

Planning Assessment Officer Report

PA2503605 - 46 Cross's
Road, Traralgon – St Paul's
Anglican College



Planning Assessment Officer Report
Development Assessment

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Executive Summary



Key Information		Details		
Application No:	PA2503605			
Received:	17 March 2025			
Statutory Days:	44			
Applicant:	St Paul's Anglican College c/- G2 Urban Planning			
Planning Scheme:	Latrobe			
Land Address:	46 Cross's Road, Traralgon			
Proposal:	Construction of a building (single storey VCE learning centre) and associated works associated with a Section 2 Use (secondary school)			
Development Value:	\$ 7m			
Why is the Minister responsible?	In accordance with the schedule to Clause 72.01 of the Planning Scheme, the Minister for Planning is the responsible Authority for this application because: It is in relation to the use and development of land for a secondary school where the estimated cost of development is \$3 million or greater.			
Why is a permit required?	Clause	Control		Trigger
Zone:	Clause 37.09-10	Neighbourhood Zone Schedule 4 (NRZ4)	Residential	Construct a building or construct or carry out works associated with a Section 2 Use
Cultural Heritage:	A CHMP is not required. The proposed works are not located in or within 50 metres of an area of cultural heritage sensitivity and per regulation 46(3) of the Aboriginal Heritage Regulations, the construction of a building associated with a high impact land use activity that was lawfully commenced on the land prior to 28 May 2007 (school was established in 2001) is exempt.			
Total Site Area:	56.78	hectares		
Gross Floor Area:	1,672	m² (proposed building only)		
Height:	Single storey, maximum building height is 8.525m			
Land Uses:	P-12 Non-Government school with ancillary childcare centre			
Referral Authorities:	N/A			
Public Notice:	The application was not exempt from notice per Clause 32.09-13 of the Neighbourhood Residential Zone. Notice was carried out pursuant to Section 52(1)(b) to Latrobe City Council, who did not object to the proposal. Notice of the application per Section 52(1)(a) or (d) was not required necessary in this instance as the proposal building was deemed to not create any material detriment to adjoining and surrounding properties.			
Delegates List:	Not required.			



Application Process

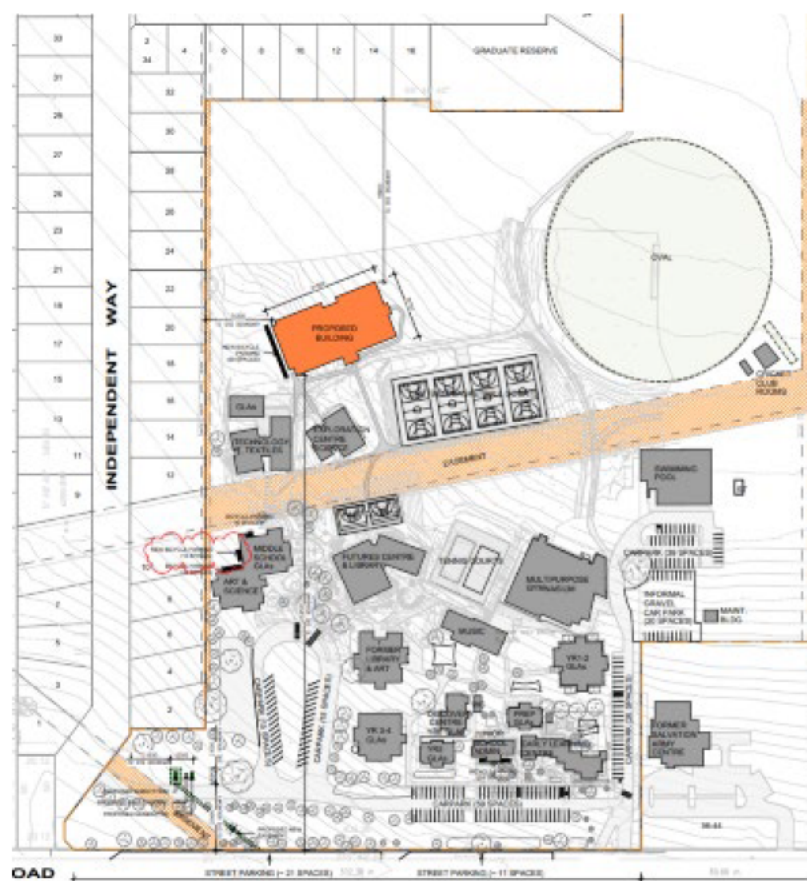
1. The site has been operating as a non-government school since the original planning permit (Planning Permit 01113) was issued by Latrobe City Council in 2001. Since then, a number of planning permits have been issued to enable the continued expansion of the use and associated development. In addition, planning permit 04478 was issued by Latrobe City Council in 2005 for a residential subdivision in a portion of the previous school site, which now comprises the dwelling along Independent Way and Graduate Place to the school's north and west.
2. The most recently issued planning permit which relates to the regulation of the use of the land as a secondary school is planning permit 2021/172 which was issued by Latrobe City Council on 13 September 2021 for 'development of land with anew building ancillary to the existing education centre, display of business identification signage and a reduction in car parking and bicycle requirements, in accordance with the endorsed plans'. This planning permit approved a car parking and bicycle reduction which permitted the land to now accommodate up to 65 FTE staff for a total of 648 secondary school students.
3. The key milestones in the application process were as follows:

