



Moorabool Planning Scheme Amendment C115moor - Moorabool Retail Strategy

Submitted By : Anonymous User

Submitted On : 2025-10-29 16:00:46

Organisation Name :

Phone :

Email :

Thank you for taking the time to provide your submission. Please enter your details below to proceed.

Q.1 Full Name:

A. [REDACTED]

Q.2 Organisation or Business Name (if applicable)

A. [REDACTED]

Q.3 Email Address:

A. [REDACTED]

Q.4 Phone Number:

A. [REDACTED]

Submission

Q.1 How would you like to provide your submission to Moorabool Planning Scheme Amendment C115moor?

A. Provide a submission in the box below
 Upload a prepared submission document

Please write your submission here:

1. Overview I write in relation to Amendment C115moor to the Moorabool Planning Scheme, which seeks to implement the Moorabool Shire Retail Strategy 2024. While I support the intent to provide clear strategic direction for retail and activity-centre planning across the municipality, I object to any policy settings that enable or encourage the proliferation of additional neighbourhood or town centres within or near Bacchus Marsh. Such an approach risks fragmenting the retail hierarchy, undermining the ongoing viability and investment confidence in the Bacchus Marsh Major Activity Centre (MAC), and diluting the role of the town as the primary retail, civic and employment hub of the Shire.

2. Strategic Context and Planning Intent Bacchus Marsh is rightly designated as a Major Activity Centre—the Shire's principal urban focus for higher-order retail, services, employment, and transport integration. State policy within Plan Melbourne and the Regional Growth Plan for Central Highlands both emphasise consolidation of activity and investment within established centres rather than dispersal. Encouraging further neighbourhood centres beyond those already planned in emerging residential areas is inconsistent with this hierarchy. It risks creating a pattern of small, under-performing centres rather than a vibrant, economically resilient main centre.

3. Economic and Commercial Considerations

Market Capacity and Leakage: The Moorabool retail catchment is finite. Introducing additional centres will not generate new retail demand; it will merely redistribute limited spending away from Bacchus Marsh. This weakens rental performance, discourages reinvestment, and may accelerate vacancy in the existing town core.

Investment Certainty: The current trajectory of public and private investment in Bacchus Marsh—streetscape upgrades, civic facilities, and private retail development—relies on confidence that the MAC will remain the focus of commercial activity. Policy ambiguity or encouragement of competing nodes risks undermining these commitments.

Employment Concentration: Consolidation of jobs within the MAC promotes critical mass, transport efficiency and active-transport outcomes. Dispersing retail jobs to peripheral neighbourhood centres increases car dependence and diminishes the employment density necessary to sustain public transport viability.

4. Urban Design and Community Outcomes

Sense of Place: Bacchus Marsh's character derives from a cohesive and walkable town centre framed by heritage, community, and landscape assets. Spreading retail to multiple smaller nodes will dilute this identity and reduce the vibrancy of the main street precinct.

Sustainability and Infrastructure Efficiency: Centralised retail reduces duplicated infrastructure and services (parking, waste, public realm). Additional neighbourhood centres create inefficiencies and unnecessary infrastructure costs for Council.

Transport and Accessibility: A strengthened MAC located on the main transport spine (rail, bus, arterial network) provides the most equitable access for all residents, including those without private vehicles. Peripheral centres primarily cater to car trips, conflicting with sustainability and mode-shift objectives.

5. Alternative Approach

I urge Council to:

- Maintain a clear policy presumption against additional neighbourhood or town centres within the Bacchus Marsh urban area beyond those already identified in adopted structure plans.
- Focus retail growth and investment within the existing Bacchus Marsh Major Activity Centre, ensuring adequate zoned land, parking, access, and mixed-use integration.
- Encourage local convenience shops only where justified by walkable catchment demand and limited to small scale (e.g., < 1,000 m² GLA).
- Prioritise planning for improved transport, public realm, and residential intensification around the MAC rather than new retail dispersal.

6. Conclusion

Bacchus Marsh's long-term success as the primary retail and employment hub of the Shire depends on focus, not fragmentation. The introduction or expansion of additional neighbourhood and town centres would erode the commercial vitality, sustainability, and identity of the town centre—contrary to the strategic intent of both State and local policy. I therefore request that Amendment C115moor be modified to explicitly limit the creation or expansion of new neighbourhood or town centres in and around Bacchus Marsh, and to reaffirm Council's commitment to consolidating growth within the existing Major Activity Centre.

Q.2 What is your postal address?

A. [REDACTED]

Q.3 What is the address of the affected property (if it differs from your postal address)?

A. [REDACTED]



Moorabool Planning Scheme Amendment C115moor - Moorabool Retail Strategy

Submitted By : [REDACTED]

Submitted On : 2025-11-18 16:45:59

Organisation Name :

Phone : [REDACTED]

Email : [REDACTED]

Thank you for taking the time to provide your submission. Please enter your details below to proceed.

Q.1 Full Name:

A. [REDACTED]

Q.2 Organisation or Business Name (if applicable)

A. [REDACTED]

Q.3 Email Address:

A. [REDACTED]

Q.4 Phone Number:

A. [REDACTED]

Submission

Q.1 How would you like to provide your submission to Moorabool Planning Scheme Amendment C115moor?

- A. Provide a submission in the box below
- Upload a prepared submission document

Please write your submission here:

I have concerns that the large development on the western edge of Ballan will mean a large increase in traffic/parking needs etc in Ballan centre. There appears to be little thought given to this issue. The Ballan shopping centre - you state in the strategy that the heritage feel etc will be retained. YET the large, bulky modern developments planned for each side of the Oak Grove Gallery - in the heritage Newspaper building, will have a major effect on the streetscape, and destroy any hope of retaining a sympathetic result ! Absolutely devastating ! I also fear that a much larger and intrusive supermarket (Coles/Woolies) in the main street will also remove any hope of retaining a village feel, acknowledging heritage etc ! Overall, the comments regarding heritage/ appropriate and sympathetic development etc are vague, and will ultimately be ignored. Ballan will DEFINITELY lose its current 'village' feel and become a large and ugly town centre, with the few heritage buildings we have now swamped by development at any cost !! For profit to the developers !

Q.2 What is your postal address?

A. [REDACTED]

Q.3 What is the address of the affected property (if it differs from your postal address)?

A.



17 November 2025

Liam Prescott
Senior Strategic Planner
Moorabool Shire Council
PO Box 18
BALLAN 3460

Dear Liam,

Moorabool Planning Scheme Amendment C115moor – Moorabool Retail Strategy

We refer to the recently exhibited Moorabool Planning Scheme Amendment C115moor as shown on the Moorabool Shire's (the Shire) website relating to the Moorabool Retail Strategy (the Strategy). We note the amendment proposes to ensure new residential areas are well serviced by retail centres and to support appropriate retail expansion in small towns and villages.

Central Highlands Water (CHW) notes the Strategy outlines the Shire's retail direction in larger centres such as Ballan but also seeks to encourage retail development in smaller towns and villages such as Lal Lal, Wallace, Gordon and Mt Egerton. With the above in mind, CHW submits the following:

CHW provides reticulated water and sewer services to several towns in the Moorabool Shire including Ballan and Gordon. In addition, the Shire contains potable water supply catchments such as the Lal Lal and Ballarat Catchments which CHW are responsible for. The reservoirs within these catchments provide potable water to Ballarat and district plus Ballan, Wallace, Bungaree, Gordon and Mt Egerton. It is important that these catchments are protected from inappropriate development especially those areas where reticulated sewer is absent.

CHW has no objection to the Moorabool Retail Strategy however wishes to submit that the provision of retail in townships without sewerage (Mt Egerton, Wallace, Bungaree and Lal Lal) should be carefully considered. We support the Strategy that states 'small scale retail services' are to be located in smaller townships. If population grows in the central western part of the Shire and a commercial centre is to be in Wallace, CHW would like to provide further feedback on this proposal.

If you have any queries regarding CHW's submission, please contact [REDACTED]

Yours faithfully,



[REDACTED]
Team Leader - Planning



Moorabool Planning Scheme Amendment C115moor - Moorabool Retail Strategy

Submitted By : [REDACTED]

Submitted On : 2025-11-28 14:30:33

Organisation Name : Ample C/- Tract Phone : [REDACTED]

Email : [REDACTED]

Thank you for taking the time to provide your submission. Please enter your details below to proceed.

Q.1 Full Name:

A. [REDACTED]

Q.2 Organisation or Business Name (if applicable)

A. Ballan Dev Co Pty Ltd C/- Tract

Q.3 Email Address:

A. [REDACTED]

Q.4 Phone Number:

A. [REDACTED]

Submission

Q.1 How would you like to provide your submission to Moorabool Planning Scheme Amendment C115moor?

- Provide a submission in the box below
- Upload a prepared submission document

Please upload your submission here:

[REDACTED]

Q.2 What is your postal address?

A. [REDACTED]

Q.3 What is the address of the affected property (if it differs from your postal address)?

- A. Refer attachment

Kate Barclay

Manager Growth & Development
Moorabool Shire Council
Wurundjeri Woi Wurrung Country
215 Main Street
BACCHUS MARSH VIC 3340

28 November 2025

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

Dear Kate

**Submission to Amendment C115moor
Moorabool Planning Scheme**

1 Introduction

Tract acts on behalf of our client Ballan Dev Co Pty Ltd, a subsidiary of Ample Investments Group, in relation to this matter.

Our client hereby provides a submission to Moorabool Planning Scheme Amendment C115moor (the 'Amendment') which seeks to implement the *Moorabool Shire Retail Strategy 2024* prepared by Tim Nott with Hansen Partnership (the 'Strategy') adopted by Council on 4 September 2024 into the *Moorabool Planning Scheme*.

The Amendment seeks to guide the development of retail activity centres in Moorabool Shire over the next 10 years, and will complement Council's existing strategies on economic development, tourism and land use planning.

Our client is actively engaged in the Ballan South growth area and fully endorses the Amendment's approach to activity centre planning, particularly the designation of the Ballan South Neighbourhood Activity Centre (NAC) as a key component of the future township structure. This element will play a vital role in supporting anticipated housing growth, delivering community services and fostering local economic activity.

2 Ballan Dev Co Preliminary PSA

Ballan Dev Co is responsible for approximately 60-hectares of land south of the Ballan township, within the township boundary (Refer Figure 1). The area is bounded by Windle Street to the east, Denholms Road to the west, Walsh Street to the northern rail interface, and farmland along the southern boundary.

The Site is partially within the identified Precinct 6 of the Ballan Framework Plan and partially within the area earmarked as a 'future investigation area' (Precinct 8) south of Gillespies Lane. The land is well located adjacent the Ballan Train Station and only 600-metres south of existing township services and facilities.



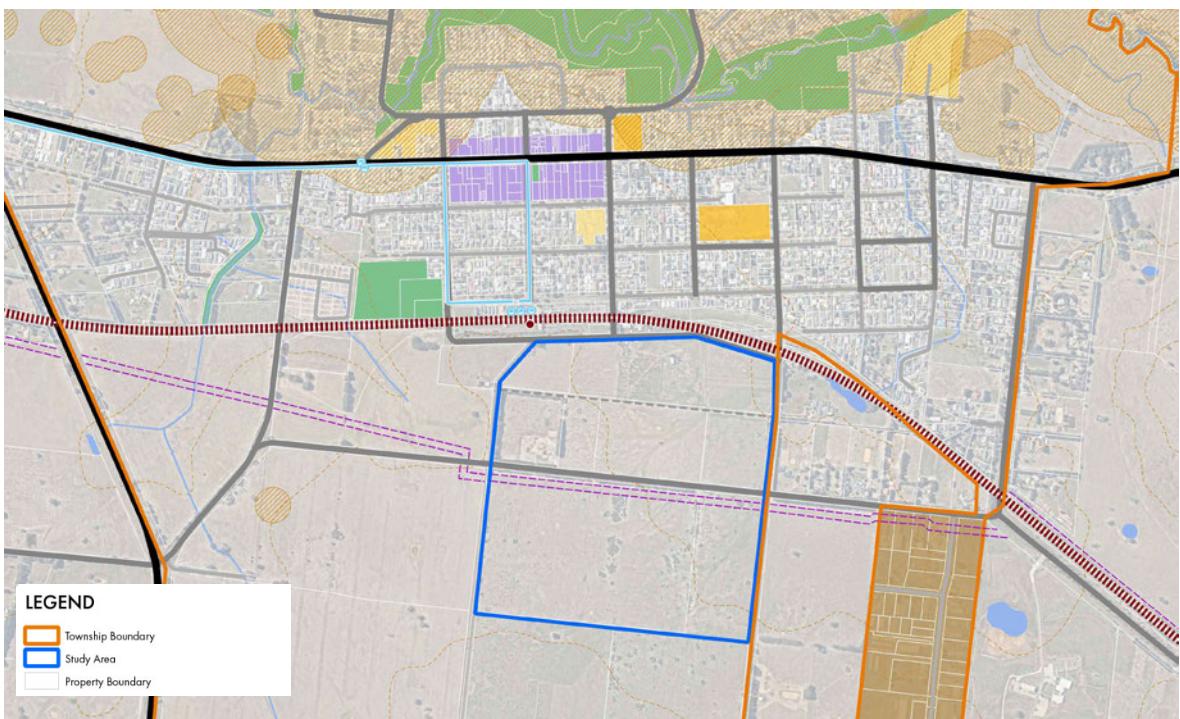


Figure 1 – Ample Site Plan

3 Amendment C115 Summary

The Amendment reflects a clear and evidence-based strategy that appropriately anticipates Ballan's growth trajectory over the next decades and recognises Ballan as a township transitioning from a rural service centre to a modern, growing residential community with a broadening economic base.

The Ballan South NAC has been identified as a strategically critical element to accommodate Ballan's forecast growth and deliver liveable, walkable communities within the southern residential expansion area.

This future centre responds directly to both State and Local Planning Policy directions as well as evidence base established in Council's Retail Strategy 2024, Economic Development Strategy 2023–2027 and Visitor Economy Strategy 2023–2027, all of which confirm the need for an additional NAC south of the railway line.

Key strategic directions include:

- Focusing development on the existing Ballan Town Centre in the short term, with provision for a future NAC to the south once population thresholds can support its establishment.
- A new NAC is identified south of the railway station, traversing land that is currently being considered under Ample's preliminary PSA, with an indicative location shown in strategic mapping (refer to purple circle in Figure 2) and proposed amended Clause 11.03-1L).
- A strong emphasis on creating a pedestrian and cycling spine linking Ballan South to the town centre, while minimising road crossings to enhance safety and accessibility.
- The need to prepare an Urban Design Framework (UDF) or Structure Plan for the Ballan Town Centre to guide integrated development and ensure the NAC complements, rather than competes with, the town core.

