the narrow, winding vegetated corridor of the Werribee River and the associated escarpments in the immediate vicinity of the site. A fire burning through these areas is unlikely to achieve the scale and intensity envisioned by the AS 3959-2018 model. The *Bushfire Development Report (Terramatrix 2022, updated February 2025)* identifies that a comprehensive local road network provides ready access to lower threat areas, including areas immediately to the north, south and west. The report also concludes that the proposed rezoning, appropriately prioritises the protection of human life. The draft concept plan prepared for the subject land demonstrates the setback requirements for the BAL 12.5 rating. The amendment was referred to the relevant Fire Authority, the Country Fire Authority (CFA), due to the subdivision of land into five lots and Bushfire Prone Area designation.

The future development of the site will be subject to building regulations to ensure that applicable BAL ratings are addressed at the building approval stage.

The Country Fire Authority (CFA) acknowledges that the proposed location is likely to be suitable for development, provided that the necessary bushfire protection measures are incorporated into the proposal. The CFA agrees with the setbacks identified in the Bushfire Development Report as follows:

- 19 metres from the grassland vegetation to the north,
- 27 metres from the scrub vegetation to the northeast, and
- 33 metres from the woodland vegetation to the south and southwest.

The Development Plan Overlay requires that a future Development Plan detail how use and development will provide relevant building envelopes for defendable space, ongoing management and maintenance of the reserves, and revegetation along the

riparian corridor by public agencies.

The CFA also require that any vulnerable uses (if applicable) such as medical centres or childcares will need to be captured in a final bushfire assessment to be prepared as part of the Development Plan approval.

Does the amendment comply with the requirements of any other Minister's Direction applicable to the amendment?

The amendment complies with the requirements of the *Ministerial Direction - The Form* and Content of Planning Schemes (Section 7(5) of the Act).

Direction 1: Potentially Contaminated Land

The amendment complies with *Ministerial Direction 1 (Potentially contaminated land)*. The site was historically used as a vineyard and for agriculture. Following the construction of Halletts Way and Adelong Way, the site was divided into three by the roads, and agricultural uses ceased.

A Preliminary Site Investigation has been undertaken for the subject land by Tonkin and Taylor Pty Ltd (July 2023) due to indicators of potentially contaminating activities and impacts such as historical use of agricultural and residential land, minor quarrying, and filling. The PSI was updated in July 2023 following Council's request for further information including the EPA Audit conducted to the north of the site and a review of the site contamination potential assessed against *Planning Practice Note PPN30: Potentially Contaminated Land* (July 2021). The investigation did not find contaminations exceeding human health criteria and determined that the soil is suitable for re-use on site, and to be classified as fill material if required to be disposed offsite.

The previous uses do not meet the criteria for Potentially Contaminated Land as defined in the Ministerial Direction.

Direction 11 – Strategic Assessment of Amendments

The Amendment complies with *Ministerial Direction No. 11:* (Strategic Assessment of Amendments) under Section 12 of the PE Act. The amendment is consistent with this direction which requires a comprehensive strategic evaluation of a planning scheme amendment and the outcomes it produces. This explanatory report provides this evaluation of the amendment.

How does the amendment support or implement the Planning Policy Framework and any adopted State policy?

The Planning Policy Framework (PPF) sets out the broad parameters of planning policy in the state. The proposed amendment is consistent with the relevant policy objectives of the PPF. These policy objectives are considered below:

Clause 11-01S Settlement

The amendment is consistent with the objective of this Clause 'to facilitate the sustainable growth and development of Victoria and deliver choice and opportunity for all Victorians through a network of settlements.' The proposed rezonings will result in additional land for community or residential purposes and offer a high-quality public realm and open space. The amendment facilitates provision of residential land within the identified urban growth area of Bacchus Marsh.