Milestone	Date
Pre-application meeting	N/A
Application lodgement	18 March 2025
Further information requested	4 April 2025
Further information received	12 May 2025
Further plans submitted on 20 May 2025 formally under s50 of the Act	In summary, the formally substituted plans and accompanying documents sought to delete planning permission sought for a car and bicycle parking reduction from the application, as it was revealed that this had already been approved under another planning permit.
Decision Plans	Plans prepared by Smith and Tracey Architects , titled ' St Paul's Anglican Grammar School – VCE Centre & Specialist Hub ' and dated 19 May 2025.
Other Assessment Documents	Planning Report prepared by G2 Urban Planning and dated 17 March 2025. Addendum to planning report prepared by G2 Urban Planning and dated 9 May 2025. Addendum to planning report prepared by G2 Urban Planning and dated 20 May 2025

4. The subject of this report is the decision plans (as described above).

Proposal Summary

5. The proposal can be summarised as follows:
 - The proposed building is located in the north-western corner of the current school site and will be the most northern building constructed. The building has generous setbacks from the western (35.2 metres) and northern (96.9 metres) title boundaries and is setback 253 metres from the school's frontage to Cross's Road.



- It is proposed to construct a single storey VCE and specialist centre building containing classrooms, specialist labs, bathrooms, staff rooms and storage. External lockers and bicycle parking for 50 bicycle are located along the building's western façade and a plant equipment area to the north of the building. Areas of paving and landscaping surround the building and paths connecting the building entries to the surrounding school development are also proposed.



- The building utilises several sections of pitched skillion forms and a neutral material palette of bricks, metal profiled cladding and Colorbond roofing.
- The large building footprint (1,672m²) and consistent finished floor level throughout the building in this location of the site where there is a significant fall north-east to south-west across the site results in notable cut and fill required for the building. The building sits a maximum of 2.4 metres below natural ground level in the south-western corner and sits a maximum of 1.9 metres above natural ground level in the north-western corner. It is proposed to rationalise the level changes within the open land which surrounds the building through tapered embankments and batter slopes.



Figure 3 – Southern elevation demonstrating extent of site cut and fill (red dashed line being NGL)



Figure 4 – Artist interpretation of southern elevation, showing the variation to roof form, proposed materiality etc.

- It is noted that the building is to facilitate the secondary school's expansion into VCE year levels (Year 11 and 12), with the resulting increase in student numbers accommodated on site already approved under a previous planning permit. This was not clear when the application was lodged, resulting in a subsequent s50 amendment application to remove a request for a reduction of car and bicycle parking from the proposal.



