

1 November 2021

Attention: Rodney O'Brien
Toowoomba Regional Council
PO Box 3021
Toowoomba QLD 4350

Via email: development@tr.qld.gov.au

Dear Peter,

RECEIVED
4/11/2021
TOOWOOMBA
REGIONAL COUNCIL

RE: RESPONSE TO FURTHER ADVICE LETTERS
SECTION 13.2 OF THE DEVELOPMENT ASSESSMENT RULES
689 TOOWOOMBA CECIL PLAINS ROAD, WELLCAMP QLD 4350

We act on behalf of Gainsborough Developments Pty Ltd (the Applicant) in relation to a Development Application lodged with Toowoomba Regional Council under the *Planning Act 2016* (the Planning Act) over the above land seeking:

- a Preliminary Approval for a Material Change of Use and Reconfiguring a Lot for a Variation Request and a Development Permit for Reconfiguring a Lot – Fourteen (14) Lots in Fifty – Eight (58) Lots and Balance Lot in Two (2) Stages)

We received a Further Advice Letter under Section 35 of the DA Rules on the 17 May 2021 and a subsequent Further Advice Letter on the 9 June 2021. A full response to the items raised in the further advice letters is provided in **Appendix A**. In order to address the items raised by Council in the further response letter, a number of changes are sought to the proposed plans, including the following:

- 1) Increase the proposed road reserve widths to comply with *Council's PSP No 2 Engineering Standards Roads and Drainage Infrastructure*. As a result, the Gainsborough Lodge Design Report has been amended to remove any reference to alternative road sections / road widths;
- 2) The north-south road running through the site has been provided as a Distributor Road;
- 3) Allow for a 4.5m wide strip along the Hursley Road frontage of the site to be provided for future road widening;
- 4) As a result of items 1 - 3 above, it was necessary to reconfigure the size and dimension of the Stage 1 area slightly, noting that Stage 1 now provides for the creation of 55 residential lots. Stage 1 will also now be developed without any sub-stages as the super lot/sales office lot has been removed. Furthermore, all lots have been designed to remove direct access to this road.

In support of the response to Council's Further Advice Notice, we attach the following:

- **Appendix A** – Further Advice Response Table;
- **Appendix B** – Response from Bitzios;
- **Appendix C** – Revised Gainsborough Lodge Design Report;
- **Appendix D** – Revised Stage 1 Proposal Plans;
- **Appendix E** – Response from Rob Friend & Associates
- **Appendix F** – Revised Environmental Significance Overlay Plan;
- **Appendix G** – Revised Zoning Plan;
- **Appendix H** – Revised Variation Scheme Document (VSD);

Should any clarification be required, please contact me on (07) 3251 9456 or email at liamwiley@saundershavill.com.

Yours sincerely

Saunders Havill Group

A handwritten signature in black ink, appearing to read 'Liam Wiley', with a stylized flourish at the end.

Liam Wiley

Senior Town Planner

Item	Further Advice Notice #1 Item	Response
1.	MOVEMENT NETWORK DESIGN	
1.1	<p>Aspect of Development: Road Hierarchy</p> <p>The supplementary traffic advice states only low levels of internal traffic will distribute from future urban land to the west onto the north/south road proposed through the development site.</p> <p>Toowoomba Cecil Plains is a State-controlled road and when development occurs on the western site there is no guarantee multiple accesses will be allowed, given there are local government roads that can provide alternative access arrangements. Therefore, more traffic is likely to use the north/south road and a distributor hierarchy status is relevant for the east/west collector street and along the north/south road to Hursley Road.</p> <p><u>Further Information Required:</u> Please amend the Indicative Structure Plan to include:</p> <ul style="list-style-type: none"> ▪ An east/west distributor road connection; and ▪ A distributor road connection from the east/west road to Hursley Road. 	<p>Refer to the response from Bitzios Consulting in Appendix B.</p> <p>In summary:</p> <ul style="list-style-type: none"> • The North/South Road south of the East/West Road is estimated to accommodate up to 322 lots OR 2,898 daily trips based the proposed development and Thurgoona Development • The North/South Road north of the East/West Road may ultimately accommodate 627 lots OR 5,643 daily trips (at the connection to Hursley Road); • Based on the above, the estimated ultimate yield (>300 lots) is consistent with Council's requirements for a Distributor standard road, for the length of the North/South Road. • With regards to the proposed East/West Road, for the reasons provided by Bitzios in Appendix B, the provision of a Distributor standard road connection for the East/West Road is not considered warranted. However, if Council are of the opinion that future external traffic from the West will be high enough to necessitate a Distributor standard, this can be provided/conditioned by Council, noting that this would be considered non-identified trunk infrastructure.
1.2	<p>Aspect of Development: Intersection Treatment at Hursley Road</p> <p>The supplementary traffic advice states a 60m diameter roundabout would be required at the Hursley Road intersection including the provision</p>	Refer to the response from Bitzios Consulting in Appendix B .