Clause 11.01-1R Settlement – Central Highlands

Seeks to 'direct growth to well serviced settlements with good access to Melbourne or Ballarat, particularly Bacchus Marsh, Ballan, Creswick, Clunes, Beaufort and Smythesdale'. The rezoning will provide additional residential land to accommodate the increasing population of Bacchus Marsh.

Clause 11.01-1L-01 Settlement in Moorabool and Clause 11.01-1L-02 Bacchus Marsh

The amendment facilitates provision of residential land within the identified urban growth area of Bacchus Marsh.

Clause 12.01-1S Protection of biodiversity

The amendment does not propose to remove the environmental overlays applicable to the site, which protect waterbodies and River Red Gums within Moorabool Shire. The retention of the applicable overlays will require all permit applications to consider biodiversity values within the site and surrounding areas. The proposed development is not expected to impact areas of significant biodiversity.

Clause 12.05-2R Landscapes – Central Highlands

The land is located within an area identified for urban development as part of the wider Bacchus Marsh settlement area and the proposed rezoning of the land will create consistent zoning within a residential area. The land does not form part of a settlement break.

Clause 13.02-1S Bushfire Planning

The amendment meets the requirements for bushfire protection, minimisation and management. The rezoning of land to the Neighbourhood Residential Zone – Schedule 8 accords with the zoning of surrounding land, which has largely been removed from the Bushfire Prone Area due to the reduction of hazards coinciding with clearing of land and urban development.

The land will remain subject to the Bushfire Prone Area until such time that hazard removal is deemed sufficient by the CFA and DTP. Construction will address relevant bushfire protection and mitigation requirements using materials in accordance with relevant Australian Standards.

Clause 15.01 -1S Urban Design

The amendment will enable the land to be developed for residential uses, as per the surrounding land. The proposed Neighbourhood Residential Zone – Schedule 9 requires development applications to include a landscape plan, and to consider open

space and front setbacks, to allow for planting and retention of canopy trees. Furthermore, the objectives of the Schedule require development to respond to existing neighbourhood character, including built form and landscaping.

Clauses 16.01-1S Housing Supply and Clause 16.01-1L Housing supply in Moorabool. The proposed rezoning will contribute to the supply of housing within an established settlement area. The land is located close to jobs, community facilities and retail opportunities provided within Bacchus Marsh. Public transport is to be provided within the Underbank Estate, to the north and west of the land, which enables connection with the Bacchus Marsh town centre.

How does the amendment support or implement the Municipal Planning Strategy?

The amendment is consistent with the strategic directions in the Municipal Planning Strategy within Clause 02 of the Moorabool Planning Scheme.

Bacchus Marsh is identified as an area of significant growth and change within Clause 02.01 - Context, which also identifies that the population of the Shire is estimated to increase by 76 percent between 2021 and 2041.

This is reiterated by Clause 02.03-1 Settlement, which states that Bacchus Marsh has been identified as a suitable location for growth due to its regional service centre role, its relative accessibility to Melbourne, Geelong and Ballarat, its well-established town centre and the availability of greenfield and infill development opportunities. The clause therefore seeks to direct growth within the shire to Bacchus Marsh and Ballan.

The potential increase in supply of residential land will assist in accommodating the growing population within the Shire, and any provision of community services will benefit communities within the Bacchus Marsh area, particularly within the establishing Underbank Estate.

Does the amendment make proper use of the Victoria Planning Provisions?

The amendment makes proper use of the Victorian Planning Provisions by applying the NRZ. *Planning Practice Note 91: Using the residential zones* states that a key factor when selecting a residential zone to apply is the desired maximum building height. NRZ is applied to areas where a single and double-storey character is present and sought to be retained, by maintaining a two-storey (9 metre) height limit for residential buildings. The NRZ aims to "manage and ensure development that respects the identified neighbourhood character, heritage, environmental, or landscape characteristics" ensuring low-lying developments consistent with the surrounding area. The recently constructed dwellings neighbouring the site are single and double storey, and extending this built form to the subject site will result in

a cohesive neighbourhood character consistent with the existing Underbank Farm DPO6 area.