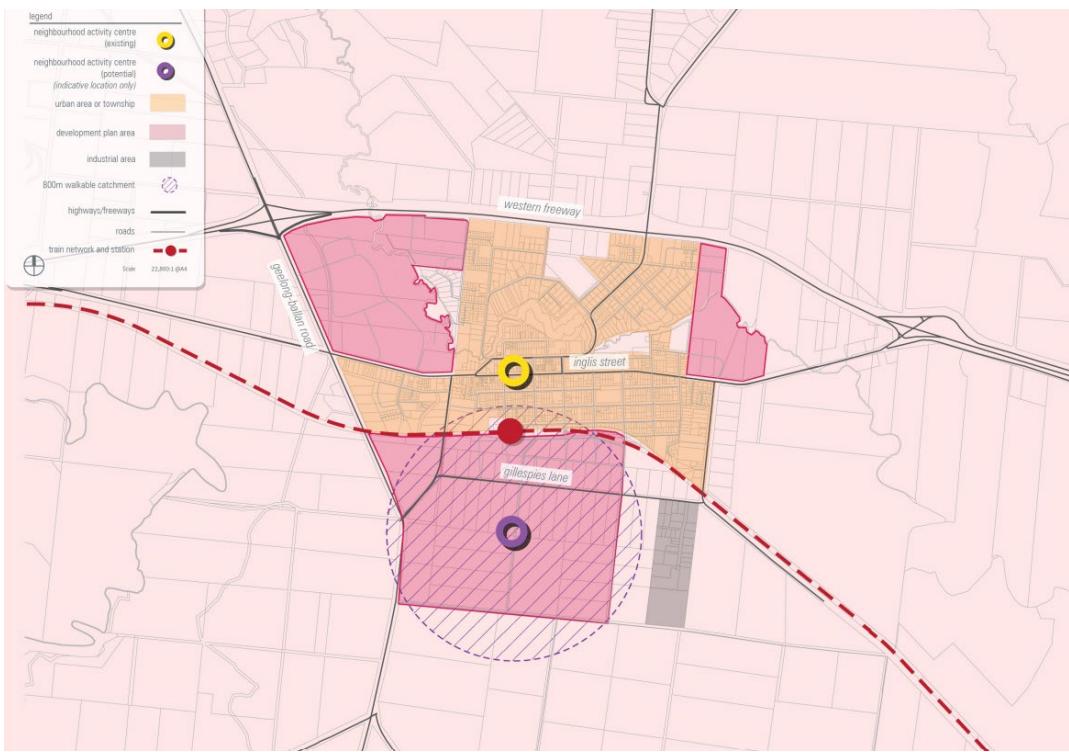


Figure 2 – Proposed Clause 11.03-1L – Activity Centres Plan

4 Submission

Our client strongly supports the Amendment and the strategic identification of the Ballan South NAC.

This Amendment establishes a clear and coordinated pathway toward creating a well serviced, sustainable, and connected community, and our client welcomes the opportunity to work collaboratively with Council as planning for the area advances.

Based on our review of the Amendment documentation, the strategic drivers for the Ballan South NAC are clear and compelling, and include the following:

- Substantial growth is projected within Precinct 6 and the Future Investigation Area, with long-term forecasts indicating Ballan's population could exceed 11,000 residents.
- The NAC will provide residents with walkable access to essential services such as groceries, medical, childcare and community facilities, in line with the principles of a 20-minute neighbourhood.
- Establishing the NAC will deliver a complementary retail node that supports the town centre, rather than placing additional strain on it, thereby preserving its civic, cultural and heritage role.

The Ballan South NAC will serve as a central focal point for community identity and provide an integrated urban structure that supports cohesive neighbourhood planning. It will deliver essential services, significantly improving liveability. The centre will also reduce reliance on private car travel, ease congestion within the main street, and promote active transport connections through enhanced pedestrian and cycling networks.

In addition, the Ballan South NAC will generate local employment opportunities, attract business investment and reduce escape expenditure, directly aligning with Council's economic strategy. Without the Ballan South NAC, new residents would face significant barriers to daily needs, including reliance on private

vehicle travel for basic services, the need to cross the railway line, creating accessibility and safety challenges and increased pressure on the town centre, leading to congestion and potential heritage impacts.

The Ballan South NAC resolves these issues by ensuring new communities are self-sufficient, walkable and resilient, while safeguarding the heritage and civic role of the existing town centre.

5 Conclusion

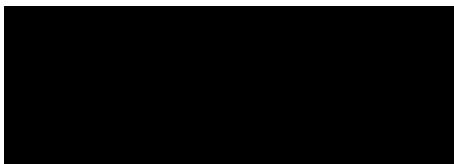
Our client commends Council for its proactive approach and alignment with best-practice activity centre planning. This Amendment provides a strong foundation for orderly and coordinated development, and our client looks forward to working cooperatively with Council to ensure the NAC is delivered as intended, becoming the focal point of a thriving and liveable southern neighbourhood.

We look forward to being part of the amendment process and are excited by the prospect of providing the residents of Ballan with well-located and diverse retail, commercial and community options into the future.

We look forward to continuing to work constructively with Council and would be pleased to discuss this submission with you further.

Please contact the undersigned on [REDACTED] should you wish to discuss the submission further.

Yours sincerely

A large rectangular area of the page is completely blacked out, obscuring a handwritten signature.

[REDACTED]
Principal Town Planner
Tract
[REDACTED]

Amy Gloury

From: [REDACTED]
Sent: Friday, 28 November 2025 3:33 PM
To: info@moorabool.vic.gov.au
Subject: Planning Scheme Amendment C115moor - Submission from BMS Retail Group Pty Ltd & Velardo Trading Pty Ltd
Attachments: Amendment C115moor - Submission by BMS Retail Group Pty Ltd & Velardo Trading.pdf
Categories: Lesley Christian

Dear Moorabool Shire Council,

Please find attached a submission to the above amendment on behalf of BMS Retail Group Pty Ltd & Velardo Trading Pty Ltd.

I am the submitter's contact for the matter, please see my details below.

Kind regards

[REDACTED]

[REDACTED]

28 November, 2025

Moorabool Shire Council
Via email: info@moorabool.vic.gov.au

Dear Sir/Madam,

Re: Planning Scheme Amendment C115moor

I refer to the above planning scheme Amendment ('the Amendment'). This submission has been prepared jointly on behalf of:

- BMS Retail Group Pty Ltd trading as Champions IGA, the operators of IGA supermarkets at Darley Plaza and Maddingley Village; and
- Velardo Trading Pty Ltd, the owner of land at 151 Gisborne Road, Darley, known as Darley Plaza. They also own adjoining vacant land at 8 Jonathan Drive, Darley, which is zoned General Residential.

Champions IGA is the largest supermarket operator in Bacchus Marsh both by floorspace and number of stores.

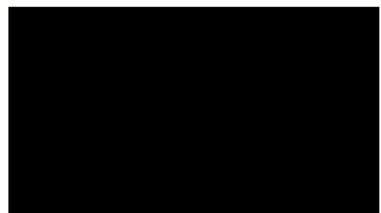
My clients generally support the Amendment and the objectives of the *Moorabool Shire Retail Strategy 2024* ('the Retail Strategy'). They are, however, concerned about a number of elements of the Amendment and seek changes outlined in this submission.

My clients' submission to the Draft Moorabool Retail Strategy (2023) dated 27/2/2024, provides additional information in relation to a number of these matters.

Darley Plaza redevelopment

My clients are actively seeking to re-develop Darley Plaza and have been actively engaged with Council over many years to resolve a number of challenges relating to the development. The current proposal for the centre will include office space, a gym and additional retail spaces, with a gross floor area of approximately 4,000m². These uses will enhance its role as a neighbourhood activity centre, as envisaged through Amendment C115moor.

The project will lead to a total investment in the vicinity of \$15-20 million and create a larger supermarket with 130 – 150 staff and further jobs in the new tenancies. The redevelopment would rely upon the rezoning of land at 8 Jonathan Drive to Commercial 1, to provide additional car parking for the centre.



Darley Plaza - flooding constraints

Flooding is a key issue for the redevelopment of Darley Plaza. Advice from Melbourne Water (June, 2022) indicates that the current supermarket floor level is approximately 170mm below the estimated 1% AEP flood level.

My clients have engaged Afflux Consulting to undertake hydrological modelling for the site, which has previously been presented to Council. The modelling reveals that it will be very challenging for the development to satisfy Melbourne Water's potential requirements. Specifically, if standard expectations of 300mm of freeboard are adopted, this would require the demolition of the entire existing building and substantial earthworks across the site. This will not be possible due to the substantial additional costs and loss of trade.

The modelling identified a further option that may facilitate the project. This would involve the construction of a new underground pipe along Grey Street to capture and bypass flows from upstream areas. This has the potential to reduce flood depths in critical areas across the site by around 0.05 to 0.1m but would be a significant cost and would need to be located on road reserves.

My clients acknowledge that these issues are outside the main considerations of the Amendment, however, they are fundamental to the redevelopment of the Darley Plaza site, which is supported by the Amendment and the Retail Strategy. They should therefore be acknowledged in an appropriate way in the Planning Scheme, to provide the foundation for further planning investigations and decision making.

Merrimu activity centres

We support the development of new activity centres in Merrimu, however, these must be carefully planned and managed to ensure that they complement one another and are delivered equitably. We note that a Precinct Structure Plan is under preparation for Merrimu, but no retail or commercial assessments have yet been prepared.

We are concerned that one or two centres may dominate the new catchments and limit opportunities for smaller more efficient supermarkets to become established, at the detriment of local communities. We will engage with the Precinct Structure Plan process in due course, however, request that Council advocate strongly for this outcome. Again, this issue should be acknowledged in an appropriate way in the Planning Scheme.

It is also noted that the Retail Strategy and exhibited Clause 11.03-1L differ in the type of proposed activity centres for Merrimu: Figure 2.2 of the Strategy shows three neighbourhood centres and Clause 11.03-1L shows two neighbourhood centres and a local centre. This could raise issues and uncertainties for the future planning of this area.

Submissions

We request that the Amendment be changed as follows:

- Identify flooding as a constraint to the redevelopment of Darley Plaza (e.g. Clause 02.03)
- Include a specific strategy to facilitate the resolution of flooding constraints at Darley Plaza, in consultation with Melbourne Water (e.g. Clause 11.03-1L)
- Support the future rezoning of General Residential zoned land in Jonathan Drive, adjoining Darley Plaza, to Commercial 1, to enable the redevelopment of Darley Plaza (e.g. Clause 11.03-1L)
- Discourage the consolidation of activity centres or unplanned retail floorspace in the Merrimu precinct (e.g. Clause 11.03-1L)
- Clarify the number and type of activity centres envisaged for the Merrimu Precinct in the Amendment and Retail Strategy, and the rationale behind any inconsistency between these documents.

We would be happy to provide any further information to clarify this submission. We also request to be heard at a Planning Panel for the Amendment.

Please do not hesitate to contact me on [REDACTED] if you would like to discuss any aspect of this submission.

Yours sincerely


[REDACTED]

Centrum Town Planning

Amy Gloury

From: [REDACTED]
Sent: Friday, 28 November 2025 3:39 PM
To: Moorabool Info
Cc: Liam Prescott; Ross@urbanld.com.au
Subject: Amendment C115moor Submission - 10 East Maddingley Road Investments Pty Ltd
Attachments: E231077_1_Submission to AmendmentC115moor_V1.pdf

Categories: [REDACTED]

Good afternoon,

Please find attached a submission to Amendment C115moor on behalf of 10 East Maddingley Road Investments Pty Ltd.

We look forward to your consideration of our submission.

Regards

Deb



Director, Technical Lead - Planning



MELBOURNE | Wurundjeri Woi Wurrung Country, [REDACTED]



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28 November 2025

Liam Prescott
Moorabool Shire Council
PO Box 18
Ballan VIC 3342

**Re: Submission to Amendment C115moor
10 East Maddingley Road**

Dear Liam,

1 Introduction

EMM Consulting Pty Ltd (EMM) acts on behalf of the Closter family, of 10 East Maddingly Road Investments Pty Ltd (10EMRI), the owners of the property known as 10 East Maddingley Road, Bacchus Marsh, Victoria (Subject Site) which is in 30 titles covering approximately 21.35 hectares of land on the southern edge of Bacchus Marsh.

As you would be aware, 10EMRI has been liaising with Council for some time seeking to facilitate a rezoning of the Subject Site to enable the development of commercial land uses. Accordingly, EMM is pleased to lodge this submission on behalf of 10EMRI in relation to Amendment C115moor to the Moorabool Planning Scheme, which seeks to implement the findings of Moorabool Retail Strategy 2024 (the Retail Strategy) and the supporting Moorabool Retail Strategy Background Report 2024 (the Background Report).

2 Subject Site and Surrounds

2.1 Subject Site

The Subject Site comprises of land in three properties and 30 lots with a combined area of 21.35 hectares, making up an entire block bound by the road reservations of Parwan Road/ Geelong-Bacchus Marsh Road, Tilleys Road, East Maddingley Road and Fisken Street. The largest of the properties comprising the site is simply described as East Maddingley Road. The others are known as 6 and 10 East Maddingley Road. For the purposes of this submission the entire landholding will be referred to as 10 East Maddingley Road.

The land is an irregular rectangle in shape, with a primary frontage to Parwan Road of approximately 500 metres, at a diagonal angle. The site has an overall fall of 30 metres from the south to the north, however, falls more steeply within 200 metres of the north-western corner, otherwise sloping gently.

The land is subdivided into multiple lots, with smaller lots located near the north-western corner, where a former residential subdivision was once created, but was largely undeveloped except for two dwellings fronting East Maddingley Road.

Except for the two dwellings mentioned above, the land comprises flat farming land which is cultivated for cropping purposes. There is a former poultry shed located in the western part of the site. There is no significant vegetation present onsite.

2.2 Surrounds

The land is contiguous with the existing urban area of Bacchus Marsh. Fisken Street runs along the eastern border of the Subject Site and is an unsealed minor road within a 20 metres wide reserve. To the east of this is a large single lot developed with a dwelling and otherwise used as farming land.

Parwan Road runs along the northern boundary of the Subject Site, becoming known as Geelong-Bacchus Marsh Road east of the intersection with Fisken Street. Parwan Road is a sealed arterial road within a 60 metres wide road reserve. North of this are a number of dwellings and commercial buildings.

To the west, East Maddingley Road, a minor sealed road within a 20-metre-wide reservation, runs along the entire length of the Subject Site. The southernmost two-thirds of the site are opposite land across East Maddingley Road also zoned Special Use 1, part of which is used as a school (Bacchus Marsh Grammar). The northernmost third of the property sits opposite land zoned General Residential 2, which is used and developed for freestanding dwellings and some cleared vacant land.

South of the Subject Site is Tilleys Road, an unsealed minor road. On the opposite side of the road is the northern boundary of the Maddingley Brown Coal site, where both coal mining and waste composting are undertaken, both land uses being incompatible with sensitive uses.

The Subject Site is located in close proximity to the Bacchus Marsh train station (located approximately 200 metres from the north west corner of the site) and the Station Street industrial precinct (less than 500 metres to the north of the Subject Site) to the north.

3 Moorabool Planning Scheme

Relevant policy directions of the Moorabool Planning Scheme (the Planning Scheme) in relation to bulky goods retailing include the following.

- (a) **Clause 02.03-7 Economic Development**, which states that Council seeks to '*strengthen the local economy to improve local employment opportunities, meet the needs of residents and reduce escape expenditure by..... facilitating a bulky goods (restricted retail) precinct that is convenient to the Bacchus Marsh community and able to accommodate large footprint retail uses*'. (our emphasis)
- (b) **Clause 17.02-1L Business**, which includes as a strategy to '*plan for an out-of-centre bulky goods retail (restricted retail) precinct in Bacchus Marsh sufficient to accommodate the long terms needs for such uses*'.

From a zoning and overlay perspective the land is zoned Special Use Zone 1 and is located within the EPA-recommended 1km buffer for coal mining and 2km buffer for composting at Maddingly Brown Coal, which occupies the adjoining land to the south. It is, however, located outside the mining licence area.

