

The Principal Registrar  
Planning & Environment List  
Victoria Civil and Administrative Tribunal (VCAT)  
55 King Street  
MELBOURNE VIC 3000

Lodged Electronically

October 18, 2024

Dear Sir/Madam,

**Re: 1161 BURWOOD HWY UPPER FENTREE GULLY  
PLANNING PERMIT NO. P/2020/6347  
AMENDMENT TO PERMIT UNDER SECTION 87A of the ACT**

## 1. INTRODUCTION

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Ricardo Energy Environment & Planning (hereafter Ricardo) acts on behalf of TAG-Ferntree Gully Pty Ltd (the **Applicant**) in respect to the property at 1161 Burwood Highway Upper Ferntree Gully (the **Land**) and Permit P/2020/6347 (the **Permit**).

Permit P/2020/6347 was issued at the direction of VCAT in TAG-Ferntree Gully Pty Ltd v Knox CC [2022] VCAT 1469.

The Permit was issued on 22 December 2022 and authorises '*Use and development of the site for a childcare centre and a medical centre, the consolidation of 5 lots, to undertake excavation works, display advertising signs, create or alter access to a road in a Transport Zone 2 and removal of vegetation*'. The address of the land in the issued Permit is 1157-1165 Burwood Highway Upper Ferntree Gully. We confirm that an application for extend the permit has been lodged with Knox City Council to allow an extension to the commencement date of the Permit.

The Applicant and owner of the land concerned, TAG-Ferntree Gully Pty Ltd, is making this application for amendment to the permit pursuant to Section 87A of the Planning & Environment Act 1987 (the Act). This section of the Act includes:

### **87A Cancellation or amendment of permit issued at direction of Tribunal**

- (1) *In addition to the powers conferred by section 87, the Tribunal may cancel or amend a permit that has been issued at its direction if it considers it appropriate to do so.*
- (2) *The Tribunal may only cancel or amend a permit under this section at the request of-*
  - (a) *the owner or occupier of the land concerned; or*
  - (b) *any person who is entitled to use or develop the land concerned.*

The application for amendment to the Permit is made to:

- amend the address of the land to which the permit applies to 1161 Burwood Highway Upper Ferntree Gully as the land has since been consolidated from five (5) lots to one (1) lot and has a new address.
- amend the preamble to the permit to remove reference to '*and a medical centre*' and remove reference to '*the consolidation of 5 lots*'
- amend condition 32 to allow for an increase in the maximum number of children in the childcare centre from 100 to 120 at any one time.
- delete conditions 34 and 35 which relate to the medical centre use.

- consider amendments made to the plans to be endorsed which relate to the removal of the previously approved medical centre use and associated buildings and works and changes to the childcare centre to suit the requirements of the tenant.

The amendments are being sought as the previously considered and approved medical centre is no longer being pursued by the Applicant and also to meet the specific design and layout requirements of the childcare centre tenant.

The Applicant is also seeking to amend Condition 32 to allow the maximum number of children cared for in the childcare centre to not exceed 120 at any one time. Condition 32 currently limits the total number of children to 100 at any one time. This change is being made as there is now additional room provided in the childcare building given the removal of the medical centre use and there is sufficient car parking provided for in the car parking area to meet the increase in children numbers.

In order to facilitate the changes, the Permit is required to be amended to remove reference to the medical centre from the permit including conditions, and to allow amendments to the plans to remove all reference to the medical centre use and associated buildings and works. The Application also seeks to remove reference to 'consolidation of 5 lots' from the preamble as the consolidation of Lots has already been undertaken under instrument PC377578X on the 25 July 2024.

The Amendment is accompanied by the following supporting material and information:

