



Department of Education

Schools and Regional Services

2 Treasury Place
East Melbourne Victoria 3002
Telephone: 03 9637 2000
DX210083

COR25170807

[REDACTED]
Victorian Planning Authority
Department of Transport and Planning
EastofAberline@transport.vic.gov.au

Dear [REDACTED]

RE: Response to Public Consultation on the East of Aberline Precinct Structure Plan, Development Contributions Plan and Draft Amendment C217 to the Warrnambool Planning Scheme

Thank you for your correspondence of 19 September 2025 providing the Department of Education (DE) with the opportunity to comment on the East of Aberline Precinct Structure Plan (PSP) and accompanying draft amendment to the Warrnambool Planning Scheme as part of the public consultation process. DE also acknowledges the follow-up email dated 7 October 2025, which shared the Preliminary Risk Screen Assessment (PRSA) Report for consideration.

DE understands that the PSP allocates land for one (1) proposed government primary school located on Boiling Down Road, with the site configuration shown in Plan 2 (Place Based Plan) of the PSP (page 16). DE supports the proposed government primary school in this location.

The number of proposed government school sites in the PSP is considered to be appropriate, with this assessment based on projected development within the PSP area to accommodate between 4,000-4,500 new dwellings and support a future population of around 12,000 residents.

The proposed government school site is currently known to DE as '*Russells Creek Proposed P6*'. This interim name can be shared with other stakeholders and can be included in the PSP.

DE notes that it has provided extensive informal input and advice to the Victorian Planning Authority (VPA) during the Agency Validation stage of the precinct structure planning process. DE has reviewed the documentation provided by the VPA, and wishes to make the following comments in relation to the proposed government primary school site (the school site) identified in the PSP.

Contamination

DE understands that the school site is located within an area identified as having high potential for contamination. Based on the PRSA findings and follow-up discussions with the VPA, it is DE's understanding that the school site itself is not affected by the proposed Environmental Audit Overlay (EAO), as identified contamination only partially impacts land outside the school site and the proposed co-located community facility. DE would appreciate VPA's confirmation of this understanding.

Joint indoor stadium

Figure 2 Civic Precinct in Appendix C of the Development Contributions Plan (DCP) shows a 'joint indoor stadium' extending onto the school site. This has not been referenced elsewhere in the DCP or discussed with DE and is in direct conflict with the minimum 3.5ha land requirement for a government primary school. While we support co-location of schools with community facilities and open space, locating a stadium on school land is not appropriate, as DE is not the lead agency for delivery of this facility. Any future joint use would be an operational matter and cannot be resolved at the PSP stage.

Following an email update from VPA on 29 October 2025, it is DE's understanding that the VPA intends to remove the stadium from the school site as shown in Figure 2 Civic Precinct. DE supports VPA's intended approach and requests that the DCP be updated to either remove the stadium from the plan, or alternatively retain the stadium with the following changes:

- Remove the stadium from the school site in Figure 2 Civic Precinct on page 52;
- Remove the term 'joint' in reference to the facility; and
- Clearly reference Warrnambool City Council as the responsible delivery lead.

Crown-land interface

DE notes that the western frontage of the school site abuts a narrow strip of land currently owned by the Department of Energy, Environment and Climate Action (DEECA). DE is concerned about any potential implications this may have for future school development and access. Following an email update from VPA on 29 October 2025, it is DE's understanding that the VPA intends to amend Plan 2 of the PSP to place the local road over the strip of Crown land adjacent to the school site. DE supports VPA's intended approach to amend Plan 2 of the PSP to depict the local road over the strip of Crown land adjoining the proposed government school site.

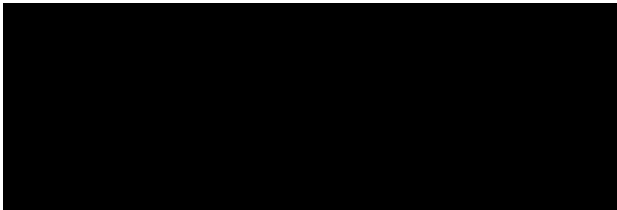
We request that these matters be addressed in the final PSP to ensure the proposed school site is both suitable and safeguarded for its intended purpose.

DE's understanding is that should the amendment proceed to be heard by the VPA Standing Advisory Committee (SAC), that this submission will be referred to the SAC.

DE would appreciate the opportunity to continue working with the VPA on resolving all items raised above and, if relevant, will make a supplementary submission prior to any SAC Hearing to confirm which, if any, of the above issues that DE considers have been subsequently resolved.

If you would like to discuss this matter further, you may contact [REDACTED]
[REDACTED] Infrastructure and Planning Branch, Department of Education on (03) 7022 1374 or
by email: provision.planning@education.vic.gov.au

Yours sincerely



Infrastructure and Planning Branch
School Provision and Establishment Division

05/11/2025