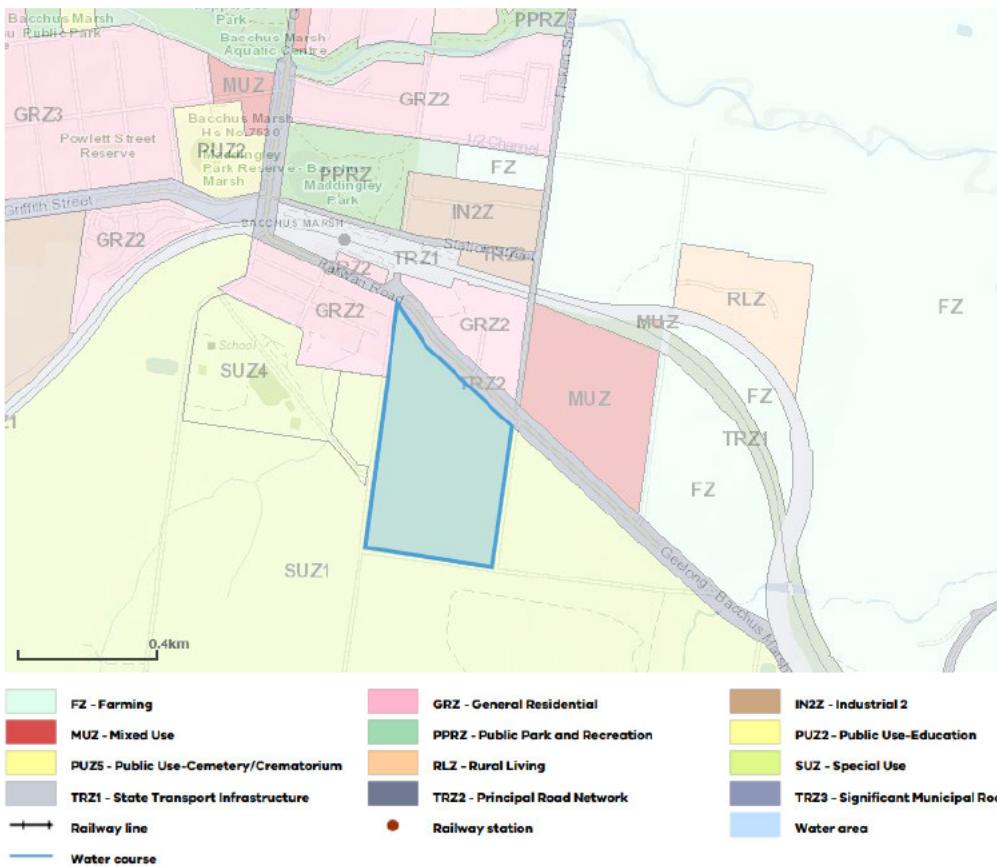


Figure 3.1 Zoning map extract with Subject Site boundaries indicated in blue, VicPlan

4 Other relevant background strategic planning documents

4.1 Moorabool Retail Strategy 2041, MacroPlan Dimasi (March 2016)

Council released its previous Retail Strategy in 2016, which estimated that in 2014 Bacchus Marsh was already underserviced by bulky goods floorspace, with demand for 6000 square metres more floorspace than existed at that time, and that this would increase to a shortfall of almost 12,000 square metres by 2041.

The Strategy noted that the spatial constraints of the Bacchus Marsh Town Centre made it unsuitable for this type of retailing, and proposed instead that an out-of-centre bulky goods centre be established on a single site that meets five key locational attributes:

- located on an arterial road, highly visible and well exposed to passing traffic;
- easily accessible for local residents, as well as residents in the broader surrounding region;
- sufficient size to cluster similar uses;
- a relatively flat site; and
- sympathetic to surrounding uses (particularly sensitive residential uses) with adequate buffer separation provided as appropriate.

The Strategy recommended further detailed research to plan for bulky goods/homemaker retail space in Moorabool Shire, encompassing an overview of Australian retail trends, comparative analysis with similar areas,

assessment of potential retailers, and guidelines for Council consideration, including preferred zoning and controls. This was undertaken in the Moorabool Strategic Bulky Goods Assessment as discussed at Section 4.3.

4.2 Bacchus Marsh Urban Growth Framework Plan, Moorabool Shire Council and Victorian Planning Authority (August 2018)

Developed jointly by the Victorian Planning Authority (VPA) and Moorabool Shire Council, the Urban Growth Framework Plan (UGF) is, in its own words, '*a strategic document that will guide growth to 2041 and beyond. It defines the settlement boundary and nominates potential growth areas based on land capability and growth needs. It ties growth areas to particular infrastructure delivery and provides objectives and principles for each potential growth area*'.

In relation to a bulky goods precinct, the UGF states that '*Council is currently undertaking a strategic assessment to identify potential locations. This strategic assessment will be exhibited before deciding on a final location for the precinct*'.

4.3 Moorabool Strategic Bulky Goods Assessment, Essential Economics (November 2018)

This Assessment was commissioned by Moorabool Shire Council with the express purpose of identifying preferred locations for bulky goods retailing in Bacchus Marsh to 2041, in accordance with the recommendation of the 2016 Retail Strategy.

The bulky goods floorspace demand forecasts from the 2016 Strategy are used and the Assessment concludes that 3.5 to 4.0 hectares of additional land will be required for bulky goods retailing by 2031, increasing to 4.2 to 4.7 hectares by 2041.

The Assessment nominated three sites on the intersection of Bacchus Marsh-Geelong Road and Fiskin Street as the preferred locations for bulky goods retailing in Bacchus Marsh (sites 1A, 1B and 1C in Figure 4.1 below). The Subject Site comprises Site 1A (shown on the plan below).

The Assessment recommended that the land be rezoned to Commercial 2 or Special Use, with a Development Plan Overlay, to ensure the master-planning of an acceptable development that is compatible with the ongoing uses to the south of the site.

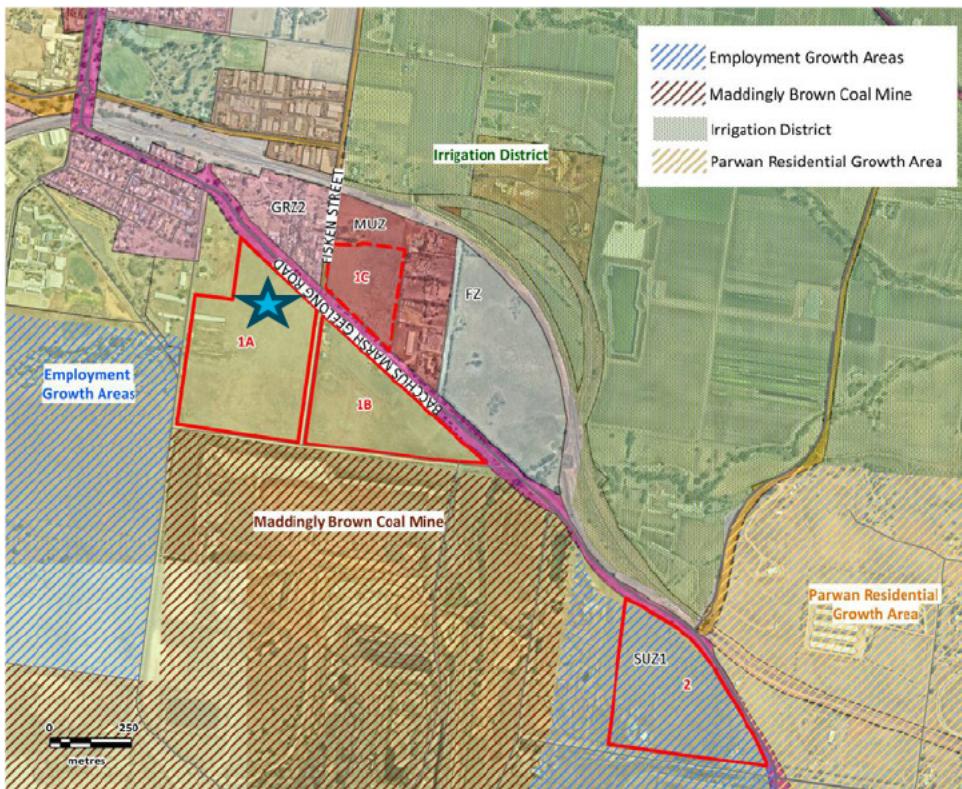


Figure 4.1 Location of preferred bulky goods retailing sites (1A, 1B, or 1C) extracted from Moorabool Strategic Bulky Goods Retail Assessment 2017

Prior to identifying a preferred location, the Assessment undertook a broader locational analysis, followed by a more detailed comparative assessment of Site 1 (comprising the three sub-areas) compared to Site 2 (refer Figure 6.1 above). The assessment involved consideration of a range of issues and alternative sites and was informed by various Council departments including Strategic and Sustainable Development, Statutory Planning and Engineering Services (refer Page 28 of the Assessment). As a result of that assessment, Site 1 (comprising the three sub-areas) was identified as the preferred.

4.4 Maddingley Planning Study, Centrum Town Planning (2021)

The Maddingley Planning Study was prepared for Moorabool Shire Council and sought to provide an informed basis for future planning of the Maddingley area. In doing so it noted the recommendation of the *Bulky Goods Retail Assessment*, that Sub-area 6 is the preferred location for a bulky goods precinct to service Bacchus Marsh (refer Figure 6.2 following) The Maddingley Study also cited the conclusions of the 2016 Retail Strategy, noting that bulky goods retail floorspace is required in a strategic location on the outskirts of Bacchus Marsh.

The Maddingley Study made the following recommendation for Sub-area 6, which includes the Subject Site:

'Rezone all of the land in Sub-area 6 (North east) from SUZ1 to Industrial 3 Zone and/or Commercial 2 Zone (C2Z), subject to a review of:

- i. industrial land supply and demand in the municipality, with a particular focus on land for light/service industry; and*
- ii. commercial land supply and demand, with a particular focus on potential uses within the Commercial 2 Zone.*

Alternatively, if IN3Z and/or C2Z cannot be strategically justified, rezone the land to FZ.'

The recommendation is conditional on a review of industrial/commercial land supply because the Study considered the amount of land needed for these purposes is unknown. It warned that the bulky goods floorspace estimates in the 2016 Strategy were likely underestimates now given the additional growth areas planned around Bacchus Marsh but is unclear how much land is required for this and other compatible industrial uses.

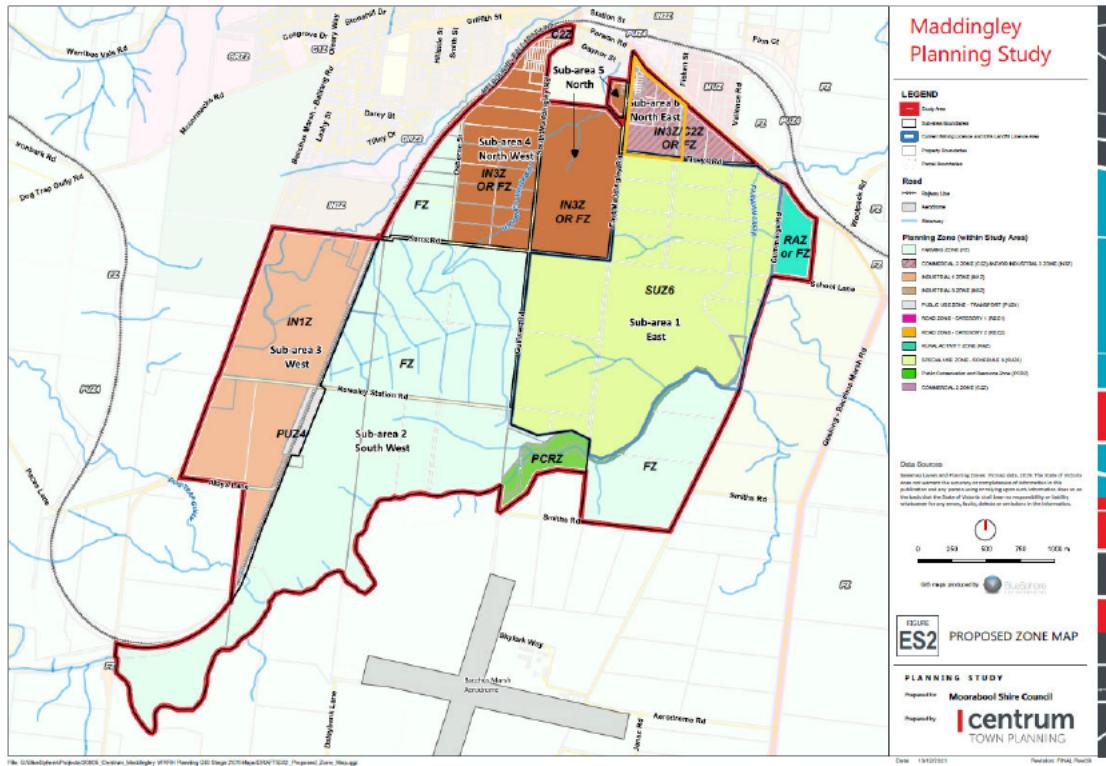


Figure 4.2 Proposed Zone Map extracted from the Maddingley Planning Study

4.5 Parwan Employment Precinct Scoping Study, Urban Enterprise (July 2022)

This scoping study for the Parwan Station employment precinct was prepared jointly for the VPA and Moorabool Shire Council. The Study estimated that the complete development of Bacchus Marsh in accordance with the UGF will create a need for an extra 20,500 square metres of bulky goods floorspace in addition to floorspace demand already generated by the existing population (estimated to be just under 8000 square metres based on the 2016 Retail Strategy). The study identified that this would necessitate approximately 13.6 hectares of additional developable land, triple the requirement previously calculated as part of the 2016 Retail Strategy.

4.6 Bacchus Marsh Retail and Economic Assessment, HillPDA (October 2023)

This Assessment was also prepared jointly for the VPA and Moorabool Shire Council. This Assessment appears to have been undertaken at the same time as an earlier draft of the Retail Strategy however neither document refers to each other (although the draft Strategy appears to reference a 2021 version of this report).

This Assessment estimates that projected population growth in Bacchus Marsh and surrounds will generate the need for 28,525 sqm of bulky goods floorspace by 2041, a figure which is broadly consistent with the estimate in the Parwan Employment Precinct Scoping Study.

5 Amendment C115 Ordinance

The Explanatory Report for Amendment C115moor states that the Amendment seeks to implement the *Moorabool Shire Retail Strategy 2024*. It seeks to do this by updating the hierarchy of retail activity centres to

reflect new and emerging residential growth areas already identified in the scheme, and updating various economic and retail guidance throughout the scheme.

The Amendment seeks to ensure that new residential areas are well serviced by retail centres, and that there is appropriate retail expansion in the small towns and villages. It also supports the provision of a wider range of goods and services in appropriate locations.

The Explanatory Report describes the Amendment as proposing the following changes to the Moorabool Planning Scheme.

- *Amend Clause 02.03-1 Strategic Directions to describe Bacchus Marsh as a Major Activity Centre and include updates to Ballan and Small Towns and Settlements sections.*
- *Amend Clause 02.03-7 Economic Development to include minor changes to existing policy.*
- *Amend Clause 11.01-1L-03 Ballan to remove Ballan Town Centre strategies.*
- *Amend Clause 11.03-1L Activity Centres to include an updated Retail Centre Hierarchy and add Ballan Town Centre strategies.*
- *Amend Clause 17.02-1L Business to add strategies for Bungaree and Gordon and expand on the existing bulky goods strategy.*
- *Amend Clause 17.04-1L Tourism to include local strategies derived from the Visitor Economy Strategy 2024.*
- *Amend Clause 18.01-3L Sustainable personal transport to provide support for a pedestrian-bicycle link between a future Ballan South neighbourhood activity centre and Inglis Street.*
- *Amend the Schedule to Clause 34.01 Commercial 1 Zone to update 1.0 Maximum leasable floor area requirements based on the Retail Strategy assessments.*
- *Amend the Schedule to Clause 72.08 Background Documents to include new background documents Moorabool Shire Retail Strategy 2024 (Tim Nott with Hansen Partnership, 2024), Moorabool Shire Economic Development Strategy 2023-2027 (Urban Enterprise, 2024), and Moorabool Shire Visitor Economic Strategy 2023-2027 (Urban Enterprise, 2024).*
- *Amend the Schedule to Clause 74.02 Further strategic work to remove the Retail Strategy update and add an urban design framework or structure plan for Ballan town centre.*

6 Amendment C115moor and Bulky Goods retailing

6.1 Retail Strategy 2024

The Retail Strategy will replace the existing Moorabool Shire Council - *Retail Strategy 2041*, by Macroplan Dimasi (March 2016) and is intended to take into account and address the planned expansion of urban development proposed around Bacchus Marsh and Ballan.

Section 7 of the Retail Strategy discusses 'Support Provision of a Wider Range of Goods and Services'.

This section outlines the need for bulky goods /homemaker wares in an appropriately located precinct. The section acknowledges that there is no bulky goods floorspace in Moorabool and states that there is a current shortfall of approximately 12,000 square metres which could rise to 24,000 square metres depending on future development scenarios. The section then states the following.

