

26 June 2017

Our Ref: MCP 061 GE

Chief Executive Officer
Shire of Kalamunda
PO Box 42
KALAMUNDA WA 6926



Town Planners, Advocates
and Subdivision Designers

ABN 24 044 036 646

Attention: Andrew Fowler-Tutt (Manager Approval Services)

Dear Andrew,

**RE: APPLICATION FOR PLANNING APPROVAL UNDER CLAUSE 8.4 OF SHIRE OF
KALAMUNDA LOCAL PLANNING SCHEME NO. 3
LOT 55 (61) COOLINGA ROAD, LESMURDIE**

We represent the owner of Lot 55 (61) Coolinga Road, Lesmurdie (**subject site**) in making this application for planning approval under Clause 8.4 of the Shire of Kalamunda Local Planning Scheme No. 3 (**LPS3**). This application has been made to the Shire of Kalamunda (**the Shire**) in response to a letter received from the Shire citing unauthorised activities at the subject site.

The subject site contains an existing child-care facility which has been operated by Pachamama Pty Ltd (**Pachamama**) since June 2014. The purpose of this application is to therefore bring the planning approvals into line with the intended operation occurring on the subject site. In summary, this application seeks Shire approval for the following:

- Increase in the total number of children permitted on site at any one time to reflect the current use and consistent with its current licensing;
- Increase in the hours of operation; and
- Additional minor works associated with the existing child-care facility.

It is noted that Pachamama's existing child-care facility operating from the subject site is licensed for a total of 43 children under a Service Approval granted by the Department of Local Government and Communities (**DLGC**) Education and Care Regulatory Unit.

In support of the proposal and supplied to assist the Shire in its consideration is the following:

- Signed Application for Development Approval and Development Application Checklist at **Annexure 1**;
- Set of development plans at **Annexure 2**;
- Parking and Traffic Management Plan Report (**PTMP**) at **Annexure 3**;

125 Hamersley Road Subiaco Western Australia 6008
Telephone (08) 9382 3000 Facsimile (08) 9382 3005

- Letters from neighbouring property owners at **Annexure 4**;
- Bushfire Management Plan and Emergency Evacuation Plan at **Annexure 5**; and
- Response from the Department of Fire and Emergency Services (**DFES**) in support of the Bushfire Management Plan and Emergency Evacuation Plan at **Annexure 6**.

With regard to the planning fees associated with this proposal, as the subject site has existing planning approval for an After School Care Premises (Child Care Premises), the applicable fee relates to the minor works associated with the existing facility which include a shed and timber deck. Those works were estimated as totalling \$14,000.00. Therefore, pursuant to the Shire's Schedule of Fees and Charges, where the cost of development does not exceed \$50,000, the planning fee is \$147.00. Where the development has been carried out, the fee is tripled by way of penalty. Therefore, the required fee of **\$441.00** has been calculated.

Upon receiving this Application for Development Approval, **can you please contact Mr Andrew White on 0418 131 179 for payment of the application fee.**

Background

Planning approval was first granted for a child-care premises at the subject site on 5th December 2013 with conditions limiting a maximum of 10 children at any time and operating times between 3:30pm and 6:00pm, Monday to Friday. The planning approval also included works involving the alteration of the existing building for the purposes of extending the enclosed play area to the east of the building, as well as a patio extension around the north, east and south of the building.

Following planning approval being granted by the Shire, Pachamama applied to the DLGC Education and Care Regulatory Unit for a Service Approval for the child-care premises. On 12 June 2014, DLGC issued a conditional Service Approval allowing for a total of 43 children at the subject site.

Proposal

The Shire's approval is sought under the current proposal to increase the number of school aged children allowed at the subject site from 10 to 43 in line with the existing DLGC Service Approval.

The maximum number of staff on site is five.

It is also proposed that the approved hours of operation be extended to include:

- Monday to Friday (excluding public holidays) from 6:30am – 8:30am (Before School Care);
- 2:30pm – 6:30pm (After School Care); and
- 7:00am – 6:30pm (Vacation Care).

In addition, other minor works have been carried out since the commencement of the centre including:

- Construction of a shed structure in the north-west corner of the property; and
- Construction of a timber deck in the external play area to the north of the existing building.

The Shire's approval of these additional minor works, as outlined on the Site Plan contained within the set of plans at **Attachment 2**, is sought in addition to the amendments to the existing use.

