



ADVERTISED PLAN

Anne-Marie Edgley
Senior Planner, Development Assessment
Department of Transport and Planning
Sent Electronically Via ePlanning Portal

9/12/2025

Dear Anne-Marie,

**RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION
PLANNING PERMIT APPLICATION PA2503929
3 NORTONS LANE WANTIRNA SOUTH VIC 3152**

**This copied document to be made available
for the sole purpose of enabling
its consideration and review as
part of a planning process under the
Planning and Environment Act 1987.
The document must not be used for any
purpose which may breach any
copyright**

1. INTRODUCTION

Dartmouth Consulting Pty Ltd continues to act on behalf of Ayk Nominees Pty Ltd regarding the property at 3 Nortons Lane, Wantirna South.

We write in response to your Request for Further Information (RFI) letter dated 7 November 2025 requesting further information pursuant to Section 54(1) of the *Planning and Environment Act 1987*.

This letter addresses how the information submitted satisfies the RFI and a response to the preliminary matters raised by the Department of Transport and Planning (DTP) and Knox City Council. It is supported by the following documentation:

- Amended Architectural Plans, prepared by MSM Architects Pty Ltd.
- Response to Council RFI, prepared by Ratio Consultants Pty Ltd, dated 9 December 2025.
- Response to HTfV referral, prepared by Ratio Consultants Pty Ltd, dated 9 December 2025
- Amended Town Planning Report, prepared by Dartmouth Consulting, dated 9 December 2025.
- Landfill Gas Risk Assessment, undertaken by Prensa Pty Ltd, dated November 2025.
- Updated landscape concept plan, prepared by Ratio Consultants Pty Ltd.
- Updated arborist report, prepared by TreeLogic Pty Ltd, dated 27 November 2025.

We note that in preparing this response, a meeting was held between the DTP and the applicant to discuss the RFI and provide an outline of the applicant's further clarifications in respect to the proposed staging of the development and use, including the capping of student and staff numbers at each stage, as well as a commitment to upgrade Nortons Lane and the Nortons Lane intersection at High Street Road as necessary. We are also arranging a meeting with Knox City Council to discuss its specific concerns which we anticipate will occur this week.

It should be noted that while the Head transport for Victoria (HTfV) has objected to the proposal in their referral response letter dated 18 November 2025 as a determining referral authority under Section 55 of the *Planning and Environment Act 1987* (the Act), their letter makes a provision that HTfV may reconsider their position if an access arrangement can be presented that addresses the road safety and operational issues at the High Street Road and Nortons Lane intersection. HTfV's comments are addressed further in Section 4 of this letter and further supported by the detailed response and review by Ratio Consultants Pty Ltd.

We ask that DTP refer the updated application material including the responses to the Head of Transport for Victoria (HTfV) for further review. Should at that time HTfV maintain its objection, then the applicant understands that DTP is required to refuse the application. However we ask that in the first instance HTfV, and Council, are given an opportunity to consider the responses provided.

It is considered that the detailed response provided in this package of information addresses the concerns raised by HTfV and Council in respect to the suitability of Nortons Lane to accommodate the anticipated traffic associated with the proposed College in the initial stages of the use and development of the land.

To assist in better understanding the proposed staging of development and student numbers, the following table is provided, assuming the school use commencing in 2027:

Table 1: Proposed School Staging

STAGE	YEAR	STUDENT NUMBERS (maximum)	STAFF NUMBERS (maximum)	Portable Buildings – refer to attached staging plan for Stage 1 Portable buildings
Stage 1A	2027 (Grades P-1)	50	6	Admin & Classrooms (south of deck)+ toilets
	2028 (Grades P-2)	70	7	Admin & Classrooms (south of deck)+ toilets
Stage 1B	2029 (Grades P-3)	80	8	Admin & Classrooms (south of deck plus 2 additional on north of deck) + toilets
	2030 (Grades P-4)	100	10	Admin & Classrooms (south of deck plus 2 additional on north of deck) + toilets
Stage 1C	2031 (Grades P-5)	120	11	Admin & Classrooms (south of deck plus 4 additional on north of deck) + toilets
	2032 (Grades P-6)	130	12	Admin & Classrooms (south of deck plus 4 additional on north of deck) + toilets
	2033 (Grades P-6)	140	13	Admin & Classrooms (south of deck plus 4 additional on north of deck) + toilets
	2034 (Grades P-6)	150	13	Admin & Classrooms (south of deck plus 4 additional on north of deck) + toilets

The numbers presented in this table shows a maximum number of students per stage with it being highly likely that in the early stages of the College's operation the actual number of students will be considerably lower.