'The modelled demand for bulky goods can only be approximate given the "lumpy" nature of provision. A typical Bunnings Warehouse store, for example, is 11,000 sqm (see Location IQ, 2023). In planning for a new bulky goods/homemaker precinct it would be prudent to allow for a site much larger than the anticipated demand. In this instance, an area of 10 to 12 hectares would allow for anticipated demand with a healthy margin for growth as well as car-parking and landscaping. This may be even larger if developed as part of a location for more general light industrial activity – warehousing, wholesale showrooms, small factories and the like'.

The Retail Strategy at page 26 then highlights that a site on the corner of Geelong-Bacchus Marsh Road and Fiskin Street (with an area of 3.7 hectares) would be suitable for bulky goods but that if this location is not available for development other nearby locations on the Geelong-Bacchus Marsh Road may be suitable, subject to further investigation. It is highlighted that a Bunnings has recently been approved for this Mixed Use zone Fiskin Street site (30 Fiskin Street Maddingley) and so it is no longer available for a broader range of bulky goods development.

In the longer term the Retail Strategy identifies a location on the western edge of the Parwan Station PSP area for bulky goods development.

Action 19, in Section 7, page 26 states the following:

'19. Identify a preferred area to accommodate a bulky goods retail (restricted retail) precinct in a location in Bacchus Marsh south of the railway line and with convenient access to the Geelong-Bacchus Marsh Road and the planned Eastern Link Road. The area identified should be able to readily deliver an efficiently serviced and well connected precinct with a total area of 10-12 hectares (approx.) allocated for bulky goods. The hectare figure is based on forecast population growth, and may be revised at a later date'.

At Section 9 'Implementation of the Strategy' Action 26 states the following.

'26. Ensure the activity centre design principles set out in section 5 are embedded into the relevant growth areas planning controls and that a bulky goods precinct is considered in proximity to Bacchus Marsh'.

We note that Action 26 listed at Section 11 'Consolidated Action Program' is inconsistent with Action 26 listed at Section 9. It appears that Section 11 has not been updated to reflect Section 9.

6.2 Planning Scheme Ordinance

Key changes that are proposed to the Planning Scheme ordinance to implement the findings of the Retail Strategy, and that are of relevance to a bulky goods precinct and the subject site can be summarised as follows.

- At Clause 02.03-1 'Settlement' reference to the BMTC as a Major Activity Centre which will continue to develop including generating opportunities for expanded services, including restricted retail/homemaker stores.
- At Clause 02.03-7 'Economic Development' retaining reference to facilitating a bulky goods (restricted retail) precinct that is convenient to the Bacchus Marsh community and able to accommodate large footprint retail uses.
- At Clause 11.03-1L 'Activity Centres', under 'Strategies' reference to facilitating development of the activity centres as shown on the Activity Centre Plan (Bacchus Marsh Region) in the Planning Scheme (see Figure 5.2 following). The Activity Centre Plan (Bacchus Marsh Region) shows the location of a '*potential bulky goods precinct (location indicative only)*' at the intersection of Fiskin Street and Geelong-Bacchus Marsh Road.
- At Clause 17.02-1L 'Business' the inclusion of a new policy that relates specifically to bulky goods.

The new policy that is proposed for inclusion in relation to Bulky Goods states the following.

'Direct restricted retail development to a bulky goods precinct in Bacchus Marsh that:

- *Has convenient access to Geelong-Bacchus Marsh Road.*
- *Is efficiently serviced and well connected.*
- *Has a total area of at least 10-12 hectares.*

Require development in the future Bacchus Marsh bulky goods precinct to enhance the local environment through:

- *Site responsive design that is attractive and provides visual interest.*
- *Built form addressing streets and other public spaces.*
- *Locating active uses on the ground floor, and providing active frontages.*
- *Providing landscaping in setbacks from the public realm, and within car parking areas.*
- *Locating loading bays and service areas away from public streets, public spaces and adjoining sensitive uses.*
- *Minimising impacts on use and development in the surrounding area, including potential impacts on local character and amenity'.*

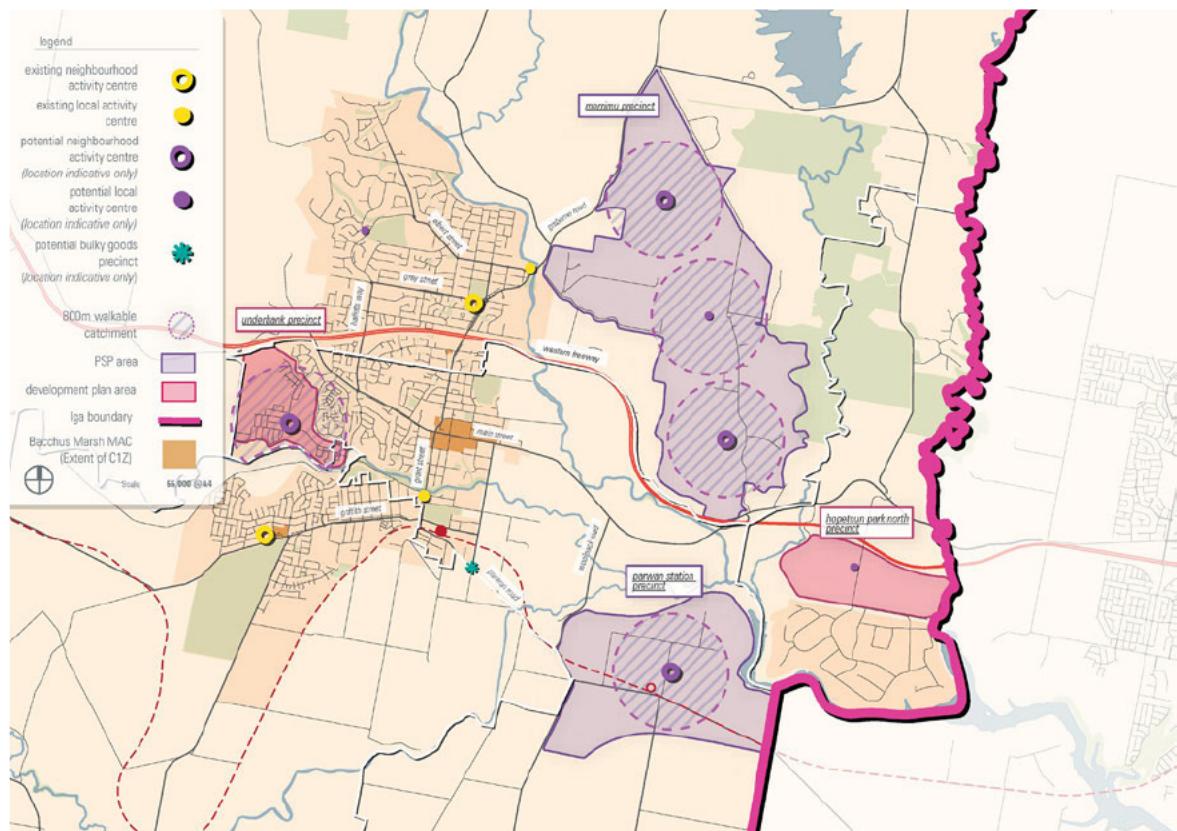


Figure 6.1 Clause 11.03-1L Activity Centre Plan (Bacchus Marsh Region)

7 Key Submissions

10EMRI has three key submissions in relation to Amendment C115moor.

1. The following policy inclusions in relation to bulky goods retailing are strongly supported:
 - at 11.03-1L 'Activity Centres', the location of a '*potential bulky goods precinct*' on the Activity Centre Plan (Bacchus Marsh Region), although it is submitted that the asterisk should be relocated slightly (discussed further below);
 - at Clause 17.02-1L 'Business' the policies in relation to bulky goods, aside from the reference to '*at least 10 to 12 hectares*' as it is considered that a greater area is required (discussed further below).
2. The Retail Strategy and the supporting Background Report underestimate the quantum of bulky goods floorspace that will be required to accommodate future retail demand. Amendment C115moor and the Retail Strategy should be updated to reflect revised bulky goods floor area requirements.
3. The Retail Strategy and Amendment C115moor should be amended to specifically identify the Subject Site as an appropriate location for bulky goods retailing.

These are each discussed in more detail below.

7.1 Support for Policy Inclusions

10EMRI supports the inclusion of policies at Clause 11.03-1L, including the identified location of a '*potential bulky goods precinct*' on the Activity Centre Plan (Bacchus Marsh Region), although is of the view that the asterisk should be relocated slightly (refer Section 7.3 following).

10EMRI is also supportive of the additions to Clause 17.02-1L in relation to bulky goods. The only exception to this is the reference to *at least 10 to 12 hectares*. Whilst it is acknowledged that it does say 'at least' it is considered that a greater minimum floor area should be included here given the comments below in relation to the floorspace assumptions/allowance.

10EMRI submits that a greater allowance for bulky goods floorspace should be nominated at Clause 17.02-1L.

7.2 Underestimates of bulky goods retailing requirements

10EMRI has concerns about some of the assumptions used in the model for the bulky goods floorspace assessment, as outlined below.

- Per capita spending on bulky goods appears to be low based on preliminary economic advice provided to 10EMRI on the Retail Strategy. When this is combined with the relatively high estimate of online spending proportions by 2041, the supportable floorspace level is considered conservative and could be substantially higher under less conservative assumptions.
- The modelling does not take into account any other retail and non-retail uses that often co-locate with bulky goods centres and restricted retail precincts, especially in regional towns and cities (it is understood that an assessment for Parwan included an allowance of 50% additional land to account for this).
- There is very limited capacity to accommodate 20% of bulky goods floorspace demand in the town centre – this should be reallocated to a bulky goods precinct in the Bacchus Marsh context.
- Although the Retail Strategy suggests that allowing 10ha for a bulky goods centre would be considerably higher than demand, it is considered that catering for the estimated need for 24,000sqm by 2061 would

require at least 10ha. This does not then allow any contingency, especially if a larger floorplate retailer was attracted. For example, contemporary Bunnings Stores generally occupy at least 3 to 4 hectares alone (10,000sqm – 15,000sqm+ floorspace), which would absorb a substantial proportion of the initial land allocation if such a store was attracted to Bacchus Marsh. In this regard it is noted that a Bunnings has been approved on the mixed use zoned land at 30 Fiskin Street site (north east corner of Geelong- Bacchus Marsh Road and Fiskin Street) and so that scenario is already in play.

With the above in mind, 10EMRI submits that there should be a review of the assumptions made in relation to bulky goods floorspace, and Amendment C115moor (at Clause 17.02-1L) and the Retail Strategy amended accordingly to reflect the outcomes of that review.

7.3 Specific reference to the Subject Site in the Retail Strategy and Amendment C115moor for future bulky goods development

It is 10EMRI's submission that the Subject Site at Maddingley is the most appropriate location for Bacchus Marsh's bulky goods retailing precinct, highlighting the following.

- The Subject Site responds appropriately to the various desirable locational criteria for a bulky goods precinct as set out in the 2016 Retail Strategy, 2018 Bulky Goods Assessment, the Retail Strategy itself and the policy changes proposed as part of Amendment C115moor
- The Essential Economics Bulky Goods Assessment has already assessed the Subject Site against the locational criteria set out in the 2016 Retail Strategy and determined that it suitably met these criteria.
- The Centrum Maddingley Planning Study also considered the Subject Land and found that the Commercial 2 zone was a preferred future outcome for the site (or alternatively Industrial 3).
- The Subject Site is located on an arterial road (500 metre frontage) that is highly trafficked and has excellent visibility to passing traffic.
- It has excellent road links to Bacchus Marsh town centre via either Grant or Fiskin Street.
- It is located in proximity to both the existing Bacchus Marsh urban area and the Bacchus Marsh train station (only 200 metres) and can therefore easily service the existing population of Bacchus Marsh, consistent with the policy direction of Clauses 2.03-7 which seeks to facilitate a bulky goods precinct '*that is convenient to the Bacchus Marsh community*'.
- The Subject Site will also be easily accessible to the future growth areas to the east and to the Eastern Link Road when it is eventually developed. It is already connected to necessary infrastructure.
- It is of adequate size to accommodate a bulky goods precinct.
- It is mostly flat farming land that is not expected to have any significant ecological constraints given its current cropping uses
- It is contiguous with the existing Maddingley urban area and has good access to utility services.

With the above in mind, it is submitted that the Retail Strategy and Amendment C115moor should specifically identify the Subject Site as an appropriate location for bulky goods retailing.

In the case of Amendment C115moor this should involve a minor change to the Activity Centre Plan at Clause 11.03 to show the asterisk identifying 'potential bulky goods precinct' located directly on the Subject Site rather

than centrally across the Geelong-Bacchus Marsh Road and Fiskin Street intersection, and ordinance changes at Clause 17.02-1L as appropriate.

In the case of the Retail Strategy, it should be amended to ensure that it is consistent with the policies in the Planning Scheme and to identify the Subject Site specifically as an appropriate location for bulky goods in the short to medium term.

8 Conclusion

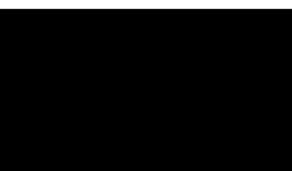
In conclusion, it is submitted that:

- Clause 11.03-1L 'Activity Centres' and the location of a '*potential bulky goods precinct*' as shown on the Activity Centre Plan (Bacchus Marsh Region) is supported (subject to the slight relocation of the asterisk as discussed in the previous section), as is Clause 17.02-1L 'Business' in relation to bulky goods (aside from the reference to '*at least 10 to 12 hectares*').
- The Retail Strategy and the supporting Background Report underestimate the quantum of bulky goods floorspace that will be required to accommodate future retail demand. Amendment C115moor and the Retail Strategy should be updated to reflect revised bulky goods floor area requirements.
- The Retail Strategy and Amendment C115moor should specifically identifying the Subject Site as an appropriate location for bulky goods retailing.

Should this matter proceed to a Panel Hearing we look forward to reviewing any submissions made in respect of the Amendment and responding appropriately, and to addressing any new matters that may arise in the intervening period.

We would be happy to discuss the above with you. Please do not hesitate to contact either the undersigned via phone on [REDACTED] or email [REDACTED] or [REDACTED] via email

Yours sincerely



[REDACTED]
Director, Major Projects and Approvals



Department of Transport and Planning



Ref: [REDACTED]

Ms Kate Barclay
Manager Growth and Development
Moorabool Shire Council
PO Box 18
BALLAN VIC 3342

Dear Ms Barclay

PLANNING SCHEME AMENDMENT C115MOOR – MOORABOOL SHIRE RETAIL STRATEGY 2024 STATUTORY RECOMMENDATIONS PUBLIC EXHIBITION REVIEW

Thank you for notifying the Head, Transport for Victoria (Head, TfV) on 27 October 2025 of the Planning Scheme Amendment C115moor Moorabool Shire Retail Strategy 2024 which gives effect to the principles and recommendations of the strategy.

The Head, TfV is a statutory authority established by s64A of the *Transport Integration Act 2010* responsible for coordinating, providing, operating and maintaining the public transport system, the freight rail network and the road system in Victoria.

The Head, TfV has reviewed the documentation provided in relation to the Amendment and has no objection to the Amendment, subject to changes to the ordinance outlined in Appendix 1.