1. Updated architectural plans, prepared by FD Architects Pty Ltd, Sheets TP02, TP03.1, TP03.2, TP03.3, TP04.1, TP5.1, TP05.2, TP05.3, TP06, TP07, TP08, TP09 marked as Revision 8 dated 7 October 2024. The plans have been prepared to address the Condition 1 requirements of the Permit and to include changes to the layout of the site to reflect the amendments identified above.
2. Civil and drainage design plans, prepared by MRM Structure Civil Design, sheets C001-C008 Revision P1 dated 12 August 2024, to satisfy Condition 7 of the Permit.
3. Landscape plan, prepared by Stratis Landscape Architects Pty Ltd, Drawing L700, L701, L702, L703 & L710, dated 10 July 2024, to satisfy Condition 8 of the Permit.
4. Sustainable Management Plan, prepared by Keystone Alliance Sustainability Solutions Pty Ltd, dated June 2024, to satisfy Condition 11 of the Permit.
5. Tree Management Plan (TMP), prepared by Landscapes by Design, dated 3 September 2024, to satisfy Condition 14 of the Permit.
6. Tree Protection Plan, prepared by Landscapes by Design, dated 22 August 2024, to satisfy Condition 15 of the Permit.
7. Ecological Management Report, prepared by Ecology & Heritage Partners Pty Ltd, dated August 2024, to satisfy Condition 19 of the Permit.
8. Pedestrian and Road Safety Audit, prepared by SALT, to satisfy Condition 31 of the Permit.
9. Fire Safety Access Design Review Report, prepared by DDEG (Access) Pty Ltd, dated 21 June 2024.
10. Updated Bushfire Management Plan, prepared by Terramatrix, Version 2.5 dated 17 June 2024 to replace the previous Bushfire Management Plan dated September 2022 as referenced in Condition 37 of the Permit.
11. Functional Layout Plan, prepared by Stantec Drawing 304401565-01-F3, to satisfy Condition 39 of the Permit.
12. Section plans for Burwood Highway including civil works, prepared by Stantec Drawings STN-00-22-DR-CI501200, STN-00-22-DR-CI501201, STN-00-22-DR-CI501250 and STN-00-22-DR-CI501251.
13. Road Safety Audit Report, prepared by Road Safety Audits dated 15 July 2024, to satisfy Condition 41 of the Permit.
14. Waste Management Plan, prepared by Keystone Alliance Sustainability Solutions Pty Ltd, dated July 2024, to satisfy Condition 45 of the Permit.
15. Acoustic Assessment, undertaken by Acoustic Logic, dated 30 May 2024, to satisfy Condition 56 of the Permit.
16. Current Certificate of Title.

## 2. PROPOSED CHANGES TO THE PERMIT

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The following amendments to the Permit are being applied for:

### 2.1 ADDRESS OF THE LAND.

The address of the land to which the Permit applies is to be amended to 1161 Burwood Highway Upper Ferntree Gully, known as Land in Plan of Consolidation 377578X.

The Permit at the time of issue constituted five Lots and was noted as 1157-1165 Burwood Highway Upper Ferntree Gully. The five previous Lots have been since consolidated in Plan of Consolidation 377578 effective from 25 July 2024 and a new address has been issued.

### 2.2 AMENDMENT TO PREAMBLE.

The preamble to the Permit currently reads:

*'Use and development of the site for a childcare centre and a medical centre, the consolidation of 5 lots, to undertake excavation works, display advertising signs, create or alter access to a road in a Transport Zone 2 and removal of vegetation'*

The application seeks to amend the preamble to the Permit to the following to reflect the removal of the medical centre and to remove reference to consolidation of 5 lots as this has already been acted on. The proposed amended preamble is as follows:

*'Use and development of the site for a childcare centre, to undertake excavation works, display advertising signs, create or alter access to a road in a Transport Zone 2 and removal of vegetation'*

### 2.3 AMENDMENT TO CONDITION 32.

The Applicant seeks to amend Condition 32 to allow for an increase in the maximum number of children in the childcare centre from 100 to 120 at any one time.

The current condition reads:

32. *The maximum number of children cared for in the centre must not exceed 100 children at any one time.*

It is proposed to increase the total number of children allowed in the childcare centre to 120, representing an increase of 20 children. Further considerations relating to this change are provided at Section 5 of this report.

### 2.4 DELETION OF CONDITIONS 34 AND 35.

The Applicant seeks the deletion of Conditions 34 and 35 as they relate to the use and operational requirements associated with the medical centre which is no longer being pursued and the Conditions are therefore redundant.

The current conditions read:

34. *No more than four practitioners must be operating from the medical centre at any one time unless with the written consent of the Responsible Authority.*

35. *Except with the written consent of the Responsible Authority, the medical centre use allowed by this permit must operate only between the following hours:*

*Monday to Friday 7.00am to 8.00pm.*

*Saturday and Sunday 8.00am to 5.00pm.*

## 3. PROPOSED CHANGES TO PLANS

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The following changes are proposed to the plans to enable the removal of the medical centre use and to facilitate the increase in childcare numbers, as shown in plans prepared by FD Architects Pty Ltd TP02, TP03.1, TP03.2, TP03.3, TP04.1, TP5.1, TP05.2, TP05.3, TP06, TP07, TP08, TP09 marked as Revision 8 dated 7 October 2024



The changes to the plans are compared to the VCAT considered plans and those referenced in Condition 1 of the Permit being TP02, TP03.1 & 3.1, TP04.1 & 04.2, TP05.1, 05.2, & 05.3, all revision 6, dated 29/11/22 and TP06 marked as Revision 4 dated 20/09/2022 as prepared by FD Architects Pty Ltd.