In the early stages (Stage 1A to Stage 1B), the recommendation is to provide passing areas within the section of Nortons Lane where it is currently single lane in locations to be determined with investigation and details design including ecological, arboricultural and engineering.

The Applicant accepts that upgrades to Nortons Lane and mitigation works to the intersection with High Street Road are warranted, however it is submitted that the timing for these works will be triggered under Stage 1C when the maximum number of students would be 120 and 11 staff. This position is based on the further detailed traffic analysis undertaken by Ratio Consultants. The upgrade works would consist of the sealing of the section of unmade carriageway within the existing extent of the road.

It will be appropriate to include a condition in the permit that would trigger the upgrade works at that time and with the works being subject to the satisfaction of the Knox City Council and HTfV. Such conditions, which provide for staging of occupation and staging of infrastructure works, are common practice and easily enforceable as conditions on a permit and may include a requirement for a section 173 Agreement.

We also confirm that the College will use a private bus service operating solely for the purpose of picking up students from their homes to be dropped off at the site within the car parking area. The service will also operate

in the afternoon drop off where students will then be dropped off directly to their homes. This service will significantly reduce the number of vehicular movements to the site during the AM and PM periods with the only cars accessing the site will be associated with staff.

The Ratio Consultants report has considered the reduction of vehicular trips to the site due to the use of this service in calculating the anticipated traffic movements to and from the site.

In addition to the breakdown of proposed staging identified above, the plans have also been amended to reflect the proposed staging and other amendments following further review including:

- Deferring the construction of the southern most row of car parking spaces (15 spaces) adjacent to the southern boundary. These spaces are not required under this application and will be delivered in a future stage and subject to future application.
- The floor plans have been updated to show the allocation of classrooms, art room, multi-purpose room and library space to reflect the intended use of these rooms in this stage.
- The plans and supporting arborist report has been updated to include the removal of Tree 10 and Tree 27 located along the southern boundary of the site. These trees are required to be removed to accommodate future infrastructure along the boundary and these trees are not able to be retained.
- The proposed fencing to the Nortons Lane frontage, entry gate and retaining walls design has been amended following further review from a detailed design perspective.

Please refer to the following sections which outlines our responses to the various matters raised by DTP, Knox City Council, HTFV and Fire Rescue Victoria.'

2. FURTHER INFORMATION REQUESTED

A response to DTP's request for further information is provided in Table 2 below.

Table 2: Response to Request for Further Information

Item	Request	Response
1	Clarification and/or further information on the schools intended plans for Nortons Lane in conjunction with the proposed use and development of the primary school.	As outlined in Section 3 of the Amended Planning Report submitted with this letter, the applicant intends to deliver any upgrades required by Head, Transport for Victoria (HTFV) to obtain their support for the proposal. The proposal also includes the staging of development, inclusive of maximum staff and student numbers at each stage, to ensure that Nortons Lane (including the Nortons Lane and High Street Road intersection) operate efficiently into the future.
2	A Transport Management Plan (TMP) prepared by a suitably qualified traffic engineer to detail how transport will be managed on the site.	Please refer to the detailed responses provided by Ratio Consultants for a response to the requirements of the Traffic Management Plan.
3	A response to the concerns raised by Knox City Council, see letter dated 3 October 2025.	A response to the concerns raised by Knox City Council is provided in Section 3 of this letter.

3. KNOX CITY COUNCIL COMMENTS

Council's comments outlined in their letter dated 3 October 2025 are addressed in Table 3 below.