Should you have any enquiries regarding this matter, please contact [REDACTED], Transport Planner via e-mail at [REDACTED]

Yours sincerely



[REDACTED]
Associate Director Regional Operations - Planning
Barwon South West and Grampians

Date: 27/11/2025

Appendix 1 - Proposed Changes to Ordinance

Clause	Exhibited Ordinance Wording	Proposed Head, TfV Changes	Justification
11.03-1L Activity Centres	N/A	<p>Add proposed wording under Strategies as below;</p> <p>Bacchus Marsh</p> <p>Ensure the bulky good precinct facilitates an efficient, coordinated and safe connection to road network and operation of Geelong-Bacchus Marsh Road.</p> <p>This must be achieved by restricting direct property access, and limiting access points by utilising urban design techniques to consolidate access points such as service roads and internal connector roads to Geelong-Bacchus Marsh Road.</p>	<p>To ensure the safe and efficient operation of Geelong-Bacchus Marsh Road by restricting or consolidating direct property access.</p>
17.02-1L Business	<p>Direct restricted retail development to a bulky goods precinct:</p> <p>Has convenient access to the Geelong-Bacchus Marsh Road</p>	<p>Direct restricted retail development to a precinct:</p> <p>With convenient and safe access to the Geelong-Bacchus Marsh Road subject to approval from the Head, Transport for Victoria.</p>	<p>The Head, TfV requires further engagement for any development adjacent to an arterial road to ensure that the safety and efficiency of the arterial road network is not compromised. Any such development will be required to provide a Transport Impact Assessment (TIA) to the satisfaction of the Head, TfV.</p> <p>Furthermore, determination of the</p>

			site for any future bulky goods precinct will need to be done in consultation with the Head, TfV.
18.01-3L Sustainable Personal Transport	<ul style="list-style-type: none"> - Create a pedestrian and cycle spine between Main Street, Bacchus Marsh, and the Railway Station - Create a pedestrian and cycle spine between Inglis Street, Ballan and the Ballan South growth areas 	<ul style="list-style-type: none"> - Create a pedestrian and cycle <u>link</u> between Main Street, Bacchus Marsh, and the Railway Station - Create a pedestrian and cycle <u>link</u> between Inglis Street, Ballan and the Ballan South growth areas 	<p>The Head, TfV is supportive of providing strong active transport connections to key destinations within Bacchus Marsh and Ballan, and minimising and consolidating crossings where possible. The Head, TfV recommends early engagement when planning for active transport links to ensure the safety and connectivity of the new infrastructure.</p> <p>The Head, TfV suggests the replacing "spine" with "link" in the ordinance wording to reflect current industry terminology.</p>
N/A	N/A	<p>It is recommended that the list of policy documents included throughout the ordinances are updated to reflect current or updated plans, including but not limited to:</p> <ul style="list-style-type: none"> - Plan for Victoria / Plan Melbourne - Victorian Freight Plan 2025-30: Victoria Delivers 	To ensure current policy documents are referenced.

(2025) /
Delivering the
Goods, Creating
Victorian Jobs:
Victorian
Freight Plan
(2018)



Amy Gloury

From: [REDACTED]
Sent: Friday, 28 November 2025 4:20 PM
To: info@moorabool.vic.gov.au
Cc: Liam Prescott; Ross@urbanld.com.au
Subject: Amendment C115moor Submission - Inverlochy Property Holdings
Attachments: [REDACTED] Submission to AmendmentC115moor_V1.pdf

Categories: [REDACTED]

Good afternoon,

Please find attached a submission to Amendment C115moor on behalf of Inverlochy Property Holdings.

We look forward to your consideration of our submission.

Regards

[REDACTED]

[REDACTED] [REDACTED]
Director, Technical Lead - Planning



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28 November 2025

Liam Prescott
Moorabool Shire Council
PO Box 18
Ballan VIC 3342

**Re: Submission to Amendment C115moor
92-98 Main Street, Bacchus Marsh**

Dear Liam,

1 Introduction

EMM Consulting Pty Ltd (EMM) continues to act on behalf of Inverlochy Property Holdings (IPH), owner of the property known as 92-98 Main Street, Bacchus Marsh (Subject Site). The property is in two titles covering approximately 8,000 square metres of land immediately adjacent to the western edge of the Bacchus Marsh Town Centre (BMTC) which is identified as a Major Activity Centre (MAC) in the Moorabool Planning Scheme.

As you would be aware, IPH has been liaising with Moorabool Shire Council (Council) for some time seeking the opportunity to have this land included within an expanded BMTC. Accordingly, EMM is pleased to lodge this submission on behalf of IPH in relation to Amendment C115moor to the Moorabool Planning Scheme, which seeks to implement the findings of Moorabool Retail Strategy 2024 (the Retail Strategy) and the supporting Moorabool Retail Strategy Background Report 2024 (the Background Report).

This submission is supported by a memorandum from Urban Enterprise which provides peer review comments on an earlier version of the Strategy and Background Report – noting that none of the matters to which the comments relate have changed significantly between the earlier versions of these documents and those now forming part of Amendment C115moor.

2 Subject Site and Surrounds

2.1 Subject Site

The Subject Site comprises of land in two adjacent lots with a combined area of 7,897 square metres, on the north side of Main Street just west of its intersection with Gisborne Road. The land is roughly rectangular in shape and slopes generally from north-west to south-east, with a primary frontage to Main Street of approximately 77 metres. The land is vacant, with no significant vegetation.

2.2 Surrounds

To the east, the Subject Site abuts the historic Blacksmiths Cottage and Forge Bookbarn, which is located on the north-western corner of the intersection of Main Street and Gisborne Road. These buildings are used as a museum and retail store respectively, despite being located on land in a residential zone. North of these buildings and also abutting the Subject Site is land within the official boundary of the BMTC (i.e. zoned Commercial 1), used as an SES depot.

To the north the land slopes upward, and the Subject Site abuts open space on land owned by the Anglican Church. Part of the northern boundary also abuts a car wash.

To the west, Convent Lane runs along the entire length of the Subject Site. Beyond this is a dwelling and outbuildings in an elevated location, and north of this, undeveloped parts of land at the rear of several lots.

South of the Subject Site is Main Street, approximately 20 metres wide in this location. On the opposite side of the street are a number of commercial buildings and a fire station, on land zoned Commercial 1 and Public Use 1 respectively.

3 Moorabool Planning Scheme

Relevant policy directions of the Moorabool Planning Scheme (the Planning Scheme) in relation to retail land uses and the town centre include the following.

- **Clause 11.03-1L Activity Centres**, which identifies the BMTC as the only MAC in Moorabool, and which includes as a strategy the need to '*reinforce the commercial hub role of Main Street through the intensification of a mix of retail, commercial and leisure land uses, within a walkable environment*'.
- **Clause 17.02-1S Business**, which includes as strategy '*to encourage development that meets the community's needs for retail, entertainment, office and other commercial services*'.

From a zoning and overlay perspective the land is zoned General Residential 2. The overlays that apply to the land can be summarised as follows.

- Design and Development Overlay Schedule 15 which relates to the Bacchus Marsh Hospital Emergency Medical Services Helicopter Flight Path Protection (inner area).
- Heritage Overlay Schedule 8 which relates to the Former Blacksmith's Cottage and Shop at 100 – 102 Main Street and which appears to affect the eastern boundary of the site.
- Land Subject to Inundation Overlay which affects only the eastern boundary of the site.
- Specific Control Overlay Schedule 2 which relates to the Hospital Emergency Medical Services – Helicopter Flight Path protection Areas Incorporated Document June 2017.

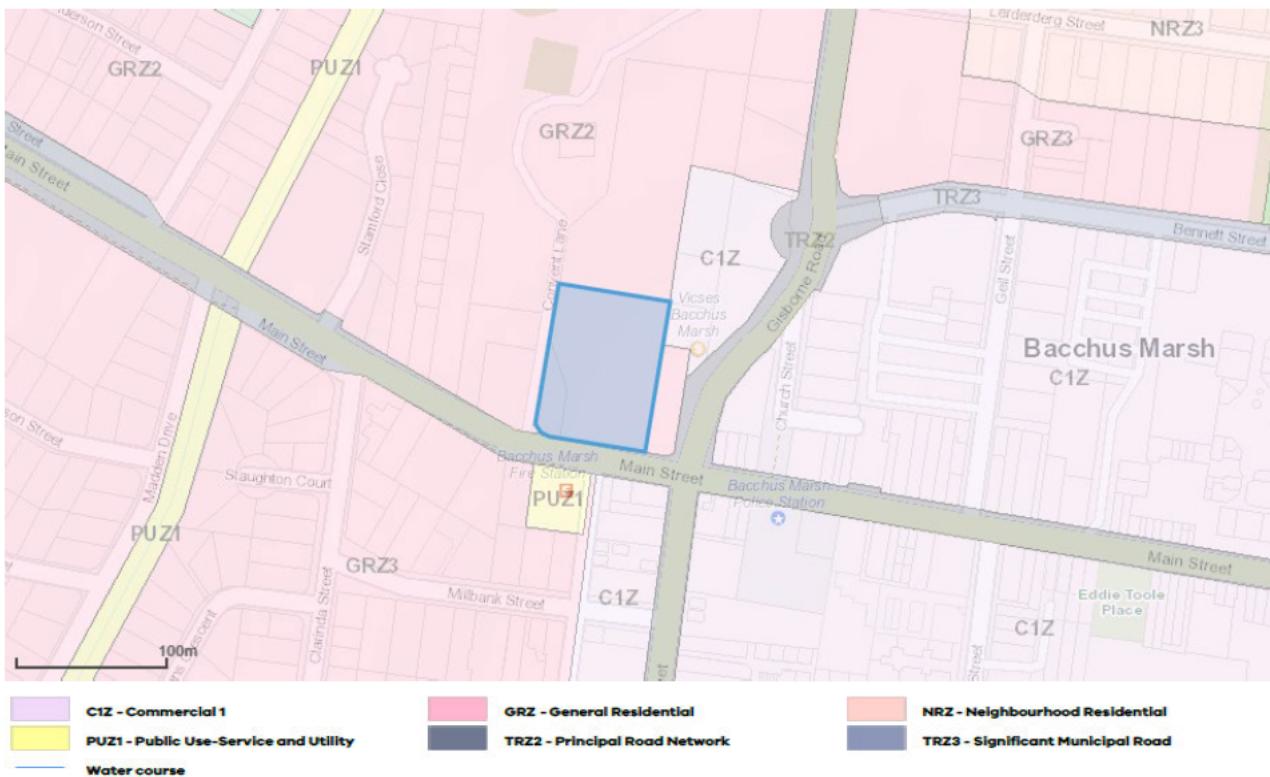


Figure 3.1 Zoning map extract with Subject Site boundaries indicated in blue, VicPlan

4 Bacchus Marsh Town Centre Structure Plan, 2024

The Bacchus Marsh Town Centre Structure Plan 2024 (the Structure Plan) was adopted by Council on 11 September 2024. The Structure Plan is referred to in the Retail Strategy (see further discussion in the following section). The Structure Plan includes the Subject Site in the Study Area boundary of the Structure Plan and nominates it as a Key Redevelopment Site, refer to Figure 4.1 on the following page.

In relation to the future development of the BMTC it states the following on page 18 (our underlining):

Currently vacant sites and developable land amounts to around 5 hectares. If some of this land is not available for development there may be a small shortfall. This shortfall could be met in a variety of ways, including multi-storey development, reduction in car-parking requirements and improved efficiency of development. In addition, there is potential to increase development by removing the shop floorspace cap on land in the Town Centre that was formerly zoned Business 2 (B2Z).

However, it would be prudent to investigate potential future extensions of the Town Centre for longer term commercial development. This should include the investigation of 92-98 Main Street, a vacant parcel of 0.8 ha west of the intersection with Gisborne Road as potential future commercial land. However, any potential rezoning of such land would need to be subject to the resolution of specific matters relating to: timing and demand for additional commercial land, site access, traffic movement, built form/interface and land use mix.

Monitoring of development and population growth in the Bacchus Marsh catchment will need to be ongoing, with adjustments to forecasts and land requirements made regularly.

Figure 3: The Structure Plan

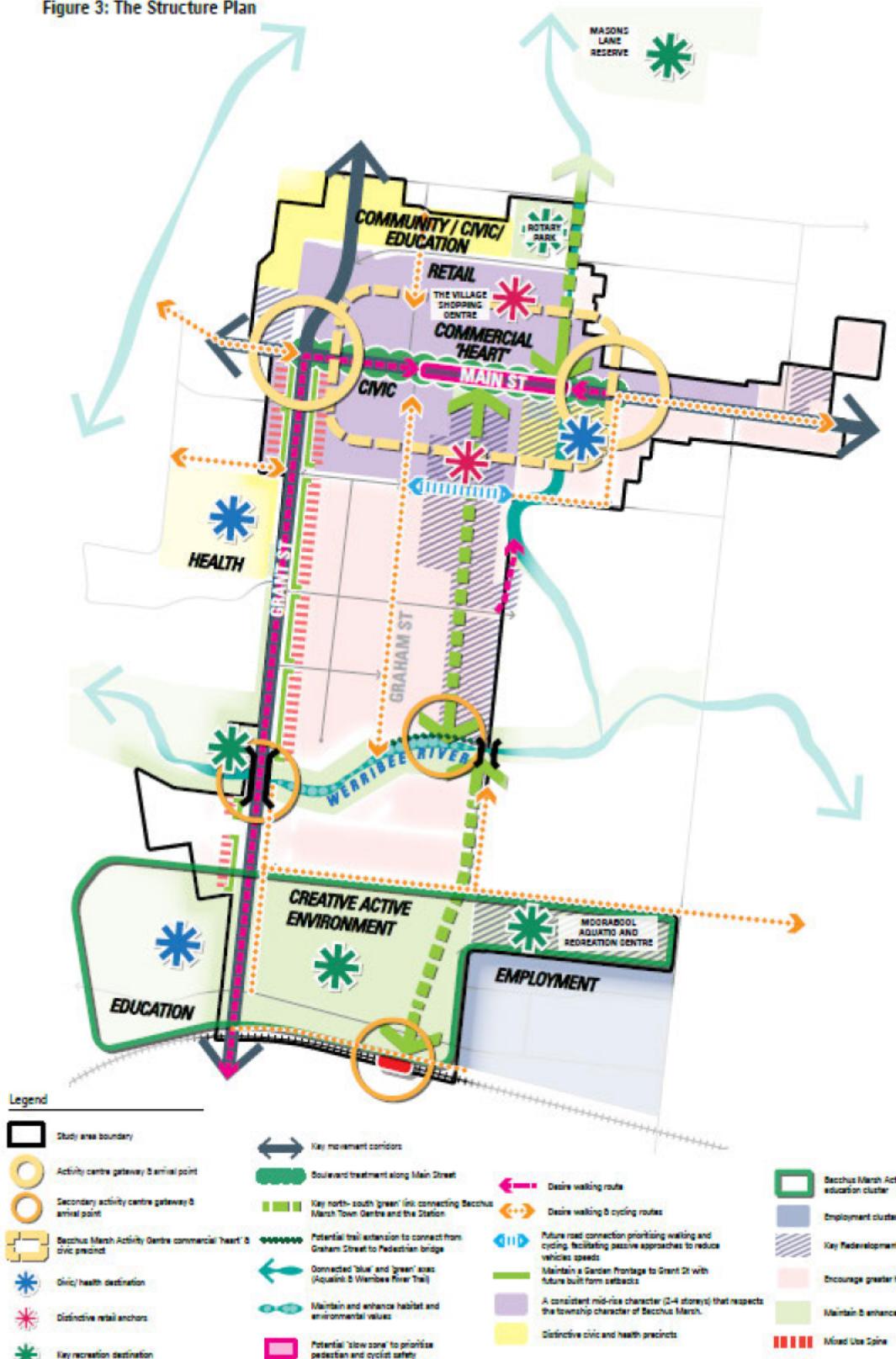


Figure 4.1 Bacchus Marsh Town Centre Structure Plan

It then states the following at Section 9.1 Implementation as a 'Short to medium term' Action 1.3, which is the responsibility of the property owner:

Identify 92-98 Main Street as potential future commercial land (note: rezoning to be subject to the resolution of specific matters relating to: timing and demand for additional commercial land, site access, traffic movement, built form/ interface and land use mix.

It is understood from discussions with Council that a separate amendment is proposed to implement the findings of the adopted Structure Plan, and that the amendment is expected to progress in 2026.

5 Other relevant background strategic planning documents

5.1 Moorabool Retail Strategy 2041 (March 2016)

Council released its current Retail Strategy in 2016 (2016 Strategy), which was intended to inform commercial land use needs in the shire until 2041. The 2016 Strategy projected that by 2031 the retail land needs of Bacchus Marsh (including bulky goods retailing) would exceed the land available within the existing BMTC footprint.