Planning Framework

Shire of Kalamunda Local Planning Scheme No. 3

Clause 8.4 of LPS3 outlines the following provisions for unauthorised existing developments:

8.4 UNAUTHORISED EXISTING DEVELOPMENTS

8.4.1 The local government may grant planning approval to a use or development already commenced or carried out regardless of when it was commenced or carried out, if the development conforms to the provisions of the Scheme.

8.4.2 Development which was unlawfully commenced is not rendered lawful by the occurrence of any subsequent event except the granting of planning approval and the continuation of the development unlawfully commenced is taken to be lawful upon the granting of planning approval.

This application for planning approval has been submitted pursuant to Clause 8.4 of LPS3 and its compliance with the provisions of the relevant planning framework is outlined for the Shire's consideration in the sections to follow.

Relevant Scheme Provisions

The aims of the Shire's LPS3 are contained at Clause 1.6, with the relevant aims including:

- (i) to zone the Scheme area for the purposes described in the Scheme so as to strategically promote the orderly and proper development of land by making suitable provisions for the use of land within the Scheme area;*
- (ii) to secure the amenity, health and convenience of the Scheme area and the residents thereof;*

The subject site is zoned Residential (R5) under the Shire's LPS3. Within the Residential zone a "Child Care Premises" is an "A" use meaning that:

Means that the use is not permitted unless the Council has granted planning approval after giving notice in accordance with Clause 9.4 (Advertise).

The subject site has an existing approval for a Child Care Premises use.

The proposal involves the continuation of the approved Child Care Premises use, but with an increase in the approved number of children and hours of operation.

Parking Provisions

Clause 5.7.1 of LPS3 requires that a person must not use or develop land unless car parking bays as specified in Table 3 are provided. Clause 5.7.2 provides further clarification of parking rates as follows:

5.7.2 The local government may apply at its discretion, a greater or lesser requirement for car parking than that stipulated as the minimum requirement in Table 3, if in its opinion the proposed use is likely to demand a greater or lesser need for car parking bays having due regard to the scale and nature of the intended use or uses.

Table 3 requires the following car parking standards for a Child Care Centre/Day Centre use:

1 bay per staff member, plus 1 bay for every 10 children allowed under the approval.

Table A (overleaf) outlines the technical parking requirements for the two existing Pachamama facilities, with the subject site being shown underlined.

Notwithstanding the technical shortfall, parking has been considered in the PTMP included at **Annexure 3**. As noted in the PTMP 36 Marri Crescent currently contains 13 bays.

As noted in the PTMP, 61 Coolinga Road (subject site) currently has two off street parking areas available, both of which are accessed from Gladys Road. The northern parking area is designated as providing parking for staff vehicles only. The southern parking area is designated for customer parking, but is also able to accommodate some of the centre's fleet of shuttle buses.

Whilst it is noted that the subject site also accommodates bus parking, the technical parking capacity of 16 bays is achievable. Therefore, with a total of 29 bays technically available across the two sites, the proposal is capable of meeting the requirements of LPS3. Option two of Appendix D of the PTMP demonstrates how the parking arrangement on the subject site can accommodate a greater number of parked vehicles in tandem arrangement when utilised as staff parking.

TABLE A: PARKING REQUIREMENTS FOR EXISTING FACILITIES				
Service	Room	No. of Educators	No. of Children	Car Parking Required
Pachamama Activity Centre (61 Coolinga Road)	General	5 (5 bays)	43 (4 bays)	5 + 4 (= 9 bays)
				Total = 9 bays
Pachamama Early Education and Childcare (36 Marri Crescent)	Nursery Room	3 (3 bays)	12 (1 bay)	3 + 1 (= 4 bays)
	Toddler Room	3 (3 bays)	15 (2 bays)	3 + 2 (= 5 bays)
	Jr Kindy Room	2 (2 bays)	20 (2 bays)	2 + 2 (= 4 bays)
	Kindy Room	2 (2 bays)	22 (2 bays)	2 + 2 (= 4 bays)
		1 (floating) (1 bay)		1 bay
		1 (MGR) (1 bay)		1 bay
				Total = 19 bays
Parking Requirement		17 (for educators)	11 (for parents)	28 bays

Finally, **Table A** demonstrates that there is a need to provide space on the subject site for staff parking associated with the 36 Marri Road facility. As noted in the summary and conclusions of the PTMP, based on the parking and traffic surveys undertaken, the parking management arrangements already implemented by Pachamama (as contained at Appendix B of the PTMP) have been assessed as being well managed and adequate for the staffing levels and the number of children accommodated.