### Car Park Level

The proposed car parking level as depicted on TP03.1 is to be reduced to remove the car parking spaces associated with the previous medical centre use. The considered VCAT Plans included a total of 34 car parking spaces within the car park level including 27 allocated for the childcare centre and 7 allocated for the medical centre.

The medical centre car parking spaces were allocated within the western side of the car park level with a separate stair and lift provided to the previously proposed medical centre above as per the figure below.

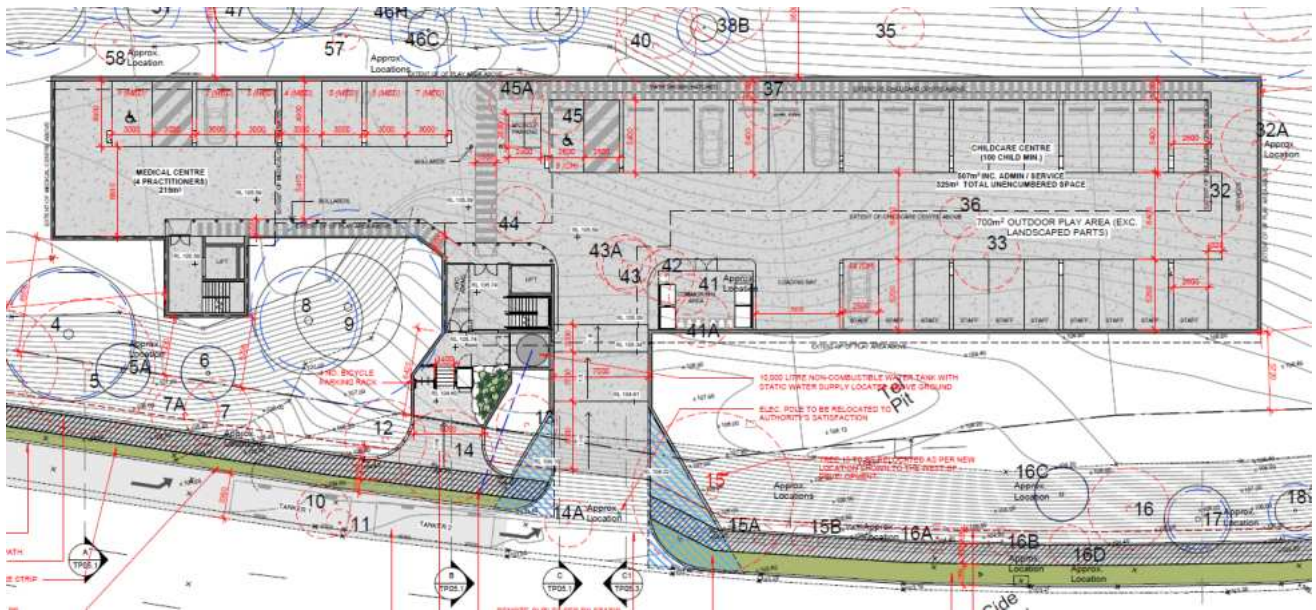


Figure 1: Car parking layout as per VCAT considered plan TP03.1 Revision 6 dated 29 November 2022.

The amended plans under this application remove the medical centre car parking area and the associated 7 car parking spaces, lift and stair and turning around area west of the main entry. The location of the car park entry, stairs and slip lane do not change from the considered VCAT plans.

The changes are depicted in TP03.1 Revision 8 dated 07 October 2024 and are shown below, resulting in less excavation required across this part of the site.