The recommendations of the 2016 Strategy included the following.

- Identification and preservation of available development sites within the BMTC, particularly large sites for stores with large footprints (i.e. a supermarket or department store), including through the amendment of the Moorabool Planning Scheme.
- Prioritise use of the scarce land within the BMTC for traditional retail and establish an out-of-centre bulky goods centre elsewhere, in part to address the lack of land within the BMTC.

5.2 Bacchus Marsh Urban Growth Framework Plan, Moorabool Shire Council and Victorian Planning Authority (August 2018)

Developed jointly by the Victorian Planning Authority (VPA) and Moorabool Shire Council, the Urban Growth Framework Plan (UGF) is, in its own words, '*a strategic document that will guide growth to 2041 and beyond*'.

In relation to the BMTC, the UGF states that '*Much of the additional retail floor space needed in coming years will be delivered in the Bacchus Marsh town centre. In order to accommodate this additional floor space, a framework is needed to clearly define priorities for future land use planning, design and renewal within the town centre. This will address the two key issues of traffic congestion and the lack of a town centre 'heart'*'.

5.3 Bacchus Marsh Retail and Economic Assessment, HillPDA (2023)

This Assessment was prepared jointly for the VPA and Moorabool Shire Council. The Assessment appears to have been undertaken at the same time as the draft Retail Strategy however neither document refers to each other (although the draft Strategy appears to reference a 2021 version of this report).

In relation to the Bacchus Marsh Town Centre, the Assessment states on page 36 that the following:

'Bacchus Marsh Town Centre could double in size based on demand growth in the region over the next 20 years, assuming land and floorspace capacity is available for the centre to expand and develop.

The lack of readily available land for growth has been identified as a constraint in previous planning studies. This presents a risk of a large competing centre (or centres) being established in greenfield areas in conflict with policy for the town centre to be maintained as the primary centre in the region'.

If the town centre was to double in size then in terms of floor area this would represent an additional 24,000 square metres of retail space being needed by 2041, compared with the draft Strategy estimate of an additional 10,800 square metres being needed in the town centre.

6 Amendment C115 Ordinance

The Explanatory Report for Amendment C115moor states that the Amendment seeks to implement the *Moorabool Shire Retail Strategy 2024*. It seeks to do this by updating the hierarchy of retail activity centres to reflect new and emerging residential growth areas already identified in the scheme, and updating various economic and retail guidance throughout the scheme.

The Amendment seeks to ensure that new residential areas are well serviced by retail centres, and that there is appropriate retail expansion in the small towns and villages. It also supports the provision of a wider range of goods and services in appropriate locations.

The Explanatory Report describes the Amendment as proposing the following changes to the Moorabool Planning Scheme.

- *Amend Clause 02.03-1 Strategic Directions to describe Bacchus Marsh as a Major Activity Centre and include updates to Ballan and Small Towns and Settlements sections.*
- *Amend Clause 02.03-7 Economic Development to include minor changes to existing policy.*
- *Amend Clause 11.01-1L-03 Ballan to remove Ballan Town Centre strategies.*
- *Amend Clause 11.03-1L Activity Centres to include an updated Retail Centre Hierarchy and add Ballan Town Centre strategies.*
- *Amend Clause 17.02-1L Business to add strategies for Bungaree and Gordon and expand on the existing bulky goods strategy.*
- *Amend Clause 17.04-1L Tourism to include local strategies derived from the Visitor Economy Strategy 2024.*
- *Amend Clause 18.01-3L Sustainable personal transport to provide support for a pedestrian-bicycle link between a future Ballan South neighbourhood activity centre and Inglis Street.*
- *Amend the Schedule to Clause 34.01 Commercial 1 Zone to update 1.0 Maximum leasable floor area requirements based on the Retail Strategy assessments.*
- *Amend the Schedule to Clause 72.08 Background Documents to include new background documents Moorabool Shire Retail Strategy 2024 (Tim Nott with Hansen Partnership, 2024), Moorabool Shire Economic Development Strategy 2023-2027 (Urban Enterprise, 2024), and Moorabool Shire Visitor Economic Strategy 2023-2027 (Urban Enterprise, 2024).*
- *Amend the Schedule to Clause 74.02 Further strategic work to remove the Retail Strategy update and add an urban design framework or structure plan for Ballan town centre.*

7 Amendment C115moor and the Bacchus Marsh Town Centre

7.1 Retail Strategy 2024

The Retail Strategy will replace the existing Moorabool Shire Council - *Retail Strategy 2041*, by Macroplan Dimasi (March 2016) and is intended to take into account and address the planned expansion of urban development proposed around Bacchus Marsh and Ballan.

The Retail Strategy continues to identify the Bacchus Marsh Town Centre as the only MAC in Moorabool Shire, consistent with long established retail planning policies that seek to ensure the primacy of town centres in regional areas. In the words of the Background Report, BMTC provides '*the closest full-line supermarket and significant comparison goods shopping for the eastern half of the Moorabool Shire and is by far the largest activity centre in the municipality*'.

The Retail Strategy and Background Report project retail land needs until 2041, identifying that an additional 10,800 square metres of retail floor space will be required by 2041 and that a similar area will be required for non-retail commercial and community services. Allowing for parking, the Retail Strategy states that there will be a need for potentially 4.9 hectares of land to accommodate these requirements to 2041. The Retail Strategy notes that in 2021 this demand was matched by a supply of 5 hectares in vacant sites and developable land, although noted that the area calculations did not take into account the potential for higher density housing.

In relation to the expansion of the town centre (comprising the land zoned C1Z) the Retail Strategy states that:

'Expansion of the Commercial 1 Zone within the town centre is likely to be required over the longer term, as the currently vacant land is developed, particularly considering that on the forecasts for this Strategy, a further 4 to 5 hectares of land may be required to accommodate growth over the period 2041 to 2061'.

The Retail Strategy then goes on to state the following:

'In looking at the total demand for land, it is also instructive to understand the types of activities that may require space in the town centre.

Some uses, such as significant supermarkets and discount department stores, both of which are likely prospects for the town centre, require large floorplate and extensive carparking. Sites to accommodate such uses are very limited.

In the preparation of the BMTC Structure Plan, recommendations in this Retail Strategy can be included in the town centre work to address the need to maintain and improve a vibrant commercial precinct that has sufficient space to cater to the needs of the growing community'.

One of the six 'actions' listed in the Retail Strategy for the BMTC is:

'Implement the key findings and recommendations from this Strategy relating to the Bacchus Marsh Major Activity Centre through the Bacchus Marsh Town Centre Structure Plan'.

The Background Report also identifies that the '*expansion of the Commercial 1 Zone to grow the extent of the town centre*' will be necessary to accommodate the requirement for additional land in the BMTC. It then identifies two sites as '*substantial vacant development sites*' one of which is the Subject Site at 92-98 Main Street and the other being land to the south of Main Street, between Council's library car park and Graham Street (the Provenzano land).

The Background Report then nominates at Section 4.9.1 and in Figure 4-7 of the Background Report, the two sites as potential sites for further investigation (refer Figure 5.1 following).

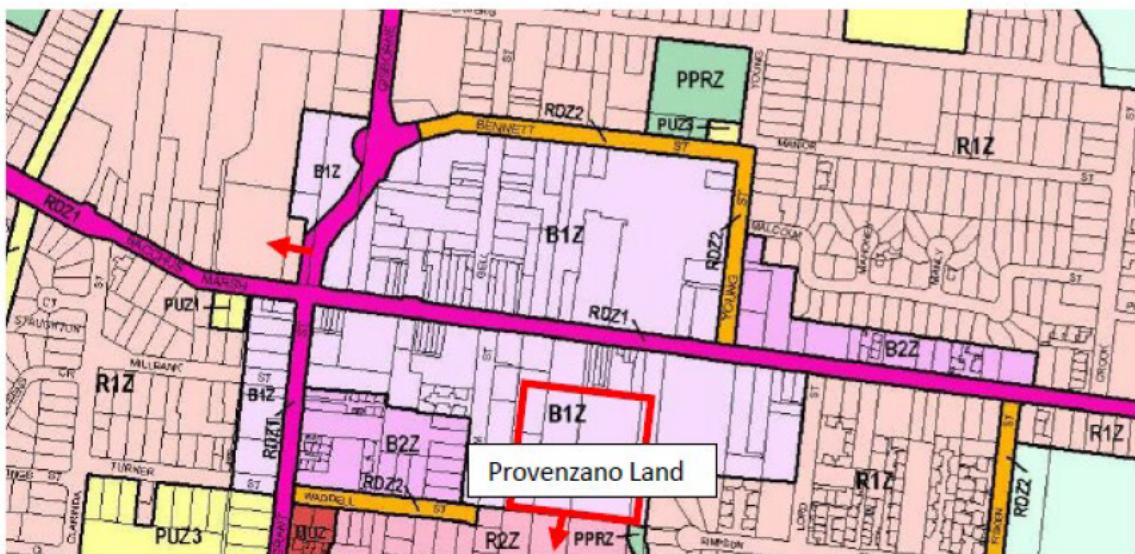


Figure 6.1 Map showing direction for C1Z expansion of BMTC, as shown at Figure 4-7 of Retail Strategy Background Report

In relation to these two expansion options the Background Report notes the following (page 64).

'These parcels may well be required in the longer term, that is, beyond 2041, or if development rates are higher than forecast or current vacant land is not available for development.'

'Over the entire forecast period, from 2021 to 2061, the town centre may need to find 8 to 10 hectares of additional space for new activities'.

7.2 Planning Scheme Ordinance

Key changes that are proposed to the Planning Scheme ordinance to implement the findings of the Retail Strategy, and that are of relevance to the BMTC and the subject site can be summarised as follows:

- At Clause 02.03-1 'Settlement' reference to the BMTC as a Major Activity Centre that will generate opportunities for expanded services.
- At Clause 02.03-7 'Economic Development' reference to providing a diverse range of retail, hospitality, personal and community services, particularly in Bacchus Marsh as an identified regional service centre.
- At Clause 11.03-1L 'Activity Centres', under 'Strategies' reference to facilitating development of the activity centres as shown on the Activity Centre plans in the Planning Scheme (see Figure 5.2 following).
- Also at Clause 11.03-1 'Activity Centres', under Bacchus Marsh again referencing the commercial hub role of Main Street.

There is no reference in the Planning Scheme ordinance to the two sites nominated as being expansion options.

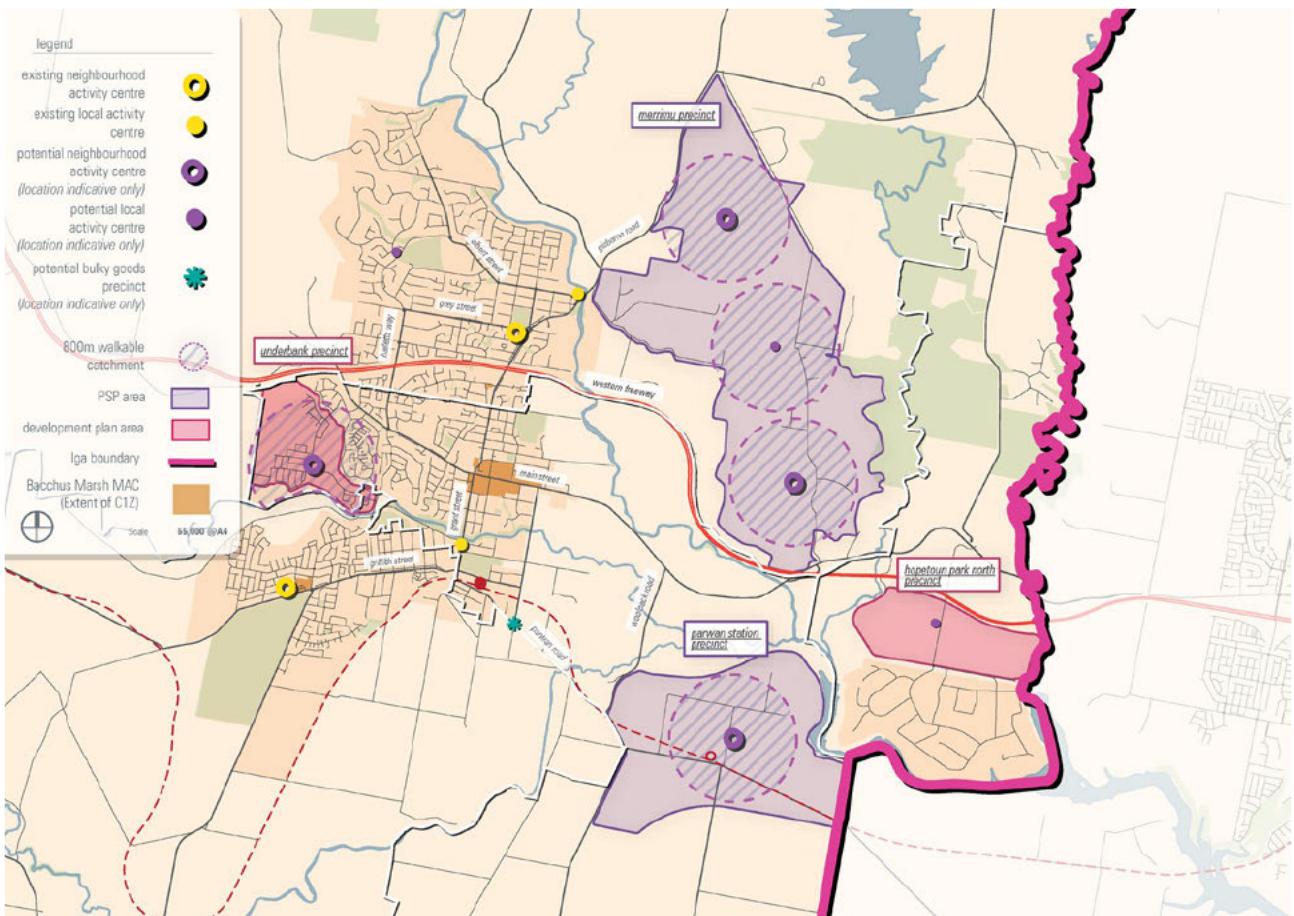


Figure 6.2 Activity Centre Plan (Bacchus Marsh Region)

8 Key Submissions

IPH has four key submissions to make in relation to Amendment C115moor.

1. The Retail Strategy and the supporting Background Report underestimate the quantum of floorspace that will be required in the town centre to accommodate future retail demand.
2. The Retail Strategy and supporting Background Report overestimate the capacity of the existing town centre to accommodate future retail floorspace requirements within existing Commercial 1 Zone (C1Z) land.
3. Amendment C115moor and the Retail Strategy, erroneously, do not provide for any expansion of the BMTC C1Z zoned land.
4. Amendment C115moor and the Retail Strategy should be updated to include the subject land as an extension to the town centre, as identified in the Background Report and Structure Plan.

These are each discussed in more detail below.

8.1 Conservative estimates of future floorspace requirements

The Retail Strategy and Background Report make a number of assumptions that, combined, result in the estimates regarding retail floor space and associated land area requirements within the BMTC to be overly

conservative. This in turn results in land supply not being addressed appropriately as discussed further in Section 7.2.

As set out more fully in the Urban Enterprise memorandum, the following assumptions in the modelling contained in the Background Report result in conservative estimates about future retail floorspace requirements:

- per capita retail spending is estimated at rates approximately 6% lower than Urban Enterprise's estimates;
- the model assumes no real growth in spending over time;
- the model assumes continuing strong increases in internet provision of retail services compared to the present.

Further, where estimated retailing activity is converted into average retail floorspace and land requirements the following concerns are noted by Urban Enterprise:

- no contingency is made for potential unforeseeable increases in demand due to future uncertainty about retailing trends, or for the 5-6% tenancy vacancy rate which is considered to be economically optimal (as compared to the existing 2% vacancy rate);
- contingencies for landscaping and circulation are estimated at 10%, however Urban Enterprise recommends a contingency of 20% for these factors as well as encumbrances and other setbacks and development issues that may be required on planning grounds.