Amenity Considerations

As shown in **Figure 1** below, the existing centre on the subject site is currently located directly adjacent to two existing residential properties, being 4 Gladys Road and 43 Welshpool Road East. It is also noted that the neighbouring property at 59 Coolinga Road has also recently been purchased by Pachamama, but before that time was occupied as a residential property.

As part of a separate proposal for 59 Coolinga Road, those neighbouring landowners provided comment in respect to that proposal. Based on those experiences with the existing centre (at 61 Coolinga Road), the neighbouring landowners included comment on the existing centre the subject of this application. Those letters are included at **Annexure 4** and verify in summary that:

- Those properties have never been subject of negative noise disturbance from the existing facility;
- Residents have never experienced problems with traffic or parking; and

- The visual presentation of the subject site is maintained to a high level and improves the overall amenity of the area.



Figure 1 – Neighbouring Properties

Planning and Development (Local Planning Schemes) Regulations 2015

In the determination of a planning application, Council must have due regard to any relevant matters listed in Clause 67 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015 (the Regulations)* which automatically form part of LPS3. The matters relevant to this proposal include:

Provision:	Response:
(a) the aims and provisions of this Scheme and any other local planning scheme operating within the Scheme area;	The proposal is consistent of the aims and provisions of LPS3 as it provides for a land use which is permissible within the Residential zone on the basis that it will protect the amenity of surrounding residential land uses. On the basis that the proposal is retrospective, the proposed increase in hours of operation and capacity of the centre has already been tested with regard to its operational ability to manage off-site impacts. The proposal is therefore highly appropriate in this residential setting and will continue to function at the highest level of management to ensure the ongoing protection of surrounding residential amenity.
(b) the requirements of orderly and proper planning including any proposed local planning scheme or amendment to this Scheme that has been advertised under the <i>Planning and Development (Local Planning Schemes) Regulations</i>	The land use is allowable under the Shire's Scheme and one which has been approved previously by the Shire. Due consideration with regard to the nature of the proposal and its likely impacts on the amenity of the location is required based on the proposed modifications to hours of operations and capacity. In our view, approval of the proposal would be consistent with the orderly and proper planning of the locality as it is a proposal that can be contemplated on this site with no

2015 or any other proposed planning instrument that the local government is seriously considering adopting or approving;	impacts on immediately adjoining or adjacent landowners. It has been demonstrated that the facility has operated with no amenity impacts on adjoining and surrounding neighbours and the strategic location of the facility being grouped with other commercial uses with good access to the road network is directly reflective of the intent of the WAPC's Planning Bulletin 72/2009 Child Care Centres (the Planning Bulletin) in planning for the location of childcare centres.
(c) any approved State planning policy;	The proposal has been assessed against the criteria of State Planning Policy 3.7 – Planning for Bushfire Prone Areas (SPP3.7) and the associated Guidelines for Planning in Bushfire Prone Areas (the Guidelines) and has been found to be acceptable based upon the implementation of the measures contained within the attached Bushfire Management Plan and Evacuation Plan.
(e) any policy of the Commission;	The proposal has been assessed against the recommendations of the Planning Bulletin and is considered to be consistent with the guidance contained within that document.
(m) the compatibility of the development with its setting including the relationship of the development to development on adjoining land or on other land in the locality including, but not limited to, the likely effect of the height, bulk, scale, orientation and appearance of the development;	The development is highly compatible to this setting being: • Located on a distributor road (Gladys Road), and in proximity to Welshpool Road East, which provide for a high level of connectivity and access within Lesmurdie; • Located close to other commercial land uses (child care, medical, service station); • Located in a low density residential environment which provides for greater opportunities for location of active outdoor spaces to mitigate against noise impacts, perceived or otherwise; and • Located on the downward slope of Coolinga Road so as to avoid any direct disruption to the visual presentation of the streetscape (notwithstanding the minimal improvements proposed as part of the operation).
(n) the amenity of the locality including the following — (i) environmental impacts of the development; (ii) the character of the locality; (iii) social impacts of the development;	As noted previously, the amenity of the location will not be affected as a result of the proposal given the management measures proposed as part of this application are pre-existing and the operation has continued without any objection received from the public. Further, the use provides an important service to both local residents and the community where there is high demand for the facility. The effect of not proceeding with the development is that parents would most likely need to travel outside the immediate locality to centres that provide that service elsewhere. That is not considered to be orderly and proper planning.
(q) the suitability of the land for the development taking into account the possible risk of bush fire;	As noted above, the proposal has been assessed against the criteria of State Planning Policy 3.7 – Planning for Bushfire Prone Areas (SPP3.7) and the associated Guidelines for Planning in Bushfire Prone Areas (the Guidelines) and has been found to be acceptable based upon the implementation of the measures