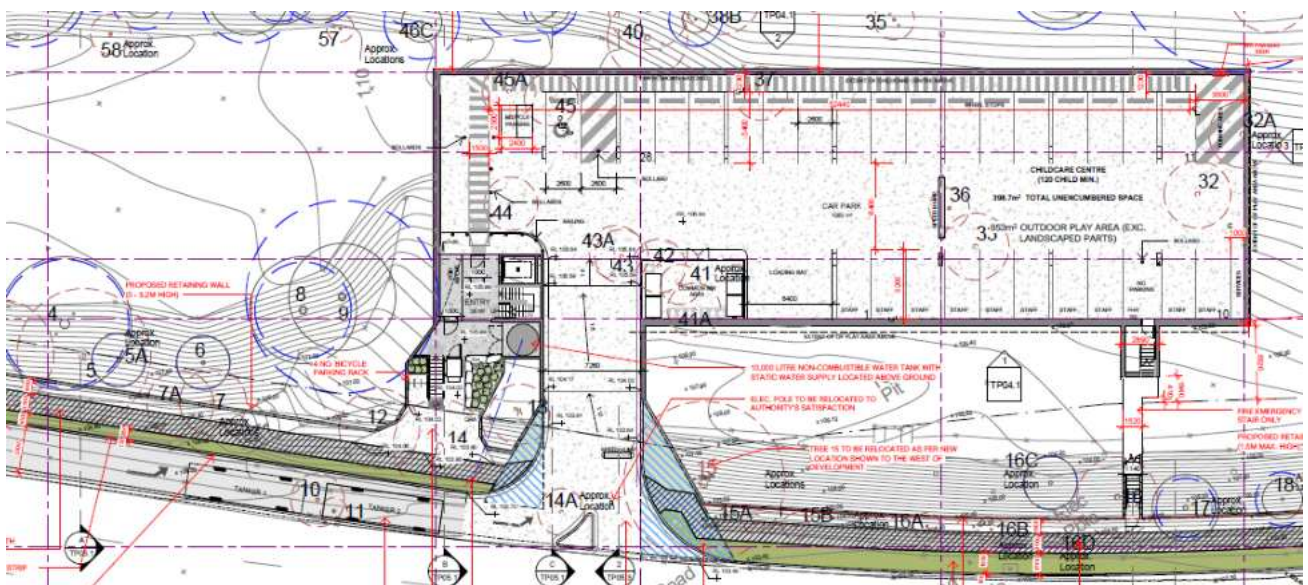


Figure 2: Proposed amended car parking layout as per TP03.1 Revision 8 dated 11 October 2024.



The set back of the car parking level from the east and north boundary has not changed with a minor reduction in the setback of the car park at the south-eastern corner to the south boundary from 5.72m to 5.52m. This level is situated below natural ground level and will not be visible from Burwood Highway.

Other changes included on this plan include:

- Internal reconfiguration of the car parking area to accommodate access to a new fire escape stair in the south-eastern corner (between car parking spaces 8 and 9), increase in the width of the internal loading bay from 6.22m to 6.4m and allowance for a turn around area at the north-eastern corner.
- Introduction of a fire escape stair at the eastern end of the building leading to the footpath along Burwood Highway and up to the childcare centre. This fire escape has been identified as required during detailed fire engineering assessments undertaken by DDEG (Fire). The fire escape is in the form of 1.5m wide stairs that will provide a secondary fire escape for the childcare centre. The stairs will include a gate the street level and will only be used for fire escape purposes. The stairs do not impact on the retention of any existing vegetation.
- The finished floor level of the car park has increased from RL105.59 to RL 105.84 (0.25m increase) to facilitate the ramp grades and vehicle and pedestrian entrance from Burwood Highway.
- The entrance ramp width has increased from 7.0m to 7.26m to improve vehicular access.

### Child Care Level

The proposed childcare level is to be amended primarily to remove the previous 215sqm medical centre at the western end of the building with this area to be replaced with an outdoor play area associated with the childcare centre. Changes are also being made to the childcare centre layout of rooms and play areas. The changes to the layout reflect the specific requirements of the tenant for the childcare centre.

The VCAT considered plans are shown below in Figure 3.

