

19 June 2026

Taylor Alley
Department of Transport and Planning
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Dear Taylor,

PA2604229 – 155 Staughton Vale Road, Staughton Vale – RFI and Objection Response

1 Introduction

Urbis continues to act on behalf of the permit applicant, Bacchus Marsh Grammar, in relation to planning permit application PA2604229 at 155 Staughton Vale Road, Staughton Vale.

We write in response to DTP's Request for Further Information (RFI) including preliminary comments, dated 16 March 2026. Also enclosed is our response to City of Greater Geelong's objection, dated 19 March 2026.

In support of this submission, please find enclosed:

- Architectural Plans, Rev 8 prepared by GoDesign, dated 3 June 2026
- Landscape Concept Report, Rev C prepared by Urbis, dated 11 June 2026
- Sustainability Management Plan, Rev 2 prepared by EcoResults, dated 5 May 2026
- Biodiversity Assessment Report, Version 1.2 prepared by Abzeco, dated 2 June 2026
- Addendum A to Agricultural and Sustainable Land Management Plan, prepared by Abzeco, dated 2 June 2026
- Traffic Impact Assessment, prepared by Traffix Group, dated 1 June 2026
- Aboriginal Cultural Heritage Letter of Advice, prepared by Urbis, and dated 24 April 2026
- Bushfire Emergency Management Plan, prepared by Terramatrix, dated 25 May 2026
- Planning Report, Rev 2 prepared by Urbis, dated 28 May 2026
- Additional Visual Impact Photomontage, prepared by Urbis, showing vegetation screening at 10 years' growth.

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2 RFI Response

The table below provides a response to each of DTP's RFI items.

Table 1 – RFI Response

RFI ITEM	Response and Document Reference
1. Architectural plans amended to show: a) Roof plan, including solar photovoltaic arrangement and capacity b) Operable windows on elevations and incorporation of operable windows along ground floor c) Location and height of proposed retaining walls d) Proposed signage as section drawing e) Details of service utilities (such as fire boosters, meters and substation) including their location, dimensions and design. f) Annotation showing location of bus drop off area g) Location of waste storage area.	a. A roof plan including indicative locations for a rooftop solar system are included at TP07.1. b. Elevations at TP08 are updated to show operable windows (denoted by 'v' shaped symbol on windows). c. As shown at TP05, the retaining walls have been removed and replaced with landscaped batter (1:3 gradient). This will achieve an improved visual and practical outcome for this section of the site. The Landscape Concept Plan has been updated to reflect this change, including increased planting within the northern section of the batter area. d. An inset plan detailing proposed signage is included at TP08, which also confirms the signage will not be illuminated. e. Locations of services are included in the updated plans. This includes the existing electrical kiosk and main switchboard (TP05), proposed locations of fire hydrants (TP07) and proposed locations of fire tanks and booster assembly (TP05). f. The bus drop off area has been included at TP05. g. TP07 is updated to show the former 'Store/Resource' room as 'Waste Storage/Resource', to clarify waste to be stored in this room.

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3 Response to DTP's Comments

The table below provides a response to DTP's comments, included in the abovementioned RFI following a preliminary assessment of the application.

Table 2 – Response to preliminary comments

COMMENT	Response and Document Reference
1. Proposed hours of operation are not stated in the submitted planning report. Please provide detail of hours of operation and subsequent justification to those hours.	The site is proposed to generally operate between 7:00am and 6:00pm on weekdays, consistent with normal school activities and staff use. It is requested that flexibility be allowed for in relation to hours of operation within any future permit conditions, so that the school may use the site outside of the above normal school hours on occasion.
2. It is unclear whether the proposed car park and bus drop off area are to be sealed, all-weather roads. It would be required at a minimum that these areas be sealed unless otherwise justified.	As shown in the attached updated Architectural Plans (TP05), the car park and bus drop off areas are proposed to be sealed.
3. Within the City of Greater Geelong Council (the council) pre-application advice letter dated 19 May 2025, historic concerns regarding light spill from the existing school operations have been raised, and for this application to address light mitigation measures. The planning report should be amended to include detail on how the proposal will manage and mitigate light and sound impacts.	Bacchus Marsh Grammar has advised that there was a complaint in September 2023 from 85 Staughton Vale Road in relation to lighting on the site. In response, the school adjusted the direction of external lighting and implemented timer controls to limit operation between 7:00am and 8:00pm shortly thereafter. There have been no further complaints since those changes were made. In addition, Bacchus Marsh Grammar now owns 85 Staughton Vale Road which further reduces the likelihood of future lighting conflict from that direction. The school currently manages lighting through the use of timers and baffles, ensuring that lights turn off after a set time (generally operating between 7:00am and 8:00pm). External lighting is designed to avoid spill toward neighbouring properties.