Table 3: Response to Council Comments

Summary	Response
Land Fill Gas	

Summary	Response
<p>The subject site is located within the Farming Zone and is not affected by any overlays. However, it is noted that the eastern portion of the site (highlighted red) is located within a 500mm Landfill Buffer.</p>	<p>A Landfill Gas Risk Assessment has been undertaken by Prensa Pty Ltd which has evaluated the potential landfill gas risk to the proposed school from the former landfill to the east of the site.</p> <p>The assessment included site inspections and methane monitoring with the results confirming low potential for landfill gas to be present beneath the site and additional assessment, mitigation or monitoring is not required. Please refer to the attached report.</p>
Vegetation & Landscape	
<p>As the site is not affected by any overlays, the only vegetation controls that are required to be considered are Clause 52.17 (Native Vegetation) of the Planning Scheme.</p>	<p>Clause 52.17 is addressed in Section 4.2 of the Amended Planning Report submitted with this letter and this has been provided as a note only by Council</p>
<p>It is noted that sections along Nortons Lane are affected by the Environmental Significance Overlay (Schedule 2) and are considered a Site of Biological Significance in Knox. In particular, areas along Nortons Lane fall within Site 28 – Dandenong Valley Parklands, which features a variety of nationally, state, regionally and locally significant flora and fauna.</p>	<p>We acknowledge that there are areas of the ESO2 which apply to sections of Nortons Lane and which must be assessed when future works to Nortons Lane are required or proposed. In terms of future road upgrades, which may include creation of passing areas and sealing of the road, a planning permit for works in the ESO2 will be triggered at that point in time and any application must consider the matters of significance under the ESO2.</p>
Road Access	
<p>Council raises concerns regarding the suitability of Nortons Lane as the primary access route to the proposed primary school. Nortons Lane is currently an unsealed road, which may not be adequate to support the increased traffic volumes associated with a new primary school.</p>	<p>In support of the application, Ratio Consultants have provided a detailed response letter dated 8 December 2025.</p> <p>To better understand the current capacity of Nortons Lane, traffic counts were undertaken in Norton Lane south of the existing access points to Nortons Park. This is the section of road which narrows to a single lane and is of gravel construction.</p> <p>The following summary of the Ratio response is provided:</p> <ul style="list-style-type: none"> - There is currently a very low volume of traffic utilising Nortons Lane south of Nortons Park with an AM peak of 8 vehicles in the morning between 8.00am and 9.00am and 9 vehicles in the PM peak between 3.00pm-4.00pm. These are the times that correlate to the typical peak periods for an education centre. - There was an average of 86 vehicles per day during the weekly survey period in this section of Nortons Lane. - The ‘Unsealed Roads Best Practice Guide’ published by the Australian Road Research Board (ARRB) in 2020 recommends that an unsealed road should be sealed if traffic volumes exceed 250 vehicles per day. - The southern section of Nortons Lane has the capacity for an additional 164 vehicles before a requirement for the carriageway to be sealed is triggered. - In Stages 1A to 1B, and assuming the use of the private bus service, the daily additional traffic volumes associated with the College in the southern unsealed section of Nortons Lane

Summary	Response
	<p>would be up to 130vpd at the end of Stage 1B. Therefore, during Stages 1A to 1B there is no trigger for the upgrade of Nortons Lane in respect to sealing of the road.</p> <ul style="list-style-type: none"> - Passing lanes in the single width section of Nortons Lane are recommended in the first stage which will include providing areas within the existing road reserve, clear of vegetation, to enable passing of vehicles. These passing areas are only required in the southern section of Nortons Lane between the subject site and the entry points to Nortons Park. - In the first stage, right turn movements from Nortons Lane into High Street are to be banned during school zone hours (8:00am–9:30am and 2:30pm-4:00pm). This restriction would be enforced via signage on Nortons Lane facing northbound motorists. - Once the proposed student numbers reach Stage 1C which is 120 students and 11 staff, mitigation works would be required to Nortons Lane which would include the sealing of the existing carriageway to a suitable standard. <p>The Ratio Consultants report has assessed the impact of the proposed College on the capacity of Nortons Lane and has found that mitigation works, such as sealing of the road, is not required in the first sub-stages of the use. Mitigation works including the sealing of the unsealed sections of the road will be required at the later stages, once student numbers reach 120. Conditions can be included in the Permit to cap student numbers and tie upgrade works to the staging of the use.</p>
<p>Furthermore, the submitted documentation appears to be silent on any immediate infrastructure works or upgrades to Nortons Lane to accommodate the Stage 1 proposal of the primary school. The Transport Impact Assessment predominantly references future infrastructure improvements following the completion of the development approved under Planning Scheme Amendment C194knox, rather than addressing current access requirements.</p>	<p>The College accepts that upgrade works to Nortons Lane and mitigation works to the intersection with High Street Road will be required to be completed prior to student numbers reaching 120 (Stage 1 C). It will be the responsibility of the College to complete those works and the application does not rely on the possible future works associated with Amendment C194knox.</p> <p>The Ratio Consultants assessment confirm that the existing access arrangements in Nortons Lane are suitable for the early stages of the College and there is capacity in the road to accommodate up to 100 students without the requirement to undertake upgrade works to the road.</p>
<p>While the Transport Impact Assessment discusses the potential widening of the road reserve and the provision of a new pedestrian footpath, it does not address the presence of sites of biological significance along Nortons Lane. These environmentally sensitive areas may pose constraints on future road and infrastructure upgrades and should be considered in any future planning or design responses.</p>	<p>It is acknowledged that there are sites of ecological significance along Nortons Lane which will be required to be considered as part of any future road upgrade works.</p> <p>The required mitigation works include:</p> <ul style="list-style-type: none"> - Creation of passing areas in the single width section of Nortons Lane in the early stages (1A to 1B). - Right turn movements from Nortons Lane to High Street Road from the intersection be banned during the AM and PM Peak periods with signage. - Sealing of the road between the subject site and the sealed section of the road adjacent to Nortons Park to the satisfaction of Knox City Council from Stage 1C onwards.