	contained within the attached Bushfire Management Plan and Evacuation Plan.
(s) the adequacy of – (i) the proposed means of access to and egress from the site; and (ii) arrangements for the loading, unloading, manoeuvring and parking of vehicles;	Parking and access have been demonstrated to be acceptable through the additional investigations undertaken by the operator as part of this application.
(t) The amount of traffic likely to be generated by the proposal, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety;	Similarly, it has been demonstrated by the Applicant's engineers that traffic generated by the proposal will have a minimal impact on the local road network.
(w) the history of the site where the development is to be located.	Importantly, the adjoining residents to this existing child care facility have provided letters in support of the previous proposal on the neighbouring site to the east (59 Coolinga Road) which demonstrated that the facility at the subject site has operated to maintain high levels of residential amenity for its neighbours. The proposal will function under the same management regime.
(x) the impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals;	When considering both existing childcare facilities operated by Pachamama, the facility at 36 Marri Crescent services 150 families, 79% of which reside or attend schools in the Shire. The facility is at full capacity five days of the week. The facility at 61 Coolinga Road (the subject of this application) services 157 families, 100% of which reside or attend schools in the Shire. The after school care service offered at the facility is at full capacity Monday to Thursday and at 79% capacity on Fridays. These numbers demonstrate the high demand for these types of facilities in the locality for the local community. The discontinuation of either facility would negatively affect the community which relies on their continued operations.

Planning Bulletin 72/2009 Child Care Centres

The WAPC has developed a set of Planning Bulletins to provide advice on legislation, planning practice, subdivision and development control, and policy positions of the WAPC.

The provisions of Planning Bulletin 72/2009 - Child Care Centres (**the Planning Bulletin**) provide guidance to decision makers in exercising discretion in determining planning applications and should therefore not be applied as if it were policy.

However, the provisions of the Planning Bulletin do assist in planning for new childcare facilities and have been responded to in the table below:

Provision:	Response:
3.3 Location of child care centres a) distributed strategically to provide the maximum benefit to the community it serves; b) within easy walking distance or part of appropriate commercial, recreation or community nodes and education facilities; c) located in areas where adjoining uses are compatible with a child care centre (includes considering all permissible uses under the zoning of adjoining properties); d) serviced by public transport (where available); e) considered suitable from a traffic engineering/safety point of view; and f) of sufficient size and dimension to accommodate the development without affecting the amenity of the area.	- The existing school aged childcare centre draws upon the local catchment of the primary schools in proximity to the subject site. The location of the centre on Gladys Road, which connects to Welshpool Road East, is strategic and makes it convenient for children to be picked up from distributor roads. - The subject site is located close to other commercial land uses (child care, medical, service station). - The existing centre is located within a residential zone within which a child care centre land use is permitted subject to Council exercising discretion and advertising the proposal. - The subject site is located close to a distributor road (Gladys Road), and in proximity to Welshpool Road East, which provide for a high level of connectivity and access within Lesmurdie. - The proposal has been assessed from a traffic safety point of view and has been determined as acceptable on the road network. - The size of the subject site provides for greater opportunities for location of active outdoor spaces to mitigate against noise impacts, perceived or otherwise.
3.4 Site characteristics - Sites in a residential area should be of regular shape and greater than 1000 sqm. - The topography of the site and surrounds should also be considered as steep slopes may affect access to the facility, noise transfer and methods of noise mitigation. - The licence to operate a child care centre, issued under the regulations (Child Care Services Act 2007) limits the number of children the centre can accommodate.	- The subject site is 1,755m² in area. - The subject site slopes from north to south which means that the face of the slope is orientated towards Welshpool Road East which means that the area is already subject to a higher level of background noise in this location. - As noted above, the current DLGC Service Approval permits 43 children at the subject site.
3.5 Design of centres	

