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13 July 2026

Taylor Alley
Planner – Development Assessment
Department of Transport and Planning

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Dear Taylor,

Referral Response – S72 Amendment PA2403350-1 Trinity Grammar School Marles Playing Fields – Sports Pavilion – 162-168 Bulleen Road, Bulleen

1 Introduction

Urbis continues to act on behalf of the permit applicant, Trinity Grammar School, Kew, in relation to the S72 amendment application PA2403350-1 at 162-168 Bulleen Road, Bulleen.

We write in response to the referral comments from Manningham City Council (dated 11 June 2026), VIDA Roads (dated 1 June 2026) and Melbourne Water (15 June 2026).

In support of this submission, please find enclosed:

- Landscape Architectural Package Masterplan prepared by Site Image Landscape Architects, (most updated drawing LT302), dated 30 June 2026
- Town Planning Drawings, prepared by McIldowie Partners, dated 7 July 2026

2 Referral Response

2.1 Manningham City Council

The table below provides a response to each of Council's referral comments.

Table 1 – Manningham Response

ITEM		Response and Document Reference
Signage and lighting		
1.	The proposal includes electronic advertising signage (Digital Wayfinding Signage Blade) which	The updated TP drawings show that the display area of the electronic part of the advertising signage is approximately 1.84 square metres. This is permissible

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appears to be prohibited in this Category 3 area of Clause 52.05 if it exceeds the display area allowance of 3 sqm. Signage would need to be dimensioned and demonstrate the electronic display area is less than 3sqm.

as it as a digital wayfinding sign as it is less than 3 sqm.

See attached Town Planning drawings (drawing number SK004) with signage dimensions outlined.

2. **Conditions should require all lighting including the pavilion and internal illuminated signage, tennis court lighting, and sports oval lighting limited by lighting timers to cease operation between 10pm and 7am as a minimum; all light poles be baffled to minimise light spill to adjoining residential and detailed on plans including providing elevations of light poles to Daley Oval (not submitted); all signage be fully dimensioned (not all submitted).**

A standard condition stating that lighting be baffled is not considered reasonable. Given the distance of the lights from residential properties, with the exception of the tennis courts it is not considered that additional conditions are needed.

However, it is not proposed to have lights on after 10pm each day and therefore a condition restricting the tennis court lights which are closest to residential properties to 10pm is reasonable.

This is consistent with condition 7 in the Marcellin College sports field lights permit granted by Council (PLN23/0397) which states that *'except with the written consent of the Responsible Authority, the approved outdoor lighting must be switched off no later than 10pm every day to the satisfaction of the Responsible Authority'*.

We suggest 10pm is reasonable because it will allow the school to manage hour restrictions across the site consistently.

In regard to signage, the signs face internally to the site, are low scale and are located a significant distance away from residential interfaces, therefore a time limit is not considered necessary.

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3. **The report notes there are the intentions to baffle and limit hours but no details were provided.**

The lighting proposed meets the applicable standards. The Town Planning drawings submitted notes the proposed lighting associated with the signage. A note on each drawing provides *'signage to comply with Category B of DTP's signage light criteria – less than 2sqm illuminated area on each sign, with a maximum daytime luminance of 4000 cd/sqm and maximum night-time luminance of 200 cd/sqm'*.

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Refer to discussion above regarding hours and standard baffling conditions for lighting poles.