Summary	Response
	<p>While the final design of these works will be subject to detailed assessment they will be able to be completed within the existing road reserve and are unlikely to significantly impact existing vegetation. It must also be acknowledged that Nortons Lane is a public road and its purpose is to provide vehicular access to adjoining properties, including the subject site.</p>
<p>Traffic and Intersection Safety</p>	
<p>Concerns have also been raised about the safety of the intersection at Nortons Lane and High Street. This intersection is currently uncontrolled, lacking traffic signals, and is located on a downhill section of High Street. These factors contribute to limited visibility and challenging traffic conditions, increasing the potential risk of accidents, particularly during peak school drop-off and pick-up times.</p>	<p>Please refer to the more detailed response below under the referral response received by HTfV for a discussion on the intersection of Nortons Lane and High Street Road.</p>
<p>It also appears that the proposed primary school is relying on future infrastructure upgrades associated with the broader development approved under Planning Scheme Amendment C194knox. However, it is considered that the proposed school must be capable of operating independently and should provide the necessary supporting infrastructure as part of its initial development, rather than deferring critical upgrades to a later stage.</p>	<p>As noted, the College accepts responsibility for upgrade works to Nortons Lane and the intersection and it is not trying to transfer the onus of works on the proponent of Amendment C194knox. The mitigation works are triggered during the later stages of this application, and the College is agreeable to conditions being included in any permit</p> <p>We also refer to the servicing report that was provided which confirms that the site is able to accommodate on site services independently without reliance on adjoining developments.</p>
<p>The Transport Impact Assessment indicates that the permit applicant proposes to implement a Transport Management Plan (TMP), which would be distributed to all staff and parents of enrolled students. Should a permit be granted, Council requests that conditions be included to ensure that all provisions, recommendations, and requirements of the endorsed TMP are fully implemented and adhered to. Furthermore, it is considered appropriate that a condition be included to allow for the implementation of remedial measures in the event that traffic issues arise following the commencement of the primary school's operation.</p>	<p>The College accepts a condition should a permit issue that a Transport Management Plan be prepared and endorsed which will set out specific management details of the use of the land.</p>
<p>Waste Treatment</p>	
<p>The Land Capability Assessment Document provides details of on-site wastewater management. Should a permit be granted, Council requests that conditions be included to ensure that all provisions, recommendations, and requirements within</p>	<p>The applicant does not object to conditions on a planning permit to ensure that all provisions, recommendations, and requirements within the Land Capability Assessment are fully implemented and adhered to.</p>

Summary	Response
the document are fully implemented and adhered to.	

4. HEAD, TRANSPORT FOR VICTORIA COMMENTS

Head, Transport for Victoria's (HTfV) comments outlined in their referral response letter dated 18 November 2025 are addressed in Table 4 below.

It is noted that while HTfV have objected to the proposal as a determining referral authority, their letter states the following:

HTfV may reconsider its position if an access arrangement can be presented that addresses the road safety and operational issues at the High Street Road and Nortons Lane intersection. This may include, but is not limited to:

- *Signalisation of the High Street Road and Nortons Lane and Bushy Park Lane intersection.*
- *Upgrading Nortons Lane to an appropriate standard to support safe school access and provide pedestrian and cycling connections to High Street Road.*

It is requested that DTP consider the above statement made in HTfV's letter when reviewing the responses provided in Table 4 below.