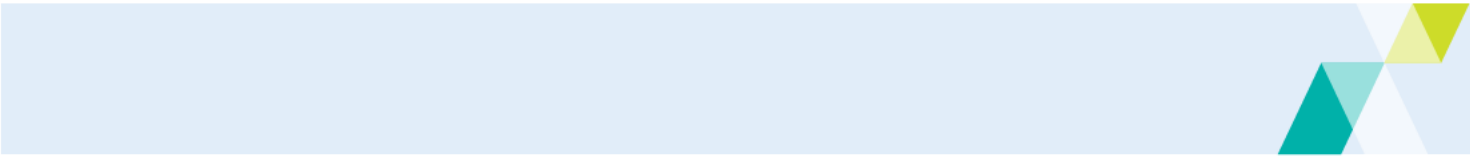
Site Description

6. The site is located at **46 Cross's Road, Traralgon**, also known as Lot 2 on Plan of Subdivision 537950B. The existing site comprises various buildings and ancillary structures (car parking, access roads, sports courts and facilities) associated with a P-12 non-government school with an ancillary childcare centre. Further north of the area of the site developed for the school is a gravel access track and dams/stormwater retarding basins which serve as the site's legal point of discharge.



Figure 5 – Existing school site and surrounds as of 16 April 2025 (not pictured, wetland LPOD further north of the oval)

7. The overall site is 56.78 hectares with the majority of this land being undeveloped, open space that eventually terminates along the northern boundary at the banks of the Latrobe River. The general area of the site set aside primarily for the school is only approximately 26.75 hectares, with a large portion of this area to the north of the existing buildings on site currently undeveloped. The site's main vehicle and pedestrian entrance is from an entry in the eastern corner of its Cross's Road frontage, with a secondary vehicle access point also afforded adjacent to the roundabout from Independent Way, in the site's south-western corner.
8. The site contains several easements set aside for various purposes however none of these are in close proximity to the proposed building. There are also two restrictions registered to the site's certificate of title which are summarised as follows:
- Section 173 Agreement AB765313E which is derived from the planning permit from 2001 which authorised the original school use and development and required certain traffic, parking and drainage infrastructure matters to be attended to at certain points in the school's development. All of these milestones have since passed and the required works completed.
 - Section 173 Agreement AE336267C which is derived from planning permit 04478 issued in 2005 to facilitate a residential subdivision at Lot 1 of Plan of Subdivision 537950B. This agreement related to the requirement of drainage infrastructure works as a result of the residential subdivision to occur over the school land. These



works have been completed however there remains an ongoing obligation for St Paul's to ensure that drainage water will be retained within the land to the satisfaction of the Responsible Authority.

Site Surrounds

9. The surrounding development consists mainly of residential land used and developed for residential purposes and is generally of a low-density nature, consisting of single and double storey detached housing on suburban lots. The site is located towards the north-western periphery of the town of Traralgon, with the predominate use of the land transitioning to agricultural purposes to the north and west, on the other side of the Latrobe River.
10. Development surrounding the site can be described as follows:
 - To the **north** of the site: The rear boundaries and backyards of dwellings located on Graduate Way and, further north, the banks of the Latrobe River.
 - To the **south** of the site: Cross's Road, a two-way, two lane connector road which includes indented parking, bus stops and pedestrian crossings in proximity to the school site. Opposite the site on the southern side of Cross's Road are low density residential dwellings which front Cross's Road.
 - To the **east** of the site: The rear boundaries and backyards of dwellings located on Grammar Drive and in the south-east of the site at 36-44 Cross's Road, a now vacant non-residential building (previously a Salvation Army Centre) with associated car parking areas.
 - To the **west** of the site: The rear boundaries and backyards of dwellings located on Independent Way.



