

13 April 2024

Zoe Darnos
Planner, Development Approvals and Design
Department of Transport and Planning
8 Nicholson Street, East Melbourne VIC 3000

Via Email Only: zoe.darnos@delwp.vic.gov.au.

Dear Zoe,

RE: PA2302486: 15, 29 and 59 Gibson Street and 445-465 Camp Road, Broadmeadows - Buildings and works associated with an existing Education centre (Penola Christian College) – RFI Response

Echelon Planning acts for Penola Christian College (the School) for planning matters relating to 15, 29 and 59 Gibson Street and 445-465 Camp Road, Broadmeadows (the subject site) and Planning Permit Application 2302486 (the planning application).

The purpose of this letter is to summarise our response to DTP's Request for Further Information (RFI) letter dated 12 December 2023.

Supporting our RFI response are the following enclosed documents:

- A revised Planning Report prepared by Echelon Planning (February 2024).
- Revised architectural plans prepared by McIldowie Partners (February 2024).
- A revised Waste Management Plan prepared by Andrew McIntosh (December 2023).

Application Documents Requested in DTP RFI

DTP's RFI letter requested the following further information:

- 1. Any reference to works associated with the proposed LOTE Centre and Food Tech lab (which Echelon Planning has confirmed does not form part of this permit application), should be removed from the Sustainability Management Plan (see pages 23, 27, 29, 46-49, 50) and from the revised Planning Report (see page 11).**

The Planning Report and Sustainability Management Plan (SMP) have been revised to remove any reference to the LOTE Centre and Food Tech lab.

- 2. An updated Waste Management Plan that removes all references to the LOTE Centre. It is noted that Echelon Planning's response of 29 November 2023 indicates that an amended Waste Management Plan was submitted but that no such revised plan was uploaded on to the Permits Online AppHub portal.**

The Waste Management Plan (WMP) prepared by Leigh Design (19 December 2023) has been revised to remove any reference to the LOTE Centre and Food Tech lab. This has been re-submitted.

3. Amend the architectural plans to provide the following information as follows:

a) Existing and proposed ground levels in AHD (not RL).

The existing and proposed ground levels are shown in AHD on all relevant drawings in the revised architectural package.

b) The siting and overall building height (in AHD) of existing and proposed buildings.

The heights of the proposed buildings are shown in AHD on the elevations supplied with the revised architectural package.

c) Location of all proposed sustainable design measures referred to in the Sustainability Management Plan (including the water sensitive urban design measures, such as the 5kL rainwater harvesting system for re-use for toilet flushing in the Year 10 building and the paving surfaces redirecting stormwater towards permeable garden beds) and a note to confirm whether this will be used for toilets and/or landscape irrigation.

The location of the 13KL rainwater harvesting system has been shown on drawing TPB101, which will be used for toilet flushing in the year 10 centre only. This is described on page 11 of the planning report. The planning report has been revised to remain consistent with the SMP and reference to the paving surfaces has been deleted.

The photovoltaic solar power cell arrangement has been shown on the proposed roof plans of the development. The SMP states at p.13 that this system will not be less than 10kWp.

TP0051 lists the proposed ESD initiatives detailed in the SMP.

d) Separate to the above, the location of any further stormwater treatment or management measures (including maintenance pits) should be set out on the plans.

Stormwater treatment and management measures are shown on drawings TP024, TP025 and TBP101. This includes grated stormwater pits and pipe locations (new and existing). New and existing kerbing is shown in the car park area. TP0025 shows the areas of proposed concrete pavement and the areas of proposed asphalt pavement confirming that the car park area will be appropriately sealed. TBP101 shows a 5,000L underground stormwater tank connected to the Year 10 building.

e) Correct street addresses for properties along Gibson Street.

The plans have been revised to show the correct street addresses for properties along Gibson Street.

f) All further changes to the architectural plans in response to this further RFI should be clouded and revision numbers and dates on any amended sheets updated.

The revisions have been clouded in the architectural drawings and the revision numbers and dates have been provided.

A preliminary assessment of amendments to the application made on 29 November 2023 under section 50 of the Act has revealed that the following (new) further information pursuant to section 54(1) of the Act is required to properly consider your application:

- 1) Title details for 59 Gibson Street, Broadmeadows, more particularly described as Lot 831 on LP59045.**

The title details for 59 Gibson Street had been provided previously which was confirmed by DTP.

- 2) In circumstances where there is proposed to be an increase in the site area of the secondary school, the responsible authority must be satisfied that the number of car parking spaces required under Clause 52.06-5 have been provided (see Clause 52.06-2). On that basis, please confirm the number of employees (full time equivalent) that are onsite at any one time and the number of car spaces currently on-site as well as the additional number of car parking spaces proposed.**

While the proposal seeks to increase the number of car parking spaces at the site from the existing 129 spaces to 166, it is not proposed to increase the number of employees, which currently stands at 180.

The proposal will increase the site area given that it is proposed to use 59 Gibson Street as an access to the school. However, this will clearly not increase the demand for car parking at the site.

The proposal will not increase the existing use by the measure specified in Column C of Table 1 in Clause 52.06-5 for the Secondary School use occurring at the site. This, again because no additional employees are proposed.

Clause 52.06-5 (Number of car parking spaces required under Table 1) states that:

Where an existing use is increased by the measure specified in Column C of Table 1 for that use, the car parking requirement only applies to the increase, provided the existing number of car parking spaces currently being provided in connection with the existing use is not reduced.