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	Outside normal operating hours lighting is limited to minimal security and safety lighting only designed to avoid spill to adjoining properties. See Section 4.9 of the amended Planning Report for further details of management of lighting and noise impacts on the site.
4.	Provide clarification regarding the functions of the proposed 15,000L in ground rainwater tank and Barwon Water Tapping identified on the plans. ADVERTISED PLAN
	As detailed in the Sustainability Management Plan prepared by EcoResults, the proposed 15,000L rainwater tank will be connected to toilets and urinals for flushing. The Barwon Water Tapping identified on the Architectural Plans is currently used for reticulated water supply, which is proposed to be connected to the new building.

4 Objection Response

The table below provides a response to City of Greater Geelong's objection. Items 8 onwards are general comments included within the first two pages of the objection letter.

Table 3 – Response to City of Greater Geelong's objection

COMMENT	Response and Document Reference
1. Evidence has not been supplied confirming whether or not a Cultural Heritage Management Plan was required for this proposal.	As detailed in the attached Aboriginal Cultural Heritage Letter of Advice, the subject site is impacted by a mapped area of cultural heritage sensitivity, located within a northern section of the site. However, the proposed activity under the permit application does not impact the area of cultural heritage sensitivity and therefore a Cultural Heritage Management Plan is not triggered by the proposed works.
2. Swept path diagram showing waste truck access and collection from waste storage area must be provided.	These swept paths have been provided at Appendix B of the updated Traffic Impact Assessment prepared by Traffix Group. The swept paths detail appropriate access and circulation for the relevant vehicles.
3. The Biodiversity Assessment supplied alongside the planning application	a. Figure 2 within the attached Biodiversity Assessment Report shows the approximate extent of

notes that there is native vegetation present on the subject site, and that no native vegetation or fauna habitat will be impacted by the proposal. However, the Assessment does not appear to demonstrate anywhere on the plans the location of the aforementioned native vegetation. Please include a site plan showing the following:

- a. The location of all the native vegetation that was identified in the assessment.
- b. The proposal, including a construction buffer and demonstration of any areas required for service connections.

native vegetation on the site. Also shown are the approximate extents of revegetation zones, reflecting planting undertaken by Bacchus Marsh Grammar.

- b. A construction buffer and areas of required for service connections are shown in the attached Architectural Plans (TP05.1).

4.

Further information regarding the potential nuisance impact from lighting and noise, including but not limited to:

- a. The hours that the site will be used (including without student attendance).
- b. Management of noise from students during daytime (7am-10pm) and night (10pm-7am) hours respectively.
- c. Management of noise from bells and announcements.
- d. Management of lighting for property during night hours (10pm-7am).

a. The site will generally operate between 7:00am and 6:00pm, consistent with normal school activities and staff use.

b. Student activity is limited to standard daytime school hours and is managed under staff supervision. Outdoor activities are scheduled and monitored to minimise unreasonable noise impacts on adjoining properties. There are no amplified outdoor activities, sporting events or external PA uses during night hours (10:00pm-7:00am).

c. School bells and PA announcements are limited to daytime operational hours only and are used in a manner typical of standard educational facilities. These are kept at reasonable volumes appropriate to the campus setting and are not used during night hours.

d. External lighting is designed to avoid spill toward neighbouring properties and is controlled via timers generally operating between 7:00am and 8:00pm.