Table 4: Response to HTfV Comments

Summary	Response
Concerns	
High Street Road is a declared arterial road carrying high traffic volumes and providing a key east west movement function in the transport network.	We refer to the detailed response provided by Ratio Consultants in respect to the matter raised regarding the current and future operation of the Nortons Lane and High Street Road intersection. In summary, the assessment includes:
The existing unsignalised intersection at High Street Road and Nortons Lane experiences high delays for right turn movements from Nortons Lane, reflecting limited safe gap opportunities and operational constraints.	<ul style="list-style-type: none"> - Turning movement surveys have been conducted in the AM and PM peaks and it is acknowledged that High Street Road carries a high level of through traffic during both periods. - Existing traffic volumes in Nortons Lane are low during the morning and afternoon peak periods.
The school traffic will rely on this intersection to access the site, and no intersection upgrade or supporting works are proposed.	<ul style="list-style-type: none"> - The proposal is expected to generate different volumes at different stages as the number of students and staff grow over the years.
The Transport Impact Assessment relies on behaviour-based measures to encourage left in and left out movements via nearby median breaks. Without physical treatments or intersection upgrades, unsafe right turn movements are likely to continue.	<ul style="list-style-type: none"> - There are no changes required to the intersection to accommodate vehicles turning into Nortons Lane from High Street Road which will utilise existing deceleration lanes in each direction. - For vehicles exiting the site to the intersection, it is recommended that right turn movements from Nortons Lane into High Street be banned during school zone hours (i.e. 8:00am–9:30am and 2:30pm–4:00pm). This restriction would be enforced via signage on Nortons Lane facing northbound motorists.
Limited pedestrian infrastructure restricts safe access to nearby bus stops on High Street Road, which constrains practical public transport use for students and staff.	<ul style="list-style-type: none"> - Based on this mitigation works, all vehicles would be required to turn left into High Street Road. Vehicles wanting to travel eastward (right) would utilise the existing median break

Summary	Response
	<p>located 300m to the west of Nortons Lane to undertake a U-turn and then travel east along High Street Road.</p> <ul style="list-style-type: none"> - In respect to safe gap opportunities for vehicles turning right into Nortons Lane from High Street Road, the nearest upstream traffic signals (located at George Street) are approximately 900m and typically no bunching of traffic is assumed if the offset to the nearest upstream traffic signals exceeds 800 metres. In this instance it is noted that there are only two (2) minor site access points along the southern side of High Street Road between George Street and Nortons Lane. Furthermore, both of these access points appear to be secondary access locations to their respective properties. Accordingly, it is expected that there will be sufficient gaps in traffic flow to accommodate vehicles turning right into Nortons Lane.

5. FIRE RESCUE VICTORIA COMMENTS

Fire Rescue Victoria's (FRV) comments outlined in their referral response dated 4 December 2025 are addressed in Table 5 below.

Table 5: Response to FRV Comments

Summary	Response
<p>FRV considers that the Department of Transport and Planning in determining the application will need to either:</p> <ul style="list-style-type: none"> • Better determine and satisfy itself with the management status of the public land area relevant to the development in line with the above information. • Or appropriately raise the BAL construction standard of the proposed building is based on the ongoing distance to classified vegetation to the north. 	<p>We note that the final BAL construction standards will be confirmed during the building permit process and this is not something that should preclude the granting of a planning permit, noting the site is not within a Bushfire Management Overlay.</p> <p>The applicant is committed to constructing the proposed buildings to the appropriate BAL construction standards and should any amendments be required to the materiality of the buildings, this can be addressed through an amendment to endorsed plans post approval.</p>
<p>It is noted that the proposed building is greater than 500m². FRV advises that, at the time a building permit application is lodged, the Relevant Building Surveyor is to determine the requirements of the NCC in relation to fire services for the proposed building.</p>	<p>Noted. Fire services to the building are to be determined during the building permit application stage.</p>

6. CLOSURE

We trust that the submitted information is satisfactory, and we look forward to the Department of Transport and Planning's favourable consideration of the application. As set out in the supporting material, it is submitted that the application is strategically justified and a permit should issue.

If you have any queries or wish to discuss anything further, please do not hesitate to contact Phillip Rygl via email at phillip.rygl@dartmouthconsulting.com.au or via phone on +61 400 829 235.

Yours sincerely,

Dartmouth Consulting Pty Ltd

Phillip Rygl
Senior Principal – Planning
M: +61 400 829 235
E: Phillip.Rygl@dartmouthconsulting.com.au



Liam Dwyer
Senior Planner
M: +61 423 344 299
E: Liam.Dwyer@dartmouthconsulting.com.au