	<p>of approach reverse curves. The report also states access for the land to the north could occur at locations other than Hursley Road including Toowoomba Cecil Plains Road and the existing development site to the east. If access to Hursley Road is required, it could occur by the creation of a four-way intersection that is likely to require signals.</p> <p>Given the projected traffic volumes and location of the intersection at the western fringe of the urban street network, a single lane roundabout is considered a more effective treatment in this location.</p> <p>The traffic advice is overstating the design requirements for the roundabout, and further design analysis is required to confirm an appropriate roundabout treatment.</p> <p><u>Further Information Required:</u> Please amend the intersection layout plan and Stage 1 plan to include provision of additional road reserve at the development access intersection allowing for a future single lane roundabout (centred on the existing road) including sight lines.</p>	
1.3	<p>Aspect of Development: Road Reserve Widths</p> <p>The supplementary traffic advice states that from a traffic perspective, road reserve widths can be reduced from those stated in the Planning Scheme Policy PSP No 2. Council does not accept that argument and has designed the road reserve widths to account for a number of factors including traffic, services and landscape. These considerations include:</p> <ul style="list-style-type: none"> Provision of a 2.5m wide bike/breakdown space on distributor roads given there is direct property access proposed and the need to accommodate cyclists, parked vehicles and turn movements; 	<p>As requested by Council, the proposed road reserve widths have been revised to comply with Council's <i>PSP No 2 Engineering Standards Roads and Drainage Infrastructure</i>. As a result, the Gainsborough Lodge Design Report has been amended to remove reference to alternative Road Sections (refer to the revised Design Report in Appendix C). Furthermore, the proposal plans for Stage 1 have also been revised (refer to Appendix D).</p>

	<ul style="list-style-type: none"> ▪ Provision of 0.5m space behind the kerb for stormwater and streetlights; ▪ Provision of a 2m wide street tree zone; ▪ 1.5m separation between the footpath and the property boundary where direct property access is proposed; ▪ 0.5m separation between the footpath and water mains; and ▪ Separation between the water main and electricity/telecommunication services. <p>It is not accepted that the reduced road reserve width can accommodate all these considerations.</p> <p><u>Further Information Required:</u> Please amend the Stage 1 lot layout to include road reserve widths consistent with PSP No 2 Engineering Standards Roads and Drainage Infrastructure. This needs to include all the streets including the distributor road, and the first intersecting street from Hursley Road that services the balance lot to the east of Stage 1.</p>	
1.4	<p>Aspect of Development: Hursley Road Frontage</p> <p>The supplementary traffic advice states there is no need to provide additional road reserve on Hursley Road due to the constraints posed by the overhead power lines and the impracticality of relocating these services. Council has no intention of relocating the power poles and needs the additional road reserve width to provide for footpaths, bus stops and auxiliary lanes on Hursley Road.</p> <p><u>Further Information Required:</u></p>	As requested by Council, the proposal plans for Stage 1 have been revised to provide for 4.5m wide road widening along Hursely Road (refer to the revised plans in Appendix D).

	<p>Please amend the Stage 1 lot layout to include the provision of an additional 4.5m of road reserve along the full development frontage with Hursley Road.</p> <p><i>Note: Where an acoustic barrier/s are required, streetscape elevations of the proposed barrier should be provided.</i></p>	
1.5	<p>Aspect of Development: Pedestrian and Cycle Connection</p> <p>The supplementary traffic advice states active transport connections can be conditioned. Council requires proof of concept for how the connection will be made including the provision of a pedestrian/cycle refuge on Hursley Road.</p> <p><u>Further Information Required:</u></p> <p>Please provide plans showing how a 2m wide path connection could be provided on Hursley Road from the development access intersection to the Sovereign Hills development including a 3m wide pedestrian/cycle refuge on Hursley Road as per MUTCD Part 9 Figure 3.7.3.</p>	Refer to the response from Bitzios Consulting in Appendix B.
1.6	<p>Aspect of Development: Development Access</p> <p>The supplementary traffic advice has analysed the Hursley Road/Site Access at the 10-year design horizon (2039) for the ultimate 470 lots. However, the analysis does not allow for a 1% traffic growth rate on Hursley Road or traffic from existing approved development to the south.</p> <p><u>Further Information Required:</u></p> <p>Please confirm the development access tee intersection treatment has sufficient capacity for the ultimate development including 1% pa traffic growth on Hursley Road and the traffic likely to use the north/south development access when connected to land south of the development</p>	Refer to the response from Bitzios Consulting in Appendix B.

	site. Please confirm the auxiliary lane treatment required to accommodate ultimate development under the above scenario.	
2.0	STORMWATER	
2.1	<p>Aspect of Development: Stormwater Management Plan</p> <p>As advised in the information request, Council will not accept a contribution in lieu of providing onsite stormwater quality treatment. The applicant needs to demonstrate where the bio-retention basin will be provided. Easements also need to be shown for the detention basin and the connecting flow paths from Stage 1 of the development to the lawful point of discharge as defined by QUDM.</p> <p>The Stormwater Management Plan is inconsistent with the Geotechnical Report – Slope Stability Assessment which recommends in section 6.6:</p> <ul style="list-style-type: none"> ▪ That all stormwater shall be collected using appropriate methods to minimise the ingress into the subsurface and prevent all erosion; ▪ Roof water should not be discharged to the allotment and should be piped to the road drainage system (if possible) or to an appropriately engineered and lawful point of discharge; and ▪ Any overflow from water storage tanks should also be piped to the road drainage system (if possible) or to an appropriately engineered drainage system or soaked out to achieve sheet flow. <p>Council's expectation is that stormwater will be either