Outside normal operating hours, lighting is limited to minimal security and safety lighting only. This is designed to avoid spill to adjoining properties.

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5.

As the site is entirely dependent on private vehicle travel for staff, any

As detailed at Section 4.7 of the Planning Report and Section 4 of the Traffic Impact Assessment (TIA), the

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reduction of the required car parking will not be supported, and it is recommended that formal car parking spaces are provided on-site to meet the minimum statutory rate. The applicant must demonstrate the 15 Formal Car Spaces for the Secondary School and clearly show the provision of an additional 25 Informal Overflow Car Spaces for days when attendance of staff and students is at its peak.

required car parking spaces for the proposed primary school use is 25 spaces, however a dispensation for a reduction of 6 car parking spaces for normal operating days is sought in relation to the ongoing secondary school use.

The secondary school use will continue current car parking arrangements which rely on access to the site for staff and students via school bus from the main campus. As the students for the secondary school activity are day-trip visitors, they must be accompanied by teachers from their school to and from Staughton Vale, resulting in a negligible staff car parking demand. Secondary school staff are based at either the Maddingley or Woodlea campus and accompany the students to and from the site on buses from those campuses.

Section 4.2.1 of the TIA details that car parking demands associated with the ongoing secondary school use are currently accommodated within the existing 9 car parking spaces on the site, which will continue to be made available to the secondary school use. These car parking spaces are typically used by the coordinator and maintenance staff only (two vehicles), with some additional staff members occasionally driving directly to the site.

The TIA also details that any overflow car parking can be accommodated within the eight parallel overflow spaces adjacent to the proposed primary school building, and that the area close by the secondary school buildings is generally flat which may also provide overflow car parking (in the unlikely event that this is needed).

Furthermore, the updated TIA includes further details at Section 4.6 on traffic generation according to student/staff scenario (i.e. ordinary scenario and 'special event day' scenario), to allow for a more nuanced understanding of traffic generation on the site.

6. Unsatisfactory evidence has been submitted to demonstrate that the

See updated Architectural Plans and swept path diagrams included within the Traffic Impact Assessment, which include passing bays to ensure

entire site can accommodate two-way vehicle traffic

two-way vehicle traffic can be accommodated within the driveway.

As shown within the swept path diagrams at Appendix B, the passing bays will allow for a 14.5m bus to pass a standard passenger car.

7.

The following clarifications must be made on the plans to accommodate ESD commitments:

a. Raingarden(s) with a surface area of at least 16 square meters treating runoff from the carpark. A cross-section of the proposed raingarden build-up is to be provided.

b. The target Water Efficiency Labelling and Standards (WELS) ratings for showerheads, kitchen taps, bathroom taps, toilets and urinals.

c. A rooftop solar photovoltaic system with a capacity of at least 10 kilowatts.

d. Clearly note which windows will be operable on the elevations and provide a ventilation diagram demonstrating at least 60% of regularly occupied areas achieve natural ventilation in accordance with the Built Environment Sustainability Scorecard criteria.

e. The maximum internal illumination power density in at least 90% of floor areas will be at least 20% lower than required by Table J7D3a of the National.

f. Mechanical ventilation is to be designed to be capable of providing an 50% increase in outdoor air availability above Australian Standard 1668.2:2012.

a. A raingarden with a minimum area of 16m² is included at page 14 of the updated Sustainability Management Plan (SMP), which will be used to collect runoff from the hardstand area.

The indicative raingarden location is shown in the updated Landscape Concept Report. It is anticipated that further details of the raingarden be provided within future detailed landscape plans.

b. The target WELS ratings as provided in the SMP are included at TP07 of the updated Architectural Plans.

c. A roof plan including indicative locations for a rooftop solar system are included at TP07.1.

d. Elevations at TP08 of the Architectural Plans are updated to show operable windows (denoted by 'v' shaped symbol on windows). TP07 specifies natural ventilation within the proposed building, which is greater than the natural ventilation required within all relevant rooms.

e. This is met within the Sustainability Management Plan and referenced at TP07 of the Architectural Plans.

f. Mechanical ventilation will be capable of providing a 70% increase in outdoor air availability above AS1668.2:2012, as detailed in the Sustainability Management Plan and at TP07 of the Architectural Plans.