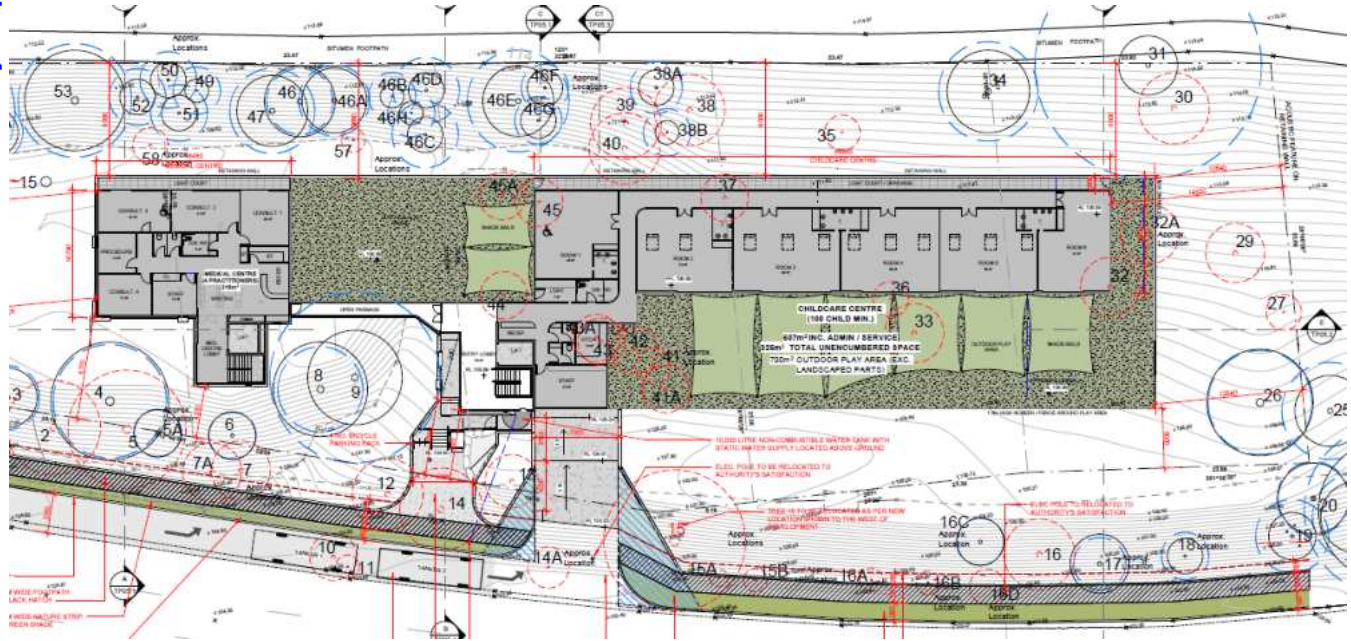


Figure 3: Childcare level layout as per VCAT considered plan TP03.2 Revision 6 dated 29 November 2022.

The VCAT considered plans included the childcare centre building setback towards the northern section of the building footprint with outdoor play areas located on the southern side and to the west. The medical centre included a built form at the western edge of the building with a stair case and entry siting forward of the main building.

The architects have outlined the previous considered building footprint over the amended design for ease of assessment and to understand the siting and built form changes proposed.

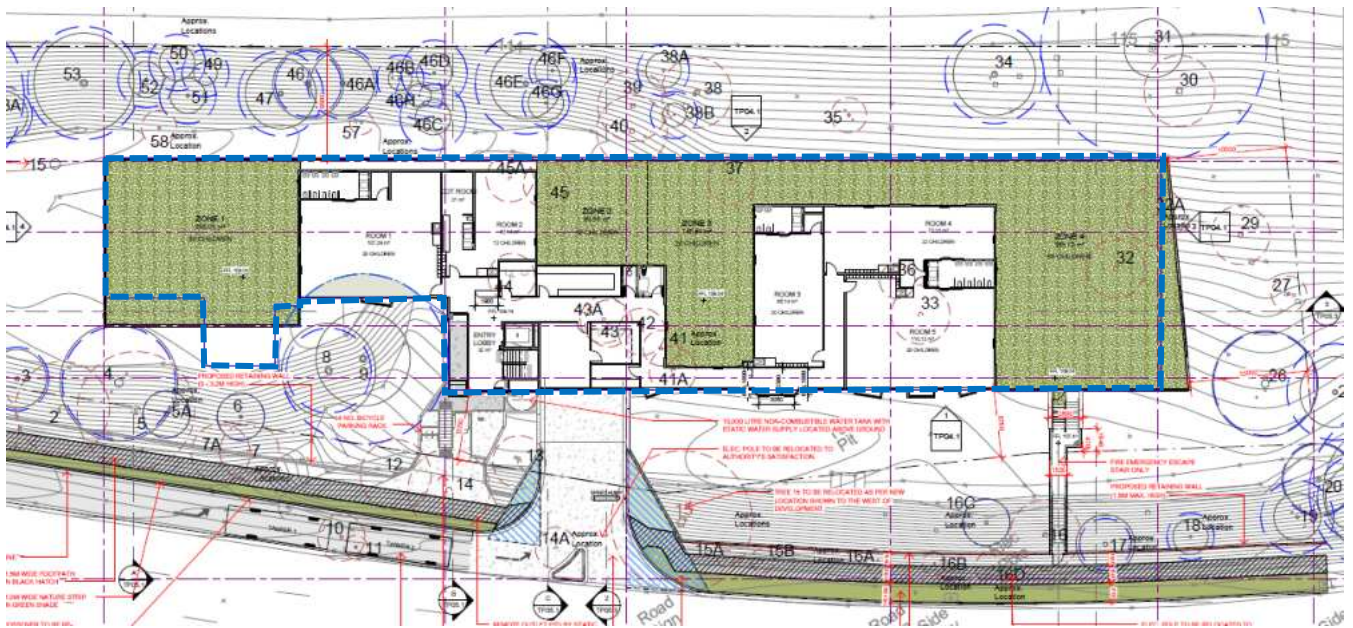


Figure 4: Proposed childcare level as per TP03.2 Revision 8 dated 11 October 2024 (outline of previous building highlighted in blue dotted line)