Municipal Planning Strategy

11. The following objectives and strategies of the Municipal Strategic Statement of the scheme are relevant to the proposal:

Clause	Description
02.01	Context
02.02	Vision
02.03-1	Settlement
02.03-3	Environmental Risks and Amenity
02.03-4	Natural Resource Management - Water
02.03-5	Built environment and heritage
02.03-9	Infrastructure

Planning Policy Framework

12. The following objectives and strategies of the Planning Policy Framework of the scheme are relevant to the proposal:

Clause 11	Settlement
11.01-1L	Latrobe settlement patterns - Traralgon
Clause 13	Environmental Risks and Amenity
13.02-1S	Bushfire planning
13.02-1L	Bushfire prone areas
Clause 14	Natural Resource Management
14.02-1S	Catchment planning and management
Clause 15	Built Environment and Heritage
15.01-1S	Urban Design
15.01-1L	
15.01-2S	Building Design
15.01-5S	Neighbourhood Character
15.01-5L	
Clause 19	Infrastructure
19.02-2S	Education facilities
19.02-2L	
19.03-3S	Integrated water management
19.03-3L	

Zoning and Overlays

Applicable Zone

13. A planning permit is required to construct a building or construct or carry out works associated with a section 2 use in accordance with the Neighbourhood Residential Zone (Schedule 4). The purpose of the **NRZ** is:
- To implement the *Municipal Planning Strategy* and the *Planning Policy Framework*.

- To recognise areas of predominantly single and double storey residential development.
- To manage and ensure that development is responsive to the identified neighbourhood character, heritage, environmental or landscape characteristics.
- To allow educational, recreational, religious, community and a limited range of other non-residential uses to serve local community needs in appropriate locations.

14. More specifically, Schedule 4 of the Neighbourhood Residential Zone's objectives includes:

- To reinforce a spacious regional suburban character of existing and new neighbourhoods by providing generous front and side building setbacks and landscaped front setbacks with canopy trees.
- To minimise the prominence of buildings within the streetscape by setting back upper levels of buildings and siting garages and carports behind the front façade.
- To encourage walls on boundaries to be setback from the building façade to provide space for landscaping, building articulation and appearance of space between dwellings.

15. The following sections include a discussion of how the proposal responds to these requirements.

Other Zones

16. It is noted that the northern portion of the site (see figure 6) is located within the Farming Zone (Schedule 1) however, as no part of the building and works is proposed in this zone, its provisions do not apply to this application.

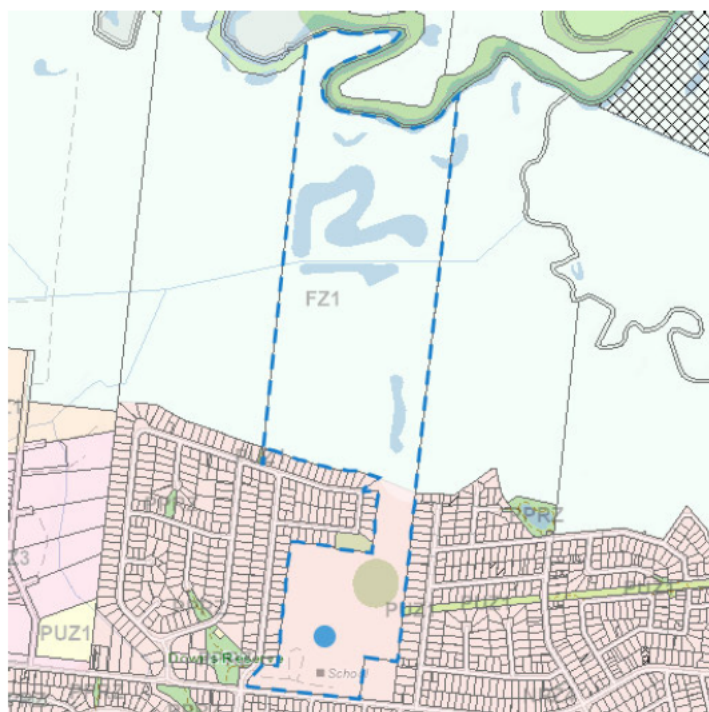


Figure 6 – the overall site area and extent of Farming Zone that applies to the north of the site

Applicable Overlays

17. There are no overlays which impact the area of the site where buildings and works are proposed under this application.