Given the above, IPH submits that the Retail Strategy should amended to reflect the revised floorspace requirements, as assessed by Urban Enterprise.

8.2 Overly generous assumptions about the capacity of existing land supply within the BMTC

In relation to land supply, the Retail Strategy and Background Report estimate the need for 4.9 hectares of additional development land for commercial uses in the BMTC by 2041. The Retail Strategy doesn't consider there is a need to expand the footprint of the MAC before 2041, stating that land requirements until this time can be met via a range of methods including: development of the Provenzano site, denser redevelopment (including additional upper floors) of existing buildings and the consolidation and removal of car parking.

However, this overly optimistic assessment ignores the reality of how practical the identified land would be to develop into retail uses, highlighting the following.

- Some vacant land is subject to inundation and may present undesirable risks for developers.
- The Provenzano site has been vacant for many years, despite approaches from large retailers, and there is no guarantee it will become available for development in the future.
- The removal or selling off of Council owned land is likely to be challenging, both because of existing constraints on car parking supply in the BMTC (if it is land currently used for car parking that is sold) and because there are other public land uses the Council land could be put to (if not car parking), including accommodating Council offices or other community/civic land uses.
- Any proposed reduction in car parking requirements for new developments in the town centre is highly unlikely to be supported by the community given existing challenges associated with car parking congestion in the town centre. Thus, the potential to increase the capacity of individual sites by either rationalising car parking or reducing car parking requirements is highly unlikely to occur.

- Almost all businesses prefer ground floor frontages on high-footfall frontages and are unlikely to find premises on an upper floor or within the residential area south of Main Street attractive.
- The land (previously zoned B2Z) where existing floorspace caps are proposed to be removed is currently primarily used and developed for residential purposes with significant dwellings developed. It is unlikely to be economically viable to assemble these comparatively small lots for redevelopment, especially in a suboptimal location away from Main Street.
- It is considered unlikely that tenants will be willing to downsize to more space-efficient premises as the Retail Strategy hopes, due to the overheads and fit-out costs of doing this. Even in the event this does happen it is unlikely to yield significant additional floorspace.
- The Retail Strategy erroneously assumes the two new major growth areas of Parwan and Merrimur will have a retail offer from day 1. The reality is that each growth area will need to achieve a population of approximately 5,000 residents before a major anchor supermarket will be prepared to commit to a retail tenancy making a retail offer viable. Such a population may take between 8-10 years to achieve. In the interim, the demand from both growth areas will be heavily reliant on the Bacchus Marsh town centre to cater for this demand and this is not factored into the supply and demand analysis.

With the above in mind, IPH submits that there should be a review of the assumptions made in relation to the capacity of the town centre to accommodate anticipated future growth, and the Retail Strategy amended accordingly to reflect the outcomes of that review.

8.3 No provision made for the expansion of the town centre

As highlighted above, it is IPH's contention that the Retail Strategy underestimates both the extent of retail floorspace that will be required in the town centre and overestimates the capacity of the existing town centre to accommodate projected needs. The outcome of this is that the Retail Strategy does not provide adequate land to accommodate projected future retail needs.

There is clear strategic support in existing policies of the Planning Scheme to maintain the BMTC as the only MAC in Moorabool and the need to '*reinforce the commercial hub role of Main Street through the intensification of a mix of retail, commercial and leisure land uses, within a walkable environment*'.

Indeed, the Retail Strategy highlights this on page 12, where it states the following.

The Bacchus Marsh Town Centre is the designated Major Activity Centre in the Shire and must grow as a focal point for services and employment if it is to meet the needs of the growing community. The role of the major activity centre in the hierarchy is to provide a wide range of routine comparison goods such as clothes, electronics, and hardware, as well as a strong offering of convenience goods and services i.e. food and groceries, personal services, cafés, restaurants and take-away food. In addition, major activity centres, especially town centres such as Bacchus Marsh, need to provide a wide range of non-retail activities - civic and community services, entertainment, professional services and visitor services

Retail supply and demand is an imprecise science. Retailers can seek to establish a presence in centres earlier than a market expects in some instances and activity centres should be ready to accommodate the retailers needs.

If there is inadequate land to accommodate future retail land uses, including larger scale retail tenancies, this will undermine the central aims of the Retail Strategy in relation to attracting the broadest range and number of retail and commercial uses to the centre. It will also undermine long standing State and local policy that seeks to ensure the primacy of the Bacchus Marsh town centre in the retail hierarchy.

With this in mind, it is submitted that it is imperative that additional land is included in the town centre to ensure it continues to successfully maintain its designated role as Moorabool's MAC and to meet the anticipated needs of both the existing and future population of both Bacchus Marsh and, more broadly, Moorabool Shire.

There is a difference between land that is theoretically available and 'practically' available and so even if there is some vacant land within the current BMTC 'boundary' doesn't mean that it will necessarily be available for development.

The Subject Site is explicitly mentioned at Section 4.6.1 of the Background Report as one of only two vacant substantial development sites in the town centre. Rezoning of the land for commercial purposes is discussed, however, as noted earlier at Section 5, there is no recommendation for the expansion of the BMTC carried over to the Retail Strategy itself.

It is considered that the Subject Site is the most strategically located land for any expansion of the BMTC for several reasons, as follows.

- The land has direct access to Main Street, an arterial road, and is proximate to Gisborne Road, also an arterial road and a primary link to the Western Freeway.
- The land is large and has high visibility on Main Street, making it a highly attractive location to attract further large supermarket/department store retailers, which are specifically sought by the Retail Strategy to reaffirm the role of BMTC as a MAC.
- The land is not flood prone and its development presents low environmental risks.
- The land interfaces with non-residential uses on all sides, except for the existing dwelling to the west. However, this interface is softened by the lane that runs between the properties, the much higher elevation of the residential property, and the location of private open space away from the common boundary.
- If permitted to be used for commercial purposes, the land would form part of an uninterrupted and seamless extension of the existing BMTC retail core, given that the Blacksmiths Cottage and Forge Bookbarn, and properties on the southern side of Main Street, are used for commercial purposes and noting the proposed signalisation of the Grant Street and Main Street intersection.
- If permitted to be used for commercial purposes, any development of the land would also be required to provide associated car parking. This would result in the provision of significant additional car parking opportunities at the western end of the town centre, where currently on-street parking is to be removed as part of the intersection upgrade at Main Street and Gisborne Road.

The inclusion of the Subject Site in the BMTC MAC would provide opportunity for a large scale retailer to locate in the town with a Main Street frontage – an opportunity which is not currently available on any other land in the BMTC. Should that occur, this would have several positive flow-on effects for retail activity, consistent with the Retail Strategy.

The Planning Scheme, at Clause 02.03-7, highlights the need to strengthen the local economy to improve local employment opportunities, meet the needs of residents and reduce escape expenditure. Ensuring that there is adequate land available in the BMTC supports this and will assist in providing a greater diversity of retail uses to strengthen the local economy.

If the MAC is not expanded to include the Subject Site, the opportunity for the site to be used for commercial purposes may well be missed. With the introduction of the Vacant Residential Land Tax IPH will be looking to undertake some form of development of the land in the near future. Should the site not be supported for commercial purposes, and residential development proceed on the land, then the opportunity to expand the MAC along Main Street any further than Gisborne Rd will not be possible.

The Subject Site forms a logical, and necessary extension of the BMTC and this should be reflected in the Amendment C115moor documentation. Accordingly, it is submitted that the C115moor policy changes should be updated to provide for inclusion of the Subject Site in the BMTC.

8.4 Amendment C115moor and the Retail Strategy to be updated

Amendment C115moor and the Retail Strategy should be updated to include the subject land as an extension to the town centre, as identified in the Background Report and Structure Plan and for the reasons outlined above.

This should include changes to Clause 11.03-1L Activity Centres, Bacchus Marsh, to identify the extension as well as an update to the Activity Centre Plan (Bacchus Marsh Region) to show the expansion site on the plan.

The Retail Strategy should similarly be updated to include the site as an extension to the town centre as reflected in the existing recommendations of the accompanying Background Report and the adopted Structure Plan.

9 Conclusion

In conclusion, it is submitted that:

- The Retail Strategy and the Background Report underestimate the quantum of floorspace that will be required in the town centre to accommodate future retail demand and should be updated to address this.
- The Retail Strategy and supporting Background Report overestimate the capacity of the existing town centre to accommodate future retail floorspace requirements within existing C1Z land and should also be updated to address this.
- The Subject Site at 92-98 Main Street represents the most appropriate option for an expansion of the town centre to accommodate the future retail floorspace needs of the town centre, consistent with orderly and proper planning.
- The documentation that forms part of Amendment C115moor, including the Planning Scheme ordinance, the activity centre mapping and the Retail Strategy, should be amended to provide for designation of the Subject Site as an expansion area to the town centre.

Should this matter proceed to a Panel Hearing we look forward to reviewing any submissions made in respect of the Amendment and responding appropriately, including addressing any new matters that arise in the intervening period.

We would be happy to discuss the above with you. Please do not hesitate to contact either the undersigned via phone on [REDACTED] or email [REDACTED] or [REDACTED] via email

Yours sincerely



[REDACTED] r
Director, Major Projects and Approvals
[REDACTED]

Appendix A

Urban Enterprise Peer Review

MEMO

Project	Moorabool Retail Strategy - Review
Client	Inverlochy Property Holdings Pty Ltd
Date	23 February 2024
Subject	Peer Review Comments on Draft Strategy

1.1. ENGAGEMENT

Urban Enterprise was engaged to review the Draft Moorabool Retail Strategy and provide initial peer review comments, as well as commenting on the potential role of 92-94 Main Street Bacchus Marsh in meeting retail and other town centre commercial needs.

1.2. STRATEGY OVERVIEW AND GENERAL COMMENTS

The Draft Retail Strategy applies to all parts of Moorabool Shire and makes recommendations regarding the role and optimal scale of individual retail centres.

The Draft Strategy is informed by an assessment of retail demand and supply prepared by Tim Nott which is included in a Background Report.

The following comments are provided based on an initial review of the demand and supply analysis:

- **Population:**
 - Population estimates and growth rates are generally consistent with those prepared by Forecast ID and Victoria in Future.
 - Projections are shown for individual retail catchments and are not provided for data areas which can be verified (such as Forecast ID areas, SA2 or urban areas) – this prevents detailed verification at the local level.
 - The projections assume that currently identified growth areas are developed and occupied, including those in Parwan Station and Merrimu where planning processes are currently paused due to the identification of endangered species.
- **Retail floorspace demand:**
 - Adopted per capita spending levels appear low at \$14,423 for Moorabool and \$14,822 for Melbourne. UE estimate per capita spending for Melbourne at \$15,700 for comparison.
 - Adopted per capita bulky goods spending appears low at \$2,200 (UE estimates are closer to \$3,000 per capita). A contributor to this is that a greater share of retail spending is now directed to bulky goods centres, which are no longer focused solely on homemaker retailers. This is partly due to the increase in 'category killers' (eg. Rebel Sport, Baby Bunting) and retail setting 'creep' (eg. sports stores, homewares, baby goods, etc increasingly locating in bulky goods centres rather than town centres, often due to a lack of space for larger stores in existing centres).
 - The model assumes no real growth in per capita spending over time. Although this is reasonable given recent evidence, a scenario which considers the impact of real growth could also be considered.

- The model assumes a strong increase in online spending over the period 2021 – 2041, including for food catering and retail services. Although this is possible, if this does not eventuate to the extent assumed, supportable physical retail space will be higher than modelled.
- The combined effect of the above is a relatively conservative projection of the level of floorspace that will be required to meet the needs of the projected population growth. For comparison, the Bacchus Marsh Retail and Economic Assessment (Hill PDA, 2023) notes that the “Bacchus Marsh Town Centre could double in size based on demand growth in the region over the next 20 years, assuming land and floorspace capacity is available for the centre to expand and develop.” (p.36) A doubling of existing retail floorspace in the town centre would result in an additional 24,000sqm of retail space being needed by 2041, compared with the Draft Retail Strategy estimate of an additional 10,800sqm needed in the town centre by 2041 (Background Report, p.60).
- **Supportable floorspace assessment:**
 - A demand allocation model is used to distribute supportable floorspace (Table 4-3). Although the distributions appear broadly suitable, it is not possible to verify the inputs and their relevance to the Moorabool context. There is also a substantial leap between Table 4-3 and Table 4-4 which makes it difficult to follow how the model works in practice (although the results appear logical when considered against the previous tables).
 - The allocation of 20% of bulky goods spending to the Major Activity Centre setting is questionable in the context of Bacchus Marsh.
 - Sales to visitors (p.35) appears high at 25% overall for the municipality, however the SpendMapp data has not been provided so therefore cannot be verified or disputed.
- **Conversion of supportable floorspace to land area:**
 - Table 4-8 converts retail floorspace requirements into overall commercial land required for retail and non-retail commercial space.
 - The assumptions adopted are reasonable, however there are no contingency allowances (in a regional setting, UE would generally include a contingency to allow for potential increases in demand).
- **Comparing land area needed vs land area available in the Bacchus Marsh Town Centre**
 - For core retail requirements in the Bacchus Marsh town centre, the resulting land requirement of 4.9ha is a substantial land area compared with the existing extent of the Commercial 1 Zone. For comparison, the area is roughly equivalent to the area bounded by Main St, Gell St, Young St and Bennet Street (5.3ha).
 - Only one of the ‘vacant’ sites identified in Table 4-9 would be considered by UE to be genuinely ‘vacant’ (the Provenzano site). The other sites (Village SC and Council land) would require redevelopment and/or divestment of land that is currently occupied to some extent.
 - The inclusion of the Council site as commercial land supply is questionable, in the sense that divestment would be needed which can be a complicated and time-consuming exercise in the context of existing public land. The council land is also likely to have several public land use alternatives, such as accommodating council offices and/or accommodating the wide range of other community and civic facilities that will be needed to support population growth in the broader area.
 - In estimating land requirements, no allowance is made for local roads, setbacks, encumbrances, etc, that may be required (especially for a site such as Provenzano which is a large site which is likely to require new infrastructure and possibly internal roads). UE usually applies a contingency amount of at least 20% to account for these areas.
 - The background report and Strategy refer to a range of opportunities to increase the efficiency of existing commercial areas. This type of intensification is advantageous, however in our view the retail strategy should not place any firm reliance on these possible outcomes in the context of a regional town such as BM for the following reasons:

- Occupation of vacant space: vacancy rates are extremely low at 2%, meaning there is effectively no vacant space available to occupy. This indicates that more floorspace will be needed overall to ensure that opportunities are available for new business attraction and establishment within a more balanced market with vacancies of at least 5%.
- Development at upper levels:
 - Almost all retailers, and a large proportion of non-retail commercial uses, are likely to prefer ground floor premises in a regional town centre setting.
 - Mixed-use multi-level development often results in the need to use ground floor space for services, access, storage, parking and so on (if basement space is not possible / feasible), which can actually reduce the space available for retailers.
- Car parking requirement reductions and parking rationalisation:
 - Parking rationalisation could assist in accommodating additional space, however this would require substantial investment and strategic and policy actions from Council which are not set out in the strategy and, as far as we are aware, are not progressed.
 - Parking reductions would theoretically increase the floorspace capacity of individual sites, however in the context of Bacchus Marsh where congestion is already a challenge and public transport is limited, this measure is considered unlikely to encourage a material increase in the space that is delivered in the town centre.
- Removing retail caps on former B2Z land:
 - This action is considered unlikely to facilitate any major increase in retail space given the areas are fully occupied by existing commercial and residential uses (although conversion of some larger properties to retail may be possible along Main Street).
 - The presence of relatively fragmented land and mostly residential land use in the Waddell Street and Graham Street area is likely to limit the opportunity for any material increase in retail floorspace in that area.

1.3. SUBJECT SITE

Inverlochy Property Holdings Pty Ltd owns 92-94 Main Street Bacchus Marsh, a site of 7,888sqm with a 75m frontage to Main Street.