The proposed changes under the amendment application include the following:

- Reducing the number of rooms from 6 to 5 and splitting the outdoor play area into four zones.
- The entry lobby and office administration areas reconfigured and moved to the southern boundary line with Rooms 1 and 2 moved to the rear of the entrance area.
- Splitting the childcare centre building into two building modules with a connecting corridor with the eastern most building element containing 3 childcare rooms and the building moved to the southern building footprint. Outdoor play area provided to the east, north and west of Rooms 3, 4 and 5.
- A revised outdoor play area (Zone 4) is proposed at the western end of the building in place of the previous medical centre building element.
- The finished floor level of this level has increased from RL 108.89 to RL 109.04 (0.15m increase).
- The setback of the building footprint to the Burwood Highway east of the entry has not changed with a small reduction in the setback of outdoor play area Zone 4 to the east boundary from 10.64m-12.54m to 10m.
- The setback of the building footprint from Burwood Highway west of the entry has increased with the removal of the medical centre stair well and lift.
- The setback of the building from the northern boundary has not changed and remains at 9.5m.
- The setback of the building to the western boundary has not changed.
- The fire escape stair well is shown on the eastern section of the building.

## Elevations

The elevation plans have been updated to reflect the changes made to the building and floor plans as identified above including additional signage information are now included in TP09.

The overall architectural expression of the building remains of a contemporary design including the use of flat roof, low built form and the building continues to be nestled into the site. The previous angled roof form applied to the main entrance of the childcare centre has been revised to a flat roof form with amended window openings and glazing.

The maximum overall building height is 5.73m above natural ground level as shown in section B-B on TP05.1. The previous maximum building height was 5.62m above natural ground level. This maximum building height applies to the central part of the building adjacent to the entry lobby and front façade.



Due to the removal of the medical centre use, the built form of the building is more centralised in the site with the previous medical centre building replaced with an outdoor play area resulting in less building mass at the western end of the building and also an outdoor play area has been placed at the eastern end.

The figures below show the VCAT considered plans relative to the proposed amended plans.



**Figure 5: South elevation of the building as per TP04.1 Revision 8 dated 11 October 2024**



**Figure 6: Proposed childcare level as per TP04.1 Revision 8 dated 11 October 2024**

### Signage

The amended application includes additional signage information relating to the childcare centre specifically to suit the tenant and advertising requirements noting that at the time of the Tribunal's decision the tenants for each use where not known and generic signage was shown. It is also noted that the elevations and plans did not include details of the signage in respect to dimensions, areas or details of illumination with Condition 1.15 requiring details of signage to be provided as part of endorsement of the plans.

The VCAT considered plans included the following signage:

- Medical Centre:
  - sign on the south elevation/façade 'Medical Upper Ferntree Gully'
  - sign on the west elevation 'Medical Upper Ferntree Gully'
- Entry lobby signage: sign above the main entrance on the south elevation 'Upper Ferntree Gully Childcare & Medical'
- Childcare signage: 2 x signs along the southern elevation of the childcare building (one at each the east and west end) displaying 'Childcare Upper Ferntree Gully'

The amendment application removes the medical centre signs and replaces the previous generic signs for the childcare with the following:

- Entry lobby signage: 4.02sqm non-illuminated sign displaying 'Thrive Early Learning Centres' above the main entry on the southern elevation.
- Childcare signage:
  - a group of three integrated signs above the car park entry displaying "Thrive" – 2.2sqm, 'Early Learning Centres' – 3.6sqm and the Thrive 'native plant embellishment' image – 6.9sqm.
  - the display of a 13.85sqm image of the Thrive 'kids playing embellishment' image.



**Figure 7: Proposed southern façade showing location of the proposed amended signage.**

The revised sign designs are integrated into the building, non illuminated and are designed to provide the necessary business identification opportunities. The Permit currently authorises the display of signage in the preamble so no amendments are required to the Permit or conditions.

## 4. AMENDMENTS TO ADDRESS CONDITIONS

In addition to the changes proposed to the considered plans outlined above, the amended plans have also included the information and details required under the current Condition 1 of the Permit. The table below sets out how the Condition 1 requirements have been satisfied.