Other Overlays

18. The Land Subject to Inundation Overlay, Floodway Overlay and the Buffer Area Overlay (Schedule 1) apply to the greater site further to the north but not the location of the proposed works subject to this application. These overlays, therefore, do not form part of this assessment.

Particular and General Provisions

Provisions that Require, Enable or Exempt a Permit

19. Clause 52.06 sets out the requirements for car parking provision and car parking design. As noted elsewhere in this report, the application does not seek authorisation of an increase to secondary school staff associated with the site as a result of the proposed building. Therefore in accordance with Clause 52.06-3, the scope of this provision does not apply to this application. No changes are proposed to the existing car parking on site as result of this proposal.
20. Clause 52.34 sets out the requirement for bicycle parking facility provision and design and for similar reasons as the above, does not apply to this application. Despite this, it is noted that the applicant has opted to provide additional bicycle parking (60 spaces for secondary school) as part of the proposed development, reducing the extent of reduction required. However, as a reduction for a greater number of bicycle spaces has already been approved under a separate planning permit, there is no requirement to assess the provisions of Clause 52.34 for this application.

General Requirements and Performance Standards

21. Clause 53.18 applies to the buildings and works of this application. The clause includes standards and objectives relating to stormwater at Clause 53.18-5 (Stormwater management objectives for buildings and works – Standard W2) and Clause 53.18-6 (Site management objectives – Standard W3).
22. Clause 53.19 applies to an application under any provision (other than VicSmart) to use or development land for a primary or secondary school. The purpose of this provision is to facilitate new non-government schools and upgrades and extension to existing non-government schools. This provision also at Clause 53.19-2 exempts applications under Clause 53.19 from the decision requirements of 64(1), (2) and (3) and the review rights of Section 82(1) of the Act.

Relevant Strategic Plan / Background Documents

23. There are no incorporated documents relevant to the proposal or any pending planning scheme amendments which may be relevant.
24. The following background documents are relevant to assessment of the proposal:
- *Latrobe City Municipal Fire Management Plan 2018*
 - *Latrobe City Council Urban Design Guidelines 2021*
 - *Urban Stormwater - Best Practice Environmental Management Guidelines 1999*



Referrals

25. The application was not required to be referred to any referral authority under any provision of the planning scheme.

Municipal Council Comments

26. Latrobe City Council (the council) considered the application upon receipt of notice under Section 52(1)(b) of the Act and provided a response on 5 June 2025
27. The council determined that it did not object to the proposal and recommended a number of planning permit conditions to be included on any planning permit issued. The conditions were standard/technical in nature and did not seek any changes to the proposal.
28. The council also noted the lack of a complete stormwater management assessment report accompanying the application. While they did not consider that the proposed additional buildings and works and associated stormwater runoff to be of concern provided it is direct to the existing legal point of discharge, it was noted that the existing wetland/retarding basin which is regulated by Section 173 Agreement AE336267C may need enlarging to account for stormwater run off from the adjoining residential subdivision that is now completed.

Notice

29. The application is not exempt from the notice requirements of section 52(1)(a), (b) and (d), the decision requirements of section 64(1), (2) and (3) and the review rights of section 82(1) of the *Planning and Environment Act 1987* pursuant to the following provisions:
 - Clause 32.09-13 (Neighbourhood Residential Zone)
30. The application is exempt from the decision requirements of section 64(1), (2) and (3) and the review rights of section 82(1) of the *Planning and Environment Act 1987* pursuant to the following provisions:
 - Clause 53.19-2 (Non-government schools)
31. The application was not advertised other than to the municipal authority under section 52(1)(b) as it was considered not to cause material detriment to any person because:
 - The proposed single storey building is a proportionately minor development in the context of the overall school site.
 - The low building height and extremely generous setbacks from any sensitive interfaces (minimum setback 35.3 metres to the nearest residential property).