The site is currently within the General Residential Zone and is discussed in the Background report as an option to accommodate future retail and commercial demand as part of an expanded commercial area / zoning.

The following comments are noted in respect of the subject site:

- In land terms, the background report analysis projects a shortfall of 0.9ha of commercial land by 2041. The site is of a similar size to the shortfall (0.79ha).
- The site is one of only 2 vacant sites within or adjacent to the town centre (along with Provenzano) and the only such site with direct frontage to Main Street. From an economic and property perspective, the site is highly strategic in terms of its potential to accommodate town centre uses to respond to the projected growth in demand for goods and services in the Town Centre.
- If the property was included in the Commercial 1 Zone, and adopting the land area conversion assumptions of the background report, a total of 3,500sqm of retail and other commercial space could be accommodated, equivalent to 16% of the projected demand for the Town Centre over the period 2021 – 2041, and just over 3 years supply.
- Given the conservative assumptions regarding retail demand adopted as part of the strategy and strong level of projected population growth, rezoning of the site is highly unlikely to represent an oversupply of commercial land (supply will effectively be exhausted before 2041 under the proposed approach unless major land use intensification is achieved, which is considered unlikely). Including the site in the C1Z now would enable planning, design and commercial arrangements to be prepared over the coming years.

- There is policy support for the Bacchus Marsh Town Centre to continue to perform the highest-order role of all activity centres in the municipality, and the strategy notes the lack of strategic sites available to accommodate larger land uses and retailers. This points to the need for developable land, especially sites that have flexibility to accommodate contemporary retail developments and larger footprints. For example, larger retailers such as supermarkets and discount department stores generally require floorplates of at least 3,000sqm and land areas of at least 1ha, while mini-major retailers usually require at least 1,000sqm and 0.3ha of land. There are very few sites available in the town centre to accommodate larger floorplates (the only genuine opportunity is the Provenzano land).

Overall, there is a strong economic argument for including the subject site in the Commercial 1 Zone as part of the implementation of this strategy. This argument holds on the basis of the analysis which informs the strategy itself and is further strengthened by the commentary included in this memo.

Amy Gloury

From: [REDACTED] >
Sent: Friday, 28 November 2025 4:41 PM
To: Moorabool Info
Cc: [REDACTED]
Subject: Submission to Amendment C115
Attachments: 251128 - Calleja Group - Submission to Amendment C115 - Moorabool Retail Strategy Implementation FINAL.pdf

Categories:

Good afternoon.

Please see attached submission to Amendment C115.

Please contact me directly should you have any queries.

Kind regards,

Group Communication Manager



Innovation in Waste Management

 I acknowledge the Traditional owners of the land across Victoria. I pay respect to their Elders, past, present and emerging. This email is private, confidential and intended solely for the addressed recipient(s). If this email has been sent to you in error, please immediately delete and destroy it and/or contact the writer.



MADDINGLEY

BROWN COAL

Landfill & Resource Recovery Operations

28 November 2025

Attn: Manager Growth and Development

Strategic Planning Department

Moorabool Shire Council

PO Box 18, Ballan VIC 3342

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

To Whom it May Concern

RE: Submission to Planning Scheme Amendment C115moor (Moorabool Retail Strategy)

Thank you for the opportunity to provide a submission regarding Moorabool Shire Council's Planning Scheme Amendment C115moor, which implements the *Moorabool Shire Retail Strategy 2024* (the Strategy) into the Moorabool Planning Scheme.

Background

Calleja Group is a Victorian, family-owned and operated business, providing essential waste transport and waste management services. We own and operate the Resources Victoria and EPA-licensed Maddingley Brown Coal (MBC) mine and landfill, and the JBD Industrial Park, at 11 Tilleys Road and 25 Rowsley Station Rd, Maddingley. Across Victoria, we own and operate major waste transfer stations in Coburg and Altona. The company employs more than 250 people across Victoria.

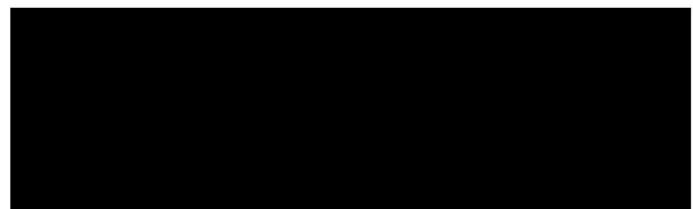
MBC is the largest landfill in the Grampians Central West region, and its ongoing operation is recognised in the Victorian Recycling Infrastructure Plan (VRIP) and the Moorabool Planning Scheme.

Submission

We commend Council's commitment to delivering its long-term vision through an evidence-based Retail Strategy and support its efforts to implement this vision through Amendment C115moor.

Calleja recognises the role orderly strategic planning plays to set clear expectations for the industry and community. While our operations and land uses are non-retail, clear recognition of, and tools to manage land use interfaces and conflicts between retail and industrial land uses is critical for both.

Maddingley Planning Study (Amendment C119)





MADDINGLEY

BROWN COAL

Landfill & Resource Recovery Operations

We note that the Council will consider a report on 17 December 2025, to seek authorisation from the Minister for Planning for the preparation and exhibition of Planning Scheme Amendment C119 for the implementation of the proposed Maddingley Planning Study (MPS).

It is premature to consider the implementation of any proposed retail precincts for Maddingley in Amendment C115 – such as that proposed of Page 25-26 of the Retail Strategy – until the MPS is better understood. As a result, we consider C115 is premature insofar as it relates to land in Maddingley.

Calleja has been consistent in its position that there should be no policy, controls or land uses which encroach into its buffers that cause an impact to the safe, ongoing and unfettered operation of the coal mine, landfill and materials recycling uses that exist on the land and which are supported by State and local policies.

Land use compatibility – consideration of future planning applications

Calleja encourages Council to continue orderly strategic planning for the Shire, to minimise land use conflicts with existing industrial land uses, prevent inappropriate and/or sensitive uses locating within or adjacent to buffer areas, and support the realisation of significant economic benefits.

Future risks to viability of industrial precincts exist in planning applications where inappropriate uses are proposed in the wrong locations. Future planning permit applications – especially those in and around the MBC buffer areas – should thoroughly consider the merits of the proposal in the context of its location and the impact to existing uses.

Consistency in strategic planning outcomes – local and State Government processes

Calleja acknowledges the multiple strategic planning processes underway at local and State Government levels. We encourage Council to continue working with the State Government to ensure alignment in strategic planning outcomes – notably within the Parwan Precinct PSP, to safeguard existing industrial and waste infrastructure and provide certainty for operators like MBC.

Long-term certainty for industrial operators

Calleja Group has invested significantly in Maddingley based on local and State Government policy that supports the protection of industrial land, long-term resource recovery and waste operations, and the safeguarding of essential landfill and recycling infrastructure.

Council must continue to provide certainty and continuity for businesses operating in accordance with approved planning permits, through appropriate planning of adjacent land uses.

Conclusion

Calleja Group commends Council's commitment to its long-term vision for the Shire and supports its efforts in planning for social and economic benefits for community and business needs. We consider





MADDINGLEY

BROWN COAL

Landfill & Resource Recovery Operations

that Amendment C115moor will appropriately set planning and economic guidance for future development, while upholding and advancing important industrial land uses.

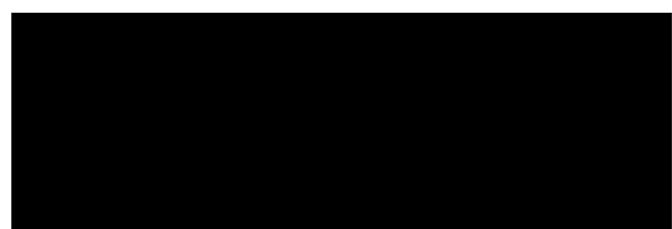
We would be pleased to provide further information or brief Council officers to support this submission. To arrange a meeting or discuss any of the matters raised, please contact me on [REDACTED]
[REDACTED] or at [REDACTED].

Thank you for your consideration of this submission.

Yours sincerely

CEO

Calleja Group



Amy Gloury

From: [REDACTED]
Sent: Saturday, 29 November 2025 10:12 PM
To: Moorabool Info
Cc: [REDACTED]
Subject: Submission Planning Scheme Amendment C115moor
Attachments: C115moor - Kataland Submission 202511.pdf
Categories: [REDACTED]

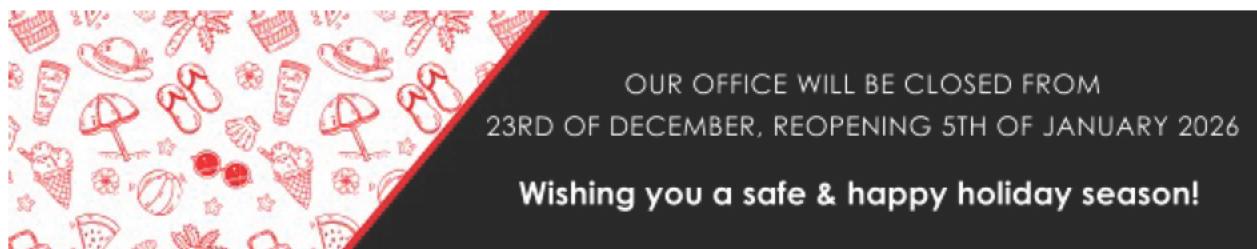
Good evening

Beveridge Williams acts on behalf of Kataland Investments in making the attached submission in relation to Amendment C115moor.

Please contact me if you have any queries.



Senior Town Planner
[REDACTED]
[REDACTED]
[REDACTED]



Proudly certified in Victoria and NSW for Quality ISO 9001, Safety ISO 45001 and Environment ISO 14001



Beveridge Williams acknowledges the Traditional Custodians of the land it works on and pays respect to their Elders, past and present

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Our Reference: [REDACTED]

29 November 2025



Strategic Planning Department
Growth and Development
Moorabool Shire Council
Via email

Dear Planning Department

**RE: EXHIBITION OF MOORABOOL PLANNING SCHEME AMENDMENT C115MOOR
MOORABOOL RETAIL STRATEGY
SUBMISSION ON BEHALF OF KATALAND INVESTMENTS PTY LTD**

Beveridge Williams acts on behalf of Kataland Investments Pty Ltd (the client) in making this submission to Amendment C115Moor.

The Amendment impacts future land use planning associated with the Underbank Estate, with the Underbank Development Plan showing a future local town centre to be provided at the corner of Randwick Avenue and Adelong Way. The delivery of this local town centre is supported by Amendment C115Moor, by implementing the Moorabool Shire Retail Strategy 2024. As such, the client wishes to make a submission in support of Amendment C115Moor.

Underbank Local Town Centre in the Moorabool Shire Retail Strategy 2024

The Retail Strategy nominates the potential Underbank local town centre as falling with the "neighbourhood activity centre or local town centre" category within the hierarchy of retail centres. Centres within this category are to provide a medium sized supermarket, as well as "significant food and grocery provision and a selection of day-to-day good and services". The strategy identifies the typical retail floorspace as between 3,000m² to 7,000m², with the centre to serve a population of between 5,000 and 11,000.

Section 5 of the Retail Strategy discusses the demand for retail centres. Alongside population numbers, Council considers that all residents should be in walking distance of a neighbourhood centre and supermarket. Centres should be "located at highly accessible points", which are serviced by collector roads, public transport, and pedestrian options. Table 5-1 within this section identifies the Underbank local town centre as providing services to a catchment of 4,400 people once the Underbank Estate is fully developed.

Based on the above demand analysis, the Retail Strategy denotes the Underbank Town Centre as having a shop floorspace cap of 2,200m², with an additional 700m² of non-retail floor space to be provided.

Submission to Moorabool Shire Amendment C115Moor

As discussed, the Amendment will implement the Moorabool Shire Retail Strategy 2024. Reference to the Underbank local town centre within the Strategy generally reflects the preferences of the client, and the outcomes proposed by the Underbank Development Plan.



As discussed within the Strategy, the Underbank local town centre will service a population of approximately 4,400 residents once the Underbank Estate is fully developed. This population is less than that identified by the strategy to support a "neighbourhood activity centre or local town centre", however the demand for the proposed local town centre is considered to remain high. Of particular note is the walkability that the local town centre will provide for residents of Underbank. Currently, residents are not provided with services within walking distance. Underbank residents are, to a degree, separated from the broader Bacchus Marsh area by the Korkuperrimul Creek and Werribee River. The current closest shopping precinct is the Bacchus Marsh town centre, which is almost 2.5km from the developing Riverview Precinct of the Estate.

The proposed local town centre will be situated at the corner of Adelong Way and Randwick Avenue; roads which form part of the future public transport route within the Estate. The area is also provided with pedestrian connections via shared and local paths. This location will ensure that all residents within the Estate are provided with a convenient local centre, which will be largely within walking distance for all future residents.

Conclusion

In summary, the client is supportive of the outcomes provided that will be provided for by Amendment C115, including implementation of the Moorabool Shire Retail Strategy 2024. Amendment C115Moor will benefit the growing community within the Underbank Estate, and the broader Moorabool Shire community.

Should you have any queries regarding the above, please contact Beveridge Williams via [REDACTED] or on [REDACTED].

Yours sincerely,

[REDACTED]

[REDACTED]
Senior Town Planner
BEVERIDGE WILLIAMS

Amy Gloury

From: [REDACTED]
Sent: Monday, 1 December 2025 8:54 AM
To: Moorabool Info
Subject: Submission Planning Scheme Amendment C115moor
Attachments: 251128_LO_C115moor submission.pdf

Categories: [REDACTED]



Please find attached our submission in relation to Planning Scheme Amendment C115moor.

[REDACTED]
Principal Planner
[REDACTED]

UrbanDesign
and management

Land Development | Project Management
Planning | Urban Design | Civil Engineering

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As 2025 draws to a close, please be advised that our office will be closed from COB **Friday, 19th December**, reopening on **Monday, 5th January 2026**.

The UDM team thank you for your ongoing support and wish you all a happy and safe festive season.

Project No: 18033
Your Reference: C115moor

28 November 2025

Manager Growth and Development
Moorabool Shire Council
info@moorabool.vic.gov.au

Dear Kate,

Re: Submission Planning Scheme Amendment C115moor

Urban Design and Management acts on behalf of Ballan South Pty Ltd, a major landholder in the Ballan South growth area and proponent of Planning Scheme Amendment C106moor.

We support the intent of the Moorabool Retail Strategy and its implementation through Amendment C115moor. In particular, we welcome the recognition of a future Neighbourhood Activity Centre (NAC) in Ballan South and its inclusion in the updated Activity Centres policy at Clause 11.03-1L.

Ballan South Pty Ltd has been engaged with Council over several years in the preparation of both the Retail Strategy and the broader strategic planning framework for Ballan. We also made an earlier submission during the development of the Retail Strategy, and we acknowledge that a number of our recommendations were incorporated into the exhibited documents. We appreciate this ongoing collaborative process.

Amendment C108moor – Ballan South NAC

Amendment C108moor will propose approximately 2 hectares of land for a NAC, co-located with community and open space facilities, consistent with the Strategy. The amendment will also include a floor area cap within the Commercial 1 Zone, the extent of which is currently being discussed with Council. Preliminary concept work confirms that the NAC can accommodate the retail and non-retail floorspace envisaged in the Moorabool Retail Strategy.

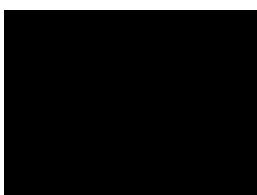
We note that the Strategy, as exhibited, establishes the policy basis for the Ballan South NAC moving forward, and we are supportive of the amendment as framed.

Conclusion

Amendment C115moor is an important step in strengthening Ballan's retail hierarchy and providing a clear strategic direction for future centres across the municipality. We now look forward to Council's acknowledgement of this submission and its consideration as part of the amendment process.

Please do not hesitate to contact us should any clarification or further engagement be of assistance.

Yours sincerely



Principal Planner

Urban Design and Management Pty Ltd