• The visual appearance of the child care centre, should be in accordance with the local planning scheme and/or reflect the character of the area, enhance its amenity and be considered appropriate for regular use by children. • Parking areas should be located in front of the building. • The minimum parking requirement for a child care centre, including staff parking, will be one space per five children. The number of parking bays may be varied by the local government given the specific provisions of the local planning scheme. • Outdoor play areas should be in a safe location on the site, and away from any adjoining noise-sensitive premises, such as dwellings and nursing homes.	• The existing childcare centre is located within a converted dwelling which has been extensively upgraded to provide for a safe, functional and attractive environment for its users. Within the external spaces, Pachamama's focus on the natural environment and nature play has resulted in a highly functional landscaped setting which has maintained the hills amenity. • All parking areas are located at the front of the existing building. • The subject site contains space for up to 17 parking bays. At a rate of one bay per five children, a total of nine bays are required pursuant to the Planning Bulletin. Under LPS3, childcare centres require one bay per staff member, plus one bay for every 10 children. With a maximum of five potential staff members and 43 children on site, a total of nine spaces are required. Regardless of the ratio, the parking supplied on-site complies. • The outdoor play areas are located to the north and east of the existing building on-site. The topography of the subject site which slopes downward from the north provides for a natural noise mitigating function to dwellings to the north of Coolinga Road. To the east, the operator has purchased the adjoining dwelling at 59 Coolinga Road. Therefore, there is no noise impacts associated with this adjoining dwelling. The use of the external space to the south of the site is for passive purposes associated with the wetland and there is therefore no direct play area interface with the neighbouring dwelling to the south.
3.6 Traffic impacts A traffic impact statement/assessment should be required for the development of a child care centre.	The traffic assessment included as part of this application has demonstrated that traffic, parking and associated established management practices are operating at an acceptable level.
3.7 Noise impacts • A noise impact assessment may be required for the development of a child care centre.	• As part of previous community consultation undertaken for the proposed childcare centre extension at 59 Coolinga Road to the east of the subject site, immediately adjoining neighbours to the existing facilities provided submissions in support of the existing and proposed operations based on the negligible levels of noise and traffic disruptions resulting from the existing facilities. A noise assessment has not been included as part of this planning application on the basis of the positive support received by directly adjoining neighbours.

- Where a child care centre is located adjacent to a noise sensitive use, such as houses, retirement villages and nursing homes, the noise-generating activities of the child care centre, such as the outdoor play areas, parking areas and any plant and equipment, are to be located away from the noise-sensitive use. - As a general rule, the hours of operation of a child care centre should be limited to between the hours of 7 am and 7 pm weekdays and on Saturdays.	- As noted above, the passive areas of the outdoor areas are located on the southern side of the subject site adjacent to the adjoining neighbours. The main external play spaces are located to the north of the site along the northern and north-eastern boundaries which benefit from the elevated embankment provided by Coolunga Road to the north. - It is proposed that the school-aged facility will operate Monday to Friday (excluding public holidays) from 6:30am – 8:30am (Before School Care); 2:30pm – 6:30pm (After School Care); and 7:00am – 6:30pm (Vacation Care). Pachamama's records indicate that approximately three to five families (around 8-10%) require the service to be open at 6:30am due to working commitments in the Perth CBD, or shift work. While this demand is not substantial, Pachamama recognises that living in the hills localities does involve travel time not incurred by families residing in the central metropolitan locations and therefore is a required service of some families in the Shire. In addition, based on the support of the immediate neighbours, it is considered that the 6:30am start time is acceptable given the circumstances of the site.
3.8 Need for child care centres If there is a demonstrable impact on the amenity of an area or the level of service enjoyed by a community, then this is a relevant local planning consideration.	The existing school aged childcare centre is currently at capacity which demonstrates that there is a legitimate need for this service in this locality for the local community.

State Planning Policy 3.7 – Planning in Bushfire Prone Areas

State Planning Policy 3.7: Planning for Bushfire Prone Areas (**SPP3.7**) and the Guidelines for Planning in Bushfire Prone Areas (**the Guidelines**) were released and took effect on 7 December 2015. SPP 3.7 provides the foundation for land use planning decisions in designated bushfire prone areas. The subject site is within a designated bushfire prone area as designated by the Fire and Emergency Services (**FES**) Commissioner.