8.

It is considered that the purpose of the Farming Zone does not support the intensification of this use, nor does the applicable planning policy. Namely,

As detailed in the attached Addendum A: Past, Current, and Future Land Use to the previously submitted Agricultural and Sustainable Land Management Plan prepared by Abzeco, the proposal

Clause 14.01-1L-01 states the following objectives:

- To preserve the productive agricultural capacity of the land and where possible enhance the environmental condition of the land.
- To maintain the landscape character of the rural areas.

It is considered that the intensification of this land use and the accompanying buildings and works will be in direct contradiction of the above-mentioned strategies. The proposal will further reduce the ability of the land to be returned to productive agricultural land and significantly impact on the visual amenity of the surrounding locality.

The proposal is not supported by the strategies listed within this policy, given it will not aid the adjoining rural land uses, and the scale of the proposal does not complement nor respect the established rural landscape character.

does not materially impact the productive agricultural capacity of the site.

Prior to the current use of the site by Bacchus Marsh Grammar, the site was not intensively used for agricultural purposes, with agricultural production generally limited to a mixed fruit orchard in a southwest section of the site, cereal cropping within selected paddocks and limited sheep/cattle grazing.

Agricultural production on the site currently consists of hay production within northeast paddocks, orchards within a southwest section of the site, small-scale market garden activities and agricultural and environmental education programs associate with the school. Other areas of the site are currently maintained as conservation areas, noting these areas are generally unsuitable for agriculture due to physical constraints such as slope and topography.

The current arrangement will continue under the proposed use and development of the school. The proposed building and works cover a limited section of the site, calculated at Table 1 of the Addendum A document as an increase of approximate 2.1 hectares allocated to school zone use. While this section of the site is available to be used for agricultural production is not currently used for this purpose. The site will also continue to be used for agriculture education, with the limited use of the site for agriculture adjacent activities to continue as under current arrangements. Remaining sections of the site will continue to be designated for conservation and education uses, as detailed at Figure 1 of the Addendum A document prepared by Abzeco.

Further details are given at Sections 3 and 4 of the Addendum A document, including in relation to the proposed changes to agricultural productivity on site and agricultural land proposed to be retained.

It is further noted that Clause 14.01-1L-01 (Discretionary uses in rural areas) also includes the strategy to support discretionary uses, where the intensity of the use will complement adjoining rural land uses, existing agricultural activity on adjoining land will not

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be compromised and the scale of the development will complement and respect the rural landscape character. The intensity of the use of the site will continue to be low, in keeping with adjoining rural properties. As detailed in the Visual Impact Assessment prepared by Urbis, the proposed development is consistent with the surrounding rural landscape and character. It is therefore considered that the proposal is consistent with Clause 14.01-1L-01.