Vegetation

4. **To facilitate the proposed car park extension, 29 trees are proposed to be removed, for which nearly all are moderate value or high value specimens, native and indigenous. These trees are situated along the edges of the existing car park and provide a significant contribution to the environmental and landscape value of the area. The loss would be significant and a poor response to the environmental and landscape objectives of ESO3, which encourages development within areas that are the most degraded and devoid of native vegetation.**
- The ecological assessment undertaken on 18 March 2026, notes that the majority of vegetation to be removed is classed as 'Non-Native'. Furthermore, this report also provided quantification of native vegetation losses.
- In terms of avoiding and minimising when assessing vegetation removal under the ESO3 overlay, the report outlines that the carpark has been designed in a manner that minimises impacts to the broader patch of River Red-Gum and the associated understory vegetation.
- Tree removal has been centred on impacts to trees that were originally planted for amenity, rather than habitat values. Some River Red-gums adjacent to the carpark have also been protected by ensuring that construction does not impact on tree protection zones.
- The project avoids impacts to remnant native plants within the wetland and its immediate edge. Mitigation measures will be put in place to prevent sedimentation and other threats to this vegetation.
5. **On the northern end of the car park the proposal seeks to retain a medium value Tree 104.**
- However, the proposed development will result in a major encroachment into its NRZ, beyond what was considered as part of the Arborist report from additional hard surfaces (paths) within the trees structural root zone (SRZ). As such, Tree 104 is unlikely to remain viable and should also be considered lost, unless a redesign occurs.**
- The design is within the parameters and requirements of AS4970-2025 to ensure consideration in retaining existing Tree 104. The design has considered the existing condition of the landscape surrounding Tree 104 and proposes a series of improvements to provide better growth conditions and assist in its retention, within the limitations of the site, and requirements for accessible and compliant pathways. This includes key design interventions such as:
- No encroachment with the SRZ and removal of existing hard pavement within this area.

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It is noteworthy that of the few retained, half are low value specimens which is contrary to the preferred outcome.

Council does not support the loss of the moderate or high value vegetation to facilitate the car park. The proposal should be redesigned accordingly to clearly avoid or minimise the loss of significant vegetation, at least the high value trees as a minimum, or sited elsewhere in an area devoid of native vegetation.

The proposed landscape plan appears to propose the planting of only 3 canopy trees, an *Acacia implexa*, *Acacia melanoxylon* and *Eucalyptus camaldulensis* and with such planting already in areas that are vegetated. Therefore, the application fails to appropriately offset the significant loss of vegetation proposed.

- Provision of mulched surface and supportive understorey planting to protect the root zone, so that the area is not accessible to foot traffic.
- Provision of new hard stand pavement within a reasonable extent and level to that which was previously existing.

It is considered that the low value specimens referred to by Council, are simply just younger trees and will in fact become substantial over time.

The loss of vegetation referred to considers existing non-native and non-Indigenous trees in open grass, adjacent to an eroded and poorly vegetated ephemeral zone (constructed wetland), with little active ecological or habitat value. By contrast, this planting design proposal aims to improve a substantial extent of understorey vegetation as critical habitat in accordance with the following objectives defined by the Ecological Assessment:

- Improve habitat quality and connectivity, including for Growling Grass Frog
- Enhance vegetation structure across Floodplain Riparian Woodland (EVC 56) and Wet Verge Sedgeland (EVC 932).
- Stabilise soils and reduce erosion, particularly along regraded banks.
- Improve water quality through vegetated buffers and filtration of runoff.
- Contribute to canopy cover and foraging resources for native fauna.

Furthermore, regarding trees 290 and 299:

- Tree 290 was identified as dead as per arborist reports and was previously removed following it falling over in a storm
- Tree 299 was removed in 2022, as per arborist report and reflected in the updated landscaping plans. As per email correspondence, we understand that the current proposal is acceptable to DTP.

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The landscape proposal is for an alternative revegetation scheme that prioritises the value of understorey and ground dwelling-based habitats (in addition to remaining the dominant canopy habitat across the broader site). The planting design is in accordance with the recommendations of the report, which are intended to improve habitat and ecological values within the study site, including the planting of understorey species within native vegetation.

It is important to recognise how the re-vegetation scheme supports the advancement of existing River Red-gum saplings, which will flourish with the removed competition of nearby non-native, non-Indigenous tree species.

6. **An additional 2 Victorian Native trees (Tree 280 and Tree 316) are proposed to be removed along the southern boundary to facilitate storage sheds. Council does not support the loss of these trees given ample space void of canopy trees is available within the site to construct the storage sheds without resulting in the loss of vegetation.**

There are previous approval for these trees as per the below and email correspondence on 26 June 2026 we understand this satisfies this issue.

- Tree 280: Previously approved for removal by Manningham (unsafe) and removed by Trinity Grammar School, Kew under Planning Permit PLN25/0442.
- Tree 316: Previously approved for removal by Manningham (unsafe) and removed by Trinity Grammar School, Kew under Planning Permit PLN25/0042.

