

ADVERTISED PLAN

12652

1 October 2025

**Statutory Planning Department
Department of Transport and Planning
Attention: Julia Smith, Senior Planner Development Approvals & Design
Via: Portal**

Dear Julia,

**Re - Request to amend Planning Application – Section 72 of the Act
19-23 Horswood Road, NARRE WARREN NORTH
Planning Permit: PA2302660**

KLM Spatial continues to act on behalf of the applicant, *Pared Victoria Ltd*, in regard to the above planning permit amendment application.

Our client has undertaken a further review of the permit and we seek to amend the following:

- Seek changes to conditions 36 and 37 to align with school operational requirements.
- Seek written consent under condition 38 to enroll 239 students in stage 1B subject to conditions of transport.
- Minor changes to the plans to align student numbers with the permit conditions.
- Updated Traffic and Car Parking Management Plan to outline new arrangements for increased student numbers.

The changes sought are required to allow the increase of students in Stage 1 and update conditions to reflect the operational requirements of the school.

Plan and Documentation Amendments

- The Traffic and Parking Management Plan has been updated to reflect the updated numbers and staging.
- A minor change to the staging plan is required to adjust the staging student numbers. Student numbers increase in Stage 1A to 189 and Stage 1B to 239 as shown below. This is to allow more students to attend the site to relieve the pressure on Harkaway Hills.

Stage 1A		Stage 1B		Stage 2	
Endorsed	Proposed	Endorsed	Proposed	Endorsed	Proposed
153	189	153	239	239	239

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Condition Amendments

School Use and Operation

Condition 36 – amend

Currently reads:

The school, including any ancillary sporting events, must not operate on weekends and public holidays.

Proposed to read:

The school, including any ancillary sporting events, must only operate from 7am to 8pm on weekends and public holidays.

Justification

This condition is considered to be unreasonable noting that a critical part of the school curriculum is sporting events that are held on weekends for students. These include but are not limited to; netball, soccer, AFL, basketball, hockey etc. In addition, there will be instances where there is an Open Day for the school on the weekend, professional development, teachers are required to work on Saturday or School productions that have rehearsals, etc. We note that the hours proposed are extended to allow for appropriate set up and pack up of equipment as required to meet the operational requirements of the school. It is impractical for the school to seek permission for each time they have a weekend school event noting that there is sometimes minimal to no lead time for organising these events or there may be a need to attend the school on weekends.

Condition 37 – amend

Currently reads:

School related events, including sporting events, must not occur before 8am or after 6pm on weekdays, unless with the written consent of the Responsible Authority.

Proposed to read:

School related events, including sporting events, must not occur before 8am or after 9pm on weekdays, unless with the written consent of the Responsible Authority.

Justification

A 6pm finish time for weekday events or meetings is not practical for the school. There will be many after hours events that run past 6pm, this is including but not limited to; parent-teacher interviews, school productions, teacher grading and overtime as required and school sports training. A finish time of 9pm will allow for the meetings/events to take place and pack up to be undertaken as required prior to 9pm.

Condition 38 – amend

Currently reads:

No more than 153 students are permitted to be enrolled at the school in Stage 1 and no more than 239 students are permitted to be enrolled at the school in Stage 2 (final stage), without the written consent of the responsible authority.

Proposed to read:

No more than 189 students are permitted to be enrolled at the school within Stage 1A (with school bus transport only), 239 in Stage 1B (with school bus transport only) and no more than 239 students

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are permitted to be enrolled at the school in Stage 2 (final stage with parent drop off allowable when intersection is completed), without the written consent of the responsible authority.

Justification

The original number of 153 students in Stage 1 was an estimate and therefore, an unknown number at the time of the initial application. Student numbers are required to be increased to allow the campus to assist Harkaway Hills as well as anticipate the likely enrolment of students in 2026. This condition was imposed due to the requirement for the intersection upgrade prior to the increase in student numbers, and allowable parent pick up and drop off for Stage 2.

We note that the endorsed traffic report states:

During Stage 1, students will be transported by private school bus to/from Harkaway Hills College, as shown in the figure below. Parents will only be permitted to drop children off or pick them directly from the school outside of regular start and finish times of 8-9am and 3-4pm when the bus service is not operating. Examples of this is when a child is completing extra-circular activities or in after-school care.

At Stage 2, parents will be permitted to drop-off/pick-up children directly. This requires signalisation of the intersection of Horswood Road/Belgrave-Hallam Road to accommodate the school traffic.

Given that there will be a minimal increase to vehicular traffic as a result of the increase in student numbers, as the students will continue to be transported to the site by bus until such time that the intersection is completed, the increase from 153 to 189 in Stage 1A and 239 in Stage 1B is considered appropriate. We refer to the submitted Traffic Letter of Support on this matter that confirms that the road network, particularly the intersection of Horwood Road and Belgrave-Hallam Drive has capacity for the additional bus movements required to transport students in Stages 1A and 1B.

Consideration of the nearby uses

We note that the changes to the operating hours are not proposed to have an impact on the neighbouring sites. It is submitted that many of the activities will be undertaken internal to the school and therefore, any noise impacts will be contained. If there are outdoor activities planned, these are to be located within the west of the site during daylight hours where the sporting fields and courts are located and therefore, will not be visible and unlikely to be audible from the equestrian in the east or Montague Farms to the north. These activities are typical of any school operation and are considered appropriate in the sites context and considering a permit has been issued for the use of a school.

Conclusion

The proposed amendments to the permit are required to update the permit to accord with operational requirements of the school to ensure it's viable. We note that whilst draft conditions of the permit were circulated, these conditions were not included in that draft provided and therefore, were unable to be reviewed prior to issuing of the permit. It is submitted that these conditions are not practical for a school as there are many activities that are required to occur outside of school hours to support the school curriculum. These permit condition changes are appropriate and align with the orderly development of the site and those typical to any school. The impact to the surrounding street and neighbouring sites is negligible noting many activities will occur indoors and those that are outside will be during daylight hours or early evening and are within the western portion of the site, therefore away from the existing uses in the north and east.

In support of the application, we enclose the following:

1. Traffic Letter of Support, prepared by Traffix Group dated 25 September 2025
2. Traffic and Parking Management Plan, prepared by Traffix Group dated September 2025
3. Certificate of Title
4. Updated Staging Plan

We trust the above is acceptable to DTP and look forward to hearing from you in due course.

If you have any queries regarding the above, please contact the undersigned on 9794 1600 or via email at manager@klms.com.au

Yours sincerely,



Jessica Carlile
KLM Spatial

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