The application of the Development Plan Overlay (DPO) is supported by the Victorian Planning Provisions at Clause 11.02-2L that refers to the management of urban growth through Development Plans. The DPO is used to identify and guide the assessment of future use and development. The DPO will ensure that development of the subject site responds to the surrounding area, including the existing residential areas and the Werribee River environs. A Concept Plan to accompany the DPO has been prepared which identifies proposed possible future uses for each lot. The DPO will require the preparation of several background documents including (in part) traffic management, stormwater management, flora and fauna and landscape masterplans.

The amendment retains and is influenced by the existing controls including the Environmental Significance Overlay Schedule 2 (ESO2) which aims to ensure that development aligns with identified environmental values, including ensuring that buildings and works do not compromise water quality of waterways, flora and fauna habitat. By retaining the ESO2 and setting aside a portion of the land as reserves to be rezoned to the Public Park and Recreation Zone (PPRZ) after the land has been transferred to the council, the environmentally constrained area is protected from development.

The subject site is partially impacted by the Land Subject to Inundation Overlay (LSIO), which applies to land subject to the 1-in-100-year flood extent of the Werribee River. The provisions of the LSIO are designed to minimize flood risk to life, health, and safety associated with development. The LSIO also ensures that development maintains or improves river and waterway health. The creation of reserves will prevent development in areas prone to potential inundation. This will sustainably protect the land and benefit the health of the Werribee River. The LSIO-encumbered land will be transferred to Moorabool Shire Council after permit obligations are fulfilled as part of the combined subdivision process and will then be rezoned to PPRZ in a future amendment.

How does the amendment address the views of any relevant agency?

The views of all relevant agencies were sought by Council following lodgement of this amendment request and have been addressed as follows:

- The Stormwater Management Plan and planning permit conditions associated with the combined subdivision application address Melbourne Water's views. Matters of concerns for Melbourne Water regarding access, the reduction of development in flood-prone areas, stormwater management and biodiversity retention were resolved. A small portion of the accessway is covered by the LSIO within the Melbourne Water mapping system however this was resolved via the Development Plan Overlay mechanisms and the conditions of the draft planning permit.
- The views of the EPA were sought on the PSI and the EPA recommended that

Ministerial Direction 1 be explained in this report. The final PSI was satisfactory as it concluded that the site is not potentially contaminated. This report provides a more detailed response to Ministerial Direction 1 on page 10.

- The Country Fire Authority provided a response based on Clause 13 of the planning scheme and recommended bushfire protection measures. Their views are captured in the Development Plan Overlay via the requirements for a Bushfire Management Plan.
- The Department of Energy, Environment and Climate Action (DEECA) had no objections to the rezoning of land along the Werribee River. DEECA proposed conditions which have been included in the draft planning permit.
- PowerCor and Greater Western Water provided conditions which are included in the draft planning permit.

The amendment will be formally referred to relevant authorities as part of the exhibition of the amendment and 96A planning application, and as part of any future applications to develop the site.

Does the amendment address relevant requirements of the Transport Integration Act 2010?

The amendment will not significantly impact the transport system. Whilst the proposal will result in increases of traffic around the Adelong Way and Halletts Way intersection, additional traffic generation has been considered as part of the rezoning proposal, and appropriate mitigation measures are proposed in accordance with the Traffic Impact Assessment supporting the amendment. Accordingly, it is considered that the proposal is appropriate in the context of the requirements of the *Transport Integration Act 2010*.

Resource and administrative costs

What impact will the new planning provisions have on the resource and administrative costs of the responsible authority?

This amendment is not expected to have significant impact on the administrative costs of the responsible authority. Council resources will be required to facilitate the approval of a Development Plan and subsequent planning permits. The additional resourcing that will be required to put the planning framework in place is not unreasonable and is necessary to ensure ongoing availability of residential land consistent with the Municipal Planning Strategy in Bacchus Marsh.