Condition	Requirement	Changes
1.1	Any modifications to the plans as a result of Department of Transport conditions;	The submitted plans have overlaid the functional layout plan which has been submitted for DTP in accordance with Conditions 39-42 of the Permit. The changes include the left-turn deceleration lane on Burwood Highway widened to 3.5m and retaining walls in the road reserve have been shown and detailed.
1.2	An amended landscaping plan in accordance with condition 8 of this permit	A landscape plan prepared by Stratis Landscape Architects Pty is attached. The plan addresses the requirements of Condition 8 of the permit.
1.3	Any changes arising from the drainage plan in accordance with condition 7 of this planning permit;	Drainage plans have been prepared by MRM Structure Civil Design and details as appropriate have been shown on the architectural plans.
1.4	Any changes arising from the amended Sustainable Design Assessment in accordance with condition 11 of this planning permit	An amended SDA report has been prepared by Keystone Alliance Sustainability Solutions Pty Ltd, to satisfy condition 11 of the Permit.



Condition	Requirement	Changes
1.5	Any changes arising from the car parking management plan in accordance with condition 21 of this planning permit;	Amendments to the car parking layout have been made in accordance with Condition 21 of the Permit with relevant information including grades and dimensions added on TP03.1
1.6	Any changes arising from the waste management plan in accordance with condition 35 of this planning permit;	A WMP has been prepared by Keystone Alliance Sustainability Solutions Pty Ltd with changes accommodated on the plans at TP03.1 and to meet Condition 35 of the Permit.
1.7	A detailed excavation plan, showing the full extent of the excavation to the basement (which must be undertaken in a manner that minimises the extent of cut with no backfilling);	A detailed excavation plan has been prepared at TP08 which clearly shows the extent and depth of cut across the site to accommodate the proposed works. The removal of the medical centre use has reduced the depth of cut required in the western portion of the site.
1.8	The proposed left-turn deceleration lane on Burwood Highway widened to 3.5m unless a lesser width is approved by the Head, Transport for Victoria;	The plans show the left-turn deceleration lane at 3.5m in width. The FLP for the deceleration lane as been submitted to DTP for approval by Stantec.
1.9	Vehicular accessways no steeper than 2.5% where they cross the proposed 1.5m wide footpath and the land required for the future widening of the path to 2.5m;	The attached FLP designs prepared by Stantec show that at the proposed accessway at the footpath will be designed to 2.5% in accordance with this condition.
1.10	Vehicular accessways gradients to comply with the requirements of Clause 52.06-9 at all other locations;	Ramp grades have been shown along the entire length consistent with the requirements of clause 52.06-9.
1.11	The locations of all columns between the car spaces to comply with Clause 5.2 of AS2890.1;	Column locations have been designed to comply with the standard - refer to TP03.1.
1.12	Detailed design of the site access based on architectural perspectives that ensure batters delivered at the existing location that show driver view cone requirements are achieved supported by traffic engineering	The detailed FLP designs prepared by Stantec and architectural plans show that access to the site provides for appropriate view cone requirements which is also supported by the Road Safety Audit.
1.13	The existing street lighting pole on the median relocated, if required by the relevant electricity provider;	A notation has been added on TP03.1 that the existing electricity pole is to be relocated to the satisfaction of the authority.
1.14	Detail of roof finishes, in non-reflective materials;	An amended materials and finishes schedule has been prepared on TP06 which include muted colour tones and finishes.
1.15	Details of the dimensions, materials and colours of each sign.	The location and details of each proposed amended sign is included on TP09.
1.16	Details of any fencing along the eastern and western boundaries.	No fencing is shown on the eastern and western property boundaries.
1.17	Any reduction in the length of the left turn deceleration lane approved by the Head, Transport of Victoria.	The FLP for the deceleration lane has been submitted to DTP for approval by Stantec.

