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## ADVERTISED PLAN

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By Online Portal

6 November 2024

Dear Ms McGovan

### **PA2403077 FOR BUILDINGS AND WORKS FOR AN EDUCATION CENTRE (EARLY LEARNING CENTRE) NOTED AS ANCILLARY TO THE EXISTING NUNAWADING CHRISTIAN COLLEGE PRIMARY AND SECONDARY SCHOOL, VEGETATION REMOVAL AND FENCE. AT 161 CENTRAL ROAD NUNAWADING – ADDITIONAL REQUEST FOR FURTHER INFORMATION RESPONSE**

I refer to the above application and a request for additional information dated 22 October 2024.

I provide the following as the response to the request:

- The management of stormwater during construction can be addressed as follows:
  - Erosion and sediment – provision of silt traps as required.
  - Dust – suppression by water.
  - Run off – containment with bunds.
  - Litter, concrete and construction wastes etc. – site to be fenced to stop litter from entering neighbouring properties. Wastes to be disposed to tip or other appropriate measures dependent on waste type.
  - Chemical contamination – if required in accordance with the EPA guidelines.
- I provide a letter from the school addressing the area of former car parking adjoining the existing Early Learning Centre.
- I provide an updated arborist report that is consistent with the ecologist's report.
- The fencing notes on the Development Plans have been amended to refer to a 1.5m high fence.

It is submitted that the amended plans and supporting reports appropriately respond to the areas of concern outlined in the correspondence dated 22 October 2024 and provide additional justification for the proposed development.

I note the additional ESD comments from Whitehorse City Council. These were addressed in the previous response dated 15 October 2024. Accordingly, it is submitted that no additional ESD conditions are required on any permit issued.

The following are comments in relation to the traffic and parking matters raised in the Council comments dated 22 October 2024.

- The proposed Early Learning Centre is required to provide seven (7) parking spaces for the additional 33 students. Clause 52.06 does not require the spaces to be allocated to staff or parents. The proposal provides nine (9) spaces and accordingly complies with the Whitehorse Planning Scheme.
- The existing ELC won't be demolished, just returned to the school and repurposed.

- The ELC drop off and pick up times do not overlap the school drop off and pick up times as discussed.
- It's not accurate to include the ELC traffic flows within the school traffic flows.
- We cannot reduce the number of places to 90 as our state funding requires us to supply 3 full rooms of 33 per room.
- The assessment of Application WH/2022/168 (Year 3-6 Building) indicated that there were 137 parking spaces onsite. These potentially included 7 spaces adjoining the existing ELC building, which are not used for car parking as confirmed by the school. Council indicated that there was a shortfall of 36 spaces. It was noted that there would be a shortfall of 41 spaces accounting for the increase in student numbers for the Year 3-6 building. The provision of the 9 spaces required for the current application will provide 139 spaces onsite and a shortfall of 39 spaces. The Council report on application WH/2022/168 indicated on page 9 of 15 as follows:  
*"However, as the use of the site as an education centre is operative for more than 15 years, the use is considered to be established and the application in question is only considering buildings and works (and vegetation removal), a cap on student numbers cannot be placed to commensurate with the parking availability. On this basis, it is considered that the proposal is consistent with the requirements of Clause 52.06."*  
It is submitted that the same outcome applies to the current application and the car parking requirements of Clause 52.06 are satisfied.

I believe that responds to the information request and Council comments.

I note that under Clause 53.19 of the Whitehorse Planning Scheme that the development of land for an education centre that is ancillary to and carried out in conjunction with and on the same land as a primary or secondary school is exempt from the notice and review provisions of the Planning and Environment Act. Accordingly, I ask that the application be determined and a permit with endorsed plans issued at your earliest convenience.

If you require additional clarification, please do not hesitate to contact me on 0407 878 316.

Yours sincerely  
For and on behalf of  
Currie & Brown (Australia) Pty Ltd



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**Manager Planning Services**

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