There is no rate or measure provided in Clause 52.06 to calculate a site area increase for a secondary school. The sole factor to consider is if employee numbers are proposed to be increased or not. Given that an increase is not proposed, additional car spaces should not be required for the proposal.

Further, it would be excessively onerous to require the school to provide car parking spaces based on a fresh assessment of car parking, given that only a small increase in the site will result from the proposal and the increase is to aid access only and clearly won't increase demand for spaces.

The revised architectural plans submitted in support of the application on 29 November 2023 should be amended to include the following information in respect of that part of the site described as 59 Gibson Street:

- a) an existing conditions and demolition plan that provides location details in respect of any trees proposed to be removed from the subject site (as well as any street tree) proposed to be removed.**

An existing condition and demolition plan have been shown on TP0021, TP0022 and TP0023. This includes details of:

- An existing street tree proposed for removal to facilitate access via 59 Gibson Street
- An existing street pole to be relocated to facilitate access via 59 Gibson Street.
- Existing planted trees within the site indicated for removal (TP0051 shows tree replanting).
- School building, sheds and other structures/landscaping features proposed to be removed.

b) a Proposed Location Plan showing the:

- i. **existing car parking spaces numbered.**
- ii. **configuration and dimensions of all additional car park spaces (also numbered) and access lanes proposed to be developed on the subject site in accordance with the Clause 52.06-8.**
- iii. **proposed location of any boom gate and intercom system on the land at 59 Gibson Street and the distance between this and any neighbouring residential properties.**
- iv. **access/egress points to be used by those parking cars in the proposed north car park area as distinct from buses entering or leaving the area.**
- v. **finished levels of the accessways and proposed north car park area in AHD.**
- vi. **works associated with the delivery of the bus driveway (i.e. removal of street tree/light pole, dimensions of the bus crossover) on part of the subject land.**

b) i Drawing TP0001 shows the existing 129 car spaces numbered. These existing spaces are located to the east of the Performing Art Centre, A Block, M Block, the Library and the Year 12 centre and on 15 Gibson Street.

b) ii Drawings TP0025 and TP0024 include the configuration and dimensions of the 37 additional car park spaces. These spaces have been numbered. Access aisle widths meet clause 52.06.

b) iii The proposed auto-sliding gate with fixed fencing is shown in drawing TP0024.

b) iv The proposed northern car parking spaces will access/egress the site via the main entrance at 29 Gibson Street. TP0003 provides the route that cars will take when entering/exiting the site from 29 Gibson Street.

b) v The finished levels of the accessways and proposed northern car park area are shown in AHD on drawing TP0024 and TP0025.

b) vi The details of works associated with the bus crossover are shown on drawing TP0024. This includes access gates, industrial kerb, isle widths and swept paths, street tree removal and pole relocation, and landscaping.

c) All proposed water sensitive urban design measures proposed to be incorporated in the north car park area and the associated bus driveway.

Stormwater treatment and management measures are shown on drawings TP024 and TP025. This includes grated stormwater pits to prevent litter from entering the stormwater drainage system.

- d) **the Development Summary provided at sheets 2 and 3 of the revised architectural plans submitted on 29 November 2023, indicates that the total site area is 113,732m². The total site area, as well as the subject site as identified on sheets 2 and 3 of the revised architectural plans should be amended to show that the permit application only relates to the land parcels generally described as 29, 59 Gibson Street & 445-465 Camp Road, Broadmeadows.**

The development summary has been revised. Refer to TP0001 and TP0002 for the modified site area. The property at 17 Gibson Street is not included as part of the subject site.

- 3) **An expert report prepared by a suitably qualified traffic engineer assessing:**
- whether a permit is required to reduce the number of car parking spaces required under Clause 52.06-5 (in the event this is necessary).**
 - the bus swept path analysis prepared by Adams Consulting Engineers Pty Ltd (Project: 210445), Dwg no SKC001, Rev 1 dated 20 July 2022. Specifically, DTP would appreciate any recommendations that may serve to address any potential traffic conflicts for other road users (including cars parked along Gibson Street).**
 - the safety and efficiency of the proposed bus driveway and outlining any recommendations in respect of the design of the proposed north car park area, the access/ egress driveway at 59 Gibson Street and the adjoining pedestrian paths (both within the public realm and the subject land).**

A Traffic assessment is not required in pour view because employee numbers are not proposed to be increased and car parking spaces are being increased. This means that in increase in demand for spaces will not result from the proposal. While the site area will increase slightly, this will not increase demand for spaces. The land to be added to the site will be used for access only.

TP0022 details that the existing car spaces at the site will be increased from 129 to 166, meaning that an increase of 37 spaces will result from the proposal.

The swept path analysis is provided at TP0024 and also the Civil Plan prepare by Adams.

- 4) **Confirm whether the proposed access/ egress driveway at 59 Gibson Street is proposed to be used by tradespeople or other visitors to the subject site.**

The proposed entry at 59 Gibson Street will used as a bus access. General staff/visitor access will be via the existing main entrance at 29 Gibson Street.

- 5) **Provide a plan depicting the 2000m² area entered into the STORM Rating tool for the purposes of the rating report included in the Sustainability Management Plan. If this does not include the buildings and works area associated with the proposed north car park area and associated access/ egress driveway at 59 Gibson Street please amend this and submit a plan that shows the area associated with the STORM Rating tool.**

The revised SMP has been updated to now include the northern car park area as part of the STORM assessment.

We look forward to receiving DTP's considerations. If you have any queries, please feel free to give me a call on 0488 373 925.

Kind Regards,



Antony Duffill
Associate Director