Clause 6.2(a) of SPP 3.7 provides as follows:

- a) *Strategic planning proposals, subdivision and development applications within designated bushfire prone areas relating to land that has or will have a Bushfire Hazard Level (BHL) above low and/or where a Bushfire Attack Level (BAL) rating above BAL-LOW apply, are to comply with these policy measures.*

Further, Clause 6.5 specifies that:

Any development application to which policy measure 6.2 applies is to be accompanied by the following information in accordance with the Guidelines: (i) a BAL assessment. BAL assessments should be prepared by an accredited Level 1 BAL Assessor or a Bushfire Planning Practitioner unless otherwise exempted in the Guidelines; or

- (ii) a BAL Contour Map that has been prepared for an approved subdivision clearly showing the indicative acceptable BAL rating across the subject site, in accordance with the Guidelines. BAL Contour Maps should be prepared by an accredited Bushfire Planning Practitioner*
 - a) the identification of any bushfire hazard issues arising from the BAL Contour Map or the BAL assessment; and*
 - b) an assessment against the bushfire protection criteria requirements contained within the Guidelines demonstrating compliance within the boundary of the development site.*

This information can be provided in the form of a Bushfire Management Plan or an amended Bushfire Management Plan where one has been previously endorsed.

In addition, Clause 6.6 deals with 6.6 Vulnerable or high-risk land uses as follows:

6.6.1 In areas where BAL-12.5 to BAL-29 applies

Subdivision and development applications for vulnerable or high-risk land uses in areas between BAL-12.5 to BAL-29 will not be supported unless they are accompanied by a Bushfire Management Plan jointly endorsed by the relevant local government and the State authority for emergency services. Subdivision applications should make provision for emergency evacuation. Development applications should include an emergency evacuation plan for proposed occupants and/or a risk management plan for any flammable on-site hazards.

The Guidelines describe vulnerable land uses at Part 5.5 and include child care centres. Accordingly a Bushfire Management Plan and Emergency Evacuation Plan has been prepared as part of this report and are included at **Annexure 5**. A copy of the response from the DFES which supports the outcomes of the Bushfire Management Plan and Emergency Evacuation Plan is included at **Annexure 6**.

Discussion

Having regard to the aforementioned planning framework, the proposal is considered to be appropriate and of a scale that is capable of approval in this location. The traffic management measures outlined in the attached Parking and Traffic Management Plan

Report (refer **Annexure 3**) have been derived from Pachamama's adopted parking management practices and will therefore continue to be applied as part of its daily operations. The traffic report has also determined that the existing centre is operating in compliance with the management measures established by Pachamama.

More broadly, we note that the existing traffic impacts were assessed as part of a separate planning application for 59 Coolinga Road (which included consideration of existing traffic from the existing centre at 61 Coolinga Road) which was found to be acceptable having regard to the level of service on nearby intersections and associated queuing at the intersection of Welshpool Road East and Gladys Road during peak periods.

The immediate neighbours are in full support of the existing operations and have provided letters in support of the service to the Shire. This suggests that any noise impacts are already being appropriately managed by Pachamama within the hours for which they are seeking approval under this application. For this reason, a noise assessment has not been provided as part of this application as we consider that assessment of the use is capable of being made with the material provided.

As outlined in our previous correspondence, the centre holds the relevant approvals under the *Education and Care Services National Law (Western Australia)* and associated *Education and Care Services National Regulations* for Before School Care, After School Care and Vacation Care. The service has also recently been assessed as exceeding all Quality Areas of the National Quality Standards as referred to in the aforementioned legislation and regulations.

Conclusion

The Shire's support is therefore sought for the approval of the existing school-aged childcare facility at the subject site which has demonstrated the highest level of service by the relevant regulatory authorities. Based on its existing operations, it has been demonstrated that noise, traffic and parking issues are already appropriately managed on site and will continue to be based on the formalisation of those measures in the approved documentation.

We look forward to the Shire's positive consideration of this application, however in the meantime should you require any further information, please do not hesitate to contact our office on 9382 3000.

Yours sincerely

ALLERDING AND ASSOCIATES



TOM HOCKLEY
ASSOCIATE

Cc. Client