Condition	Requirement	Changes
1.18	The path between the accessible car parking space and lift to the childcare centre having a minimum clear dimension of 1.2 metres.	The pedestrian path between the accessible space and the lift is shown as 1.23m to 1.5m wide – refer to TP03.1
1.19	Any changes arising from the tree management and protection plan in accordance with conditions 13-15 of this permit.	A Tree Management Plan (TMP), prepared by Landscapes by Design and is submitted with the application with relevant information shown on the plans. The plan has been prepared in accordance with Conditions 13-15.
1.20	Any changes arising from the pedestrian and vehicle safety audit in accordance with condition 31 of this permit.	A pedestrian and vehicle safety audit has been prepared by SALT in accordance with Condition 31.
1.21	Pram ramps from the accessway over the kerb at the entrance to each lift.	Ramp grades in the car parking area are shown on TP03.1.
1.22	The Dulux “Buzz” paint to window shrouds and entry portal area replaced with a muted colour/material that blends in with the landscape.	The plans including the materials and finishes schedule has been updated to remove reference the previous Dulux “Buzz’ paint colour with muted colour tones utilised.
1.23	All external or externally visible fencing to be black powder coated.	All fencing associated with the outdoor play areas and where visible are shown to be finished in black a powder coat. Refer also to TP06.
1.24	Detail of retaining wall heights and materials along the frontage within the road reserve.	The plans show the location, height and materials are shown on the plans and elevations and material schedule. The retaining walls are to be constructed of select grey stone.
1.25	Tree 15 to be habitat pruned and relocated within the western landscape area of the subject site as a habitat tree. Location of relocated tree to be consistent with approved Landscape Plan.	All supporting material including the architectural plans, Tree Management Plan and Landscape Plan reference the habitat pruning of Tree 15 and its placement within the western landscape area.
1.26	Details of the relocated bus stop to the satisfaction of Public Transport Victoria.	The attached FLP designs prepared by Stantec show the relocated bus stop including signage. The plan has been submitted to PTV for approval.

In addition to the amendments to plans and reports identified above, the following supporting material has been prepared based on the amended plans and is provided in support of the application to amend the Permit:

- Tree Protection Plan, prepared by Landscapes by Design, dated 22 August 2024, to satisfy Condition 15 of the Permit.
- Ecological Management Report, prepared by Ecology & Heritage Partners Pty Ltd, dated August 2024, to satisfy Condition 19 of the Permit.
- Fire Safety Access Design Review Report, prepared by DDEG (Access) Pty Ltd, dated 21 June 2024.
- Updated Bushfire Management Plan, prepared by Terramatrix, Version 2.5 dated 17 June 2024 to replace the previous Bushfire Management Plan dated September 2022 as referenced in Condition 37 of the Permit.
- Section plans for Burwood Highway including civil works, prepared by Stantec Drawings STN-00-22-DR-CI501200, STN-00-22-DR-CI501201, STN-00-22-DR-CI501250 and STN-00-22-DR-CI501251.
- Road Safety Audit Report, prepared by Road Safety Audits dated 15 July 2024, to satisfy Condition 41 of the Permit.

- Acoustic Assessment, undertaken by Acoustic Logic, dated 30 May 2024, to satisfy Condition 56 of the Permit. The relevant requirements of the Acoustic report including construction materials and glazing details have been shown on TP07.

## 5. INCREASE IN CHILDCARE NUMBERS

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In addition to changes to the approved buildings, the amendment application seeks to increase the number of children allowed to be cared for from 100 to 120 (increase in 20 children). This will require Condition 32 to be amended. It is noted that there are no changes proposed to the approved hours of operation.

The Applicant is seeking to increase the childcare numbers in consideration of the viable operating capacity of a childcare centre having regard to the following:

- The proposal retains 27 on-site car parking spaces for the childcare centre noting that this satisfies the car parking requirements under Clause 52.06-5 which sets a rate of 0.22 spaces per child, resulting in a car parking demand of 26 spaces.
- An increase in 20 children would not unreasonably increase traffic generation for the proposed childcare noting that this has been off-set by the deletion of the previous medical centre use on the land.
- The removal of the medical centre has reduced the intensity of development and uses on the land.
- There has been an overall reduction in the amount of built form on the site through the removal of the medical centre and the additional 20 children are able to be accommodated without the need for an increase in overall floor area or built form.
- The site is not located directly abutting any high amenity or sensitive land uses and is situated on an arterial road limiting off-site amenity impacts.
- An additional 20 children is a minor increase in the already considered and approved 100 children.
- Appropriate consideration has been given to bushfire risk with an updated Bushfire Management Plan prepared by a suitably qualified consultant which confirms that appropriate measures are able to be made to meet the requirements of the Bushfire Management Overlay.
- Appropriate consideration has been given to the potential for adverse impacts on children in the centre from the adjoining rail corridor with an acoustic report prepared by Acoustic Logic Pty Ltd assessing maximum internal noise levels within the centre in accordance with Condition 56. The recommendations in the acoustic report have been accommodated on the plans.

In consideration of the above, the Applicant seeks Condition 32 be amended to allow for a maximum of 120 children to be cared for in the childcare centre.

## 6. CLOSURE

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The Applicant submits that the amendments being sought to the Permit are reasonable and appropriate and remain generally consistent with the intent of the original permit.

Please do not hesitate to contact [REDACTED] [@ricardo.com](mailto:[REDACTED]@ricardo.com) if you have any questions in respect to this matter.

Yours sincerely,

**Ricardo Energy Environment & Planning Pty Ltd**