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| 9. | <p>A reduction in the required car parking is not supported for this site. The staff will all be reliant on travel by private vehicle, given the distance from any viable public transport. All car parking as required by Clause 52.06-5 must be supplied. It is also considered unsatisfactory that the private accessway and overflow 'formal' car parking is unsealed, given it is a standard expectation of rural development that use is serviced by an all-weather sealed access.</p> | <p>As detailed above within our response to item 4 in DTP's RFI, the reduction in car parking spaces is only proposed in relation to the ongoing secondary school use. The existing car parking arrangements are proposed to continue, which can accommodate car parking demand on site.</p> <p>As shown in the Architectural Plans, the proposed car park and bus drop off area will be sealed.</p> |
| 10. | <p>The proposal is also considered to not be conducive to the requirements of the Significant Landscape Overlay – Schedule 5, as it does not sufficiently mitigate the visual impacts arising from the increased built form, bulk, and massing. Whilst it is acknowledged that the subject site itself is of a lower 'sensitivity' regarding the available views, there are concerns surrounding the sheer scale of the proposed built form (being over 2000sqm). It is not agreed that the building will 'settle' into the agricultural context, given that this particular locality does not have examples of buildings of such a scale, and the proposed buildings are already a departure from established agricultural designs.</p> | <p>As detailed within the Visual Impact Assessment prepared by Urbis and Section 4.3 of the planning report, visual impacts of the proposed building are considered appropriate with regard to existing views of the site from surrounding land. This ensures that the protection of the landscape is achieved in accordance with the decision guidelines of the SLO5, including through appropriate siting, scale, materials and form of the proposed building.</p> <p>The scale of the building is modest and considering the large setback to Staughton Vale Road (approximately 201 metres) and limited visibility from surrounding land, is considered appropriate to the site.</p> <p>The updated landscaping plan includes a screening tree break to the south east of mixed Eucalyptus and Acacia. Noting that the Visual Impact Assessment already established that the development had the lowest possible visual impact within the methodology,</p> |

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the Urbis Visual Impact Assessment team have provided one additional visualisation showing the proposed landscaping established after 10 years growth (see below, and attached). The tree break almost completely screens the proposed building such that the visual impact would be negligible.



11.

The choice of material must draw upon the surrounds, with grey colorbond roofing and cladding being an inappropriate response to the highly vegetated setting. Whilst it can be ascertained that the intention of this was to provide a 'neutral' backdrop, it is unclear how they have drawn upon the existing context and provided a bespoke design acknowledging the values of the site. Further to this, it is considered that the single line of tree planting would not sufficiently screen the large building from view, and additional planting should be seriously considered in response to the relevant planning controls and the context the building exists within. Reconfiguration of the built form into at least two separate buildings may also aid in addressing the above concerns.

An analysis of existing buildings on site and within neighbouring properties demonstrates that the external materials of the proposed building are consistent with existing conditions. This includes the proposed brick veneer with grey pail and surfmist colours on the upper sections of façades, which are consistent with the existing school building and buildings on neighbouring properties.

The proposed vegetation along the southern site boundary to Staughton Vale Road will sufficiently screen the site from surrounding land, improving on the already limited visibility of the building identified within the Visual Impact Assessment.

The scale and bulk of the proposed building are modest and appropriate to the location within the site. Reconfiguring the built form into two separate buildings would represent an inefficient use of land and is unnecessary in order to comply with provisions of the planning scheme and deliver a high quality built form outcome on the site for the school and community. Additionally providing two separate buildings doesn't work for the school in terms of operational requirements.

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5 Response to CFA Referral

The table below provides a response to CFA's request for information. As requested by the CFA a separate cover letter is provided for submission to the CFA.

RFI ITEM	Response and Document Reference
1 Integrated Response to Emergency Management CFA understand that the proposed building and works seeks will see an intensification of use of the site with 300 extra people present and that the Bushfire Emergency Management Plan (BEMP) prepared by Terramatrix of the 2021 application is proposed to be used with updated AFDRS action triggers.	This statement is correct in terms of intensification of use of the site. An updated BEMP is provided which is intended to supersede the 2021 BEMP by Terramatrix.
2 CFA request the proposed BEMP to assess how the intensification of use impacts the practical implementation of the BEMP and proposed actions using the AFDRS system.	The attached Bushfire Emergency Management Plan (BEMP) addresses bushfire risk associated with the increased student and staff numbers on the site, including a plan for responding in the event of a bushfire emergency. Section 3 of the BEMP details actions and responsibilities according to fire danger rating. This includes a response to a forecast High or Extreme fire danger rating, in addition to days of Extreme or Catastrophic fire danger rating when the site will be closed.

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6 Conclusion

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

Should any of the requested information not be satisfied or remain outstanding, we respectfully request a one (1) month extension on behalf of the permit applicant to provide the requested information under Section 54A of the *Planning and Environment Act 1987*.

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

Kind regards,

A handwritten signature in blue ink, appearing to read "D. Cooper".

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