Key Considerations

32. The following are deemed the key considerations in assessing the acceptability of the proposal:
- The relevant provisions of the Municipal Planning and Planning Policy Framework related to urban development, education facilities and stormwater management.
 - The purpose and relevant decision guidelines of Schedule 4 of the Neighbourhood Residential Zone.

Strategic Direction and Land Use

33. The *Planning Policy Framework* encourage appropriate land use and development which enhances the built environment, supports economic growth, meets the community expectations on retail and commercial provision, delivers diversity in housing supply to meet existing and future needs, and integrates transport and infrastructure planning.
34. The relevant MPS and PPF policies have been considered in assessing the application and are supported by facilitating the expansion of the existing school's secondary school facilities within Traralgon, the region's main urban centre and leader in population and urban growth per Clause 02.03-1 (Settlement). The existing school is ideally located in an established residential area in proximity to several residential supply areas identified in the Traralgon Structure Plan (see figure 7). This is consistent with the strategies at Clause 19.02-2S (Education facilities) which includes facilitating the expansion of primary and secondary school facilities to meet the existing and future needs of communities.

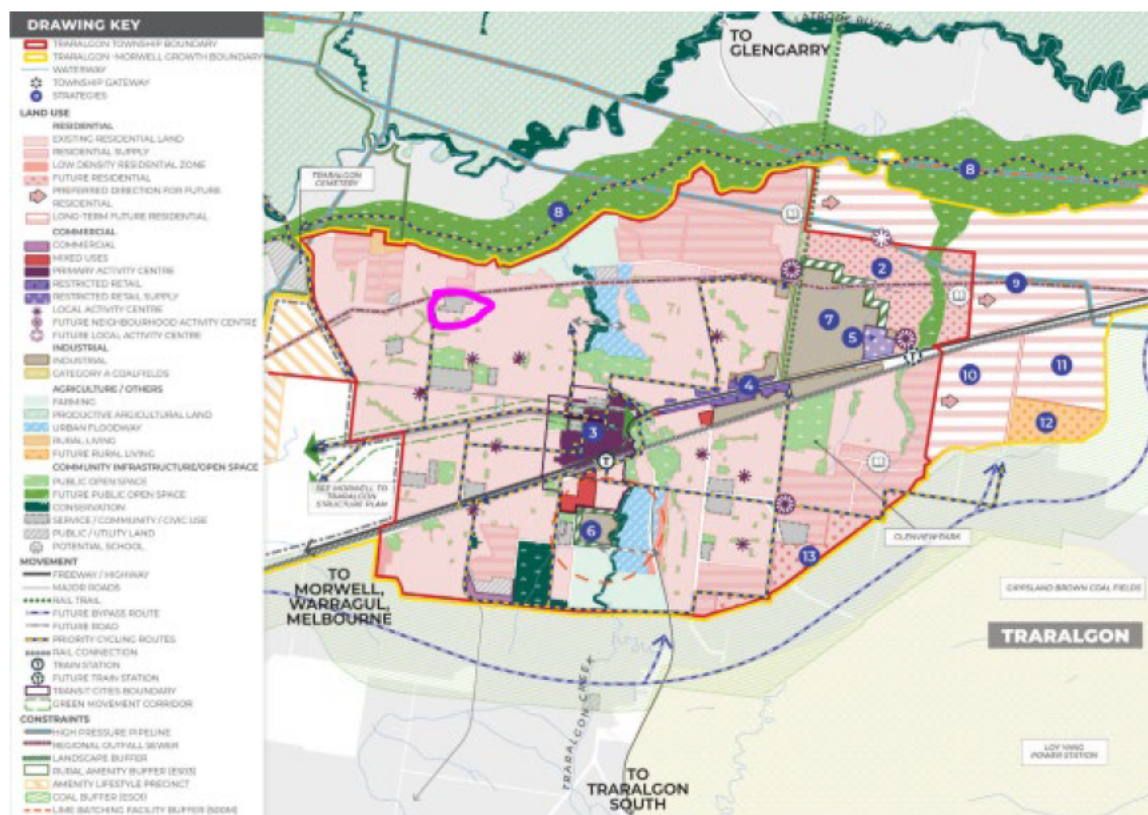


Figure 7 – Traralgon Town Structure Plan (subject site circled in pink)