2.2 VIDA Roads

The table below provides a response to each of VIDA Road's referral comments.

Table 2 – VIDA Roads Response

ITEM	Response and Document Reference
Updated Construction Management Plan NELP respectfully request that DTP incorporate the following matters into any decision made for the amended development.	Noted – We understand these conditions will be included on the permit.

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Before the amended development starts, an updated Construction Management Plan (CMP) must be prepared pursuant to Condition 18 of Planning Permit PA2403350.

The updated CMP must address the amended development and include:

1. Details of the proposed timing and duration of the works, including any contingency delivery dates.
2. Confirmation of whether works are proposed to occur during day or night shifts. Where works are to be undertaken by United Energy, the proposed working hours should have regard to United Energy's operational requirements, including any preference for day shift works.
3. Confirmation of whether any supporting works are required, including power outages.
4. Where power outages are anticipated, confirmation from United Energy of any such requirements, including the timing, duration and location of outages or related works.
5. Confirmation of the dimensions of the vehicles (including float/trailer configurations) proposed to transport the light poles to the site.
6. Details of the proposed delivery route, including the direction of travel to and from the site.
7. An assessment of the suitability of the current temporary access arrangement from Bulleen Road for the proposed vehicle

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- movements, including consideration of:
- a. northbound access via right-turn movements; and
 - b. southbound access via left-in movements having regard to the length and manoeuvring requirements of vehicles transporting light poles.
8. A swept path analysis based on the current temporary Bulleen Road access arrangement, demonstrating that vehicle movements associated with the delivery of light poles can be accommodated for safe ingress and egress without impacting NELP works.

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2.3 Melbourne Water

The table below provides a response to each of Melbourne Water referral comments.

Table 3 – Melbourne Water Response

ITEM	Response and Document Reference
Melbourne Water does not object to the amendment to planning permit (PA2403350), subject to following 'additional' conditions: (Current conditions of permit to be maintained) Conditions to be added:	
1. Prior to endorsement of plans, a separate 'Build Over application' must be submitted for Melbourne Water's review and approval for demolition of existing structures, or tree removal and any other proposed works within 5.0 metres of Melbourne Water's asset.	The project manager has noted that this has already occurred and noted that <i>Build over application MWA-1405600 – New case Number 259160 was withdrawn and the application fee refunded by Melbourne Water on 30 April 2026.</i> Therefore, this condition has already been satisfied.
2. All electrical and plumbing installations (Eg. light poles, toilets etc) within the flood prone property must be designed	The suggested standard permit condition wording is accepted in principle.

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	and constructed to comply with requirements of the relevant authorities.	
3.	Flood Risk Management Report (FRMP) prepared by HARC, dated: February 2024 must be updated to include amendments to the proposal/ additional works. Updated FRMP must be submitted to Melbourne Water for assessment and approval.	The suggested standard permit condition wording is accepted in principle. The FRMP will be updated as required and submitted to Melbourne Water for assessment and approval.
4.	Landscaping/ earthworks – Landscaping within 5.0 metres of the asset must comply with Melbourne Water's Planting Guidelines.	Noted. Landscaping is intended to comply with the relevant guidelines.
5.	New or modified stormwater connection must be made to Council's drainage system.	The suggested standard permit condition wording is accepted in principle. Approvals will be made to the relevant authority as required.
6.	Utility Installation – No services are to be installed across Melbourne Water's Asset or within the easement unless approved by Melbourne Water.	The suggested standard permit condition wording is accepted in principle. No utility installations are planned across a Melbourne Water asset or within the easement. Build over application MWA-1405600 – New Case Number S-259160 was withdrawn and the application fee refunded by Melbourne Water on 30 April 2026.
7.	Vibration – Works to be carried out surrounding the sewer must be undertaken in a manner that protects the sewer. (i.e. minimum vibration, loading, caution with construction vehicles traversing over the sewer which is located relatively shallow under ground)	The suggested standard permit condition wording is accepted in principle.

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3 Conclusion

We trust this information is sufficient to assist you with your continued assessment of this application.

If you have any questions or require any additional information, please do not hesitate to contact Jacob McGarry or me on the below details.

Kind regards,

Lauren Murrant

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