35. With regards to the decision guidelines of NRZ4 related to non-residential uses, it is noted that the proposal does not create an increased intensity in the use of the land or seek to alter the existing use operations. However, conditions of the planning permit will ensure that any amenity impacts (such as noise) that may be generated by extending the use of the land into this area of the site will be adequately regulated and attended to.



Buildings and Works

36. The zoning provisions have been considered in the application. This includes the purpose of the zone, which is to recognise area of predominately single and double storey residential development and ensuring any development is responsive to the identified neighbourhood character, heritage, environmental or landscape characteristics.
37. More specifically, schedule 4 to the zone which relates to 'Regional Suburbs' includes other objectives which seek to reinforce a spacious regional suburban character through generous setbacks and landscaping as well as minimising the prominence of buildings within the streetscape.
38. With regards to these matters, the proposed development is single storey in height and in line with the scale of other buildings on site and the residential development which surrounds the school, while the maximum height of 8.525 metres does not exceed the mandatory height restriction at Clause 32.09-11 of 9 metres which applies to residential buildings. The building is generously setback from surrounding property boundaries (35.3 metres from the western boundary, 96.3 metres from the northern boundary), contributing to the 'spacious regional suburban character'.
39. These setbacks will be softened by minor landscaping works that are commensurate to the nature of landscaping across the existing school, which will be further detailed in a landscape plan to be submitted for endorsement as a condition of the planning permit. It should be noted that the proposed building is sited behind a number of other buildings which sit between it and the site's street frontage to Cross's Road which is 293 metres to the building's south and its therefore not anticipated to be particularly visible let alone prominent to the streetscape.
40. Additionally, the decision guidelines of the zone have been considered and it is noted that no overshadowing or overlooking to residential properties occurs as a result of the proposed building. As noted above, the scale of the development is also compatible with the surrounding residential use and development. The design and appearance of the proposed building is distinctly non-residential but incorporates built form elements including articulated external walls, pitched roofs, a primarily brick finish etc. and uses neutral tones for all finishes which complementary to the nearby residential dwellings.
41. The development does not introduce any new considerations for waste and loading or vehicle access and parking as the site's existing operations continue to be utilised. The provision of 60 bicycle parking spaces to accompany the new secondary school building is also considered a positive contribution considering the site's currently low provision of bicycle parking, despite not technically being required by Clause 52.34 (Bicycle Parking Facilities). The connection of the building to the rest of the school grounds through pathways has been considered and ensure the building is well integrated into the rest of the site.

Environmental Risks

Bushfire Risk

42. It is noted that the northern section of the overall site has been designated as a bushfire prone area. This area is approximately more than 300 metres away from the proposed building and as per Section 192A of the *Building Act 1993* a designated bushfire prone area refers only to the area as mapped by the Minister, so does not include the location of the proposed building. Therefore, it is considered that the provisions of Clause 13.02-1S and 13.02-1L as they relate to planning in designated bushfire prone areas are not relevant to the application.
43. Any building or design requirements which may be relevant due to the building's proximity to land designated as bushfire prone will still need to be determined at building permit stage.

Sustainability

Water Sensitive Urban Design (WSUD)

44. In accordance with Standard W2 of Clause 53.18 (Stormwater management in urban development) the building's stormwater management is required to be designed to meet the current best practice performance objectives for stormwater quality as contained in the *Urban Stormwater – Best Practice Environmental Management Guidelines 1999*. This in keeping with the objectives of this clause to encourage stormwater management that maximises the



retention and reuse of stormwater and reduce the impact of stormwater on the drainage system. These objectives are also echoed by Clause 19.03-3S and 19.03-3L (Integrated water management).

45. It is noted that a report which uses best practice tools such as STORM or MUSIC modelling to demonstrate compliance with Standard W2 and W3 has not been submitted with the application however, the applicant has indicated this can likely be met through the diversion of stormwater from the building into the school's existing wetland/retarding basin in the north-east of the site. A condition of the planning permit will require a satisfactory report demonstrating compliance with the relevant provisions of the planning scheme for stormwater management to be submitted and the development plans amended to incorporate any of the required WSUD treatment measures as a result.

Stormwater Management

46. The council was generally supportive of this approach, only requesting that a condition of the planning permit stipulate that all stormwater run off from the building must divert to the site's existing legal point of discharge (on-site wetland). The council did raise that the wetland may require upgrading/enlargement imminently however this appears to be due to the completion of residential development in the adjacent subdivision which also utilises this legal point of discharge as a result of s173 Agreement AE36267C, rather than as a result of the proposed building itself. A permit note to this effect will be included on the planning permit.
47. Subject to the above conditions, the proposal will result in appropriate stormwater outcomes.

Other Matters

Cultural Heritage

48. It is noted that part of the overall site area is located within area of cultural heritage sensitivity as they are within 200 metres of a waterway (Latrobe River) and there also used to be a tree of cultural heritage significance in the site's south-western corner which has since died. The proposed buildings and works are not located within either of these areas, or within 50 metres of the registered cultural heritage place in the south-west of the site in accordance with regulation 25(2) of the *Regulations*.
49. Per Division 3, Part 2 of the *Aboriginal Heritage Regulations 2018*, requirements for a CHMP for high impact activities are only applicable if all or part of the activity area is within an area of cultural heritage sensitivity, with the activity area defined in Division 1 part 5 as 'the area to be used or developed for an activity'. Therefore, as the 'activity area' of this application is not located within an area of cultural heritage sensitivity, a CHMP is not required.



50. The proposal is generally consistent with the relevant planning policies of the Latrobe Planning Scheme and will contribute to facilitating the expansion of existing secondary school facilities in Traralgon to meet the needs of the community and non-residential development which is responsive to low-scale and spacious regional suburban nature of the surrounds.
51. The proposal is supported by Latrobe City Council, with minor conditions recommended to be included which have generally been adopted in the recommended conditions.
52. It is **recommended** that Planning Permit No. **PA2503605** for the construction of buildings and works associated with a section 2 use at 46 Cross's Road, Traralgon be issued subject to conditions.
53. It is **recommended** that the applicant and the council be notified of the above in writing.

Prepared by:

I have considered whether there is a conflict of interest in assessing this application and I have determined that I have:

☒ **No Conflict**

☐ Conflict and have therefore undertaken the following actions:

☐ Completed the **Statutory Planning Services declaration of Conflict/Interest form**.

☐ Attached the Statutory Planning Services declaration of Conflict/Interest form on to the hardcopy file.

☐ Attached the Statutory Planning Services declaration of Conflict/Interest form into the relevant electronic workspace.

Name:

[Redacted]

Signed:

[Redacted]

Title: Senior Planner, Development Assessment

Phone:

[Redacted]

Dated:

30 June 2025

Approved by:

I have considered whether there is a conflict of interest in assessing this application and I have determined that I have:

☒ **No Conflict**

☐ Conflict and have therefore undertaken the following actions:

☐ Completed the **Statutory Planning Services declaration of Conflict/Interest form**.

☐ Attached the Statutory Planning Services declaration of Conflict/Interest form on to the hardcopy file.

☐ Attached the Statutory Planning Services declaration of Conflict/Interest form into the relevant electronic workspace.

Name:

[Redacted]

Signed:

[Redacted]

Title: Manager, Development Assessment

Phone:

[Redacted]

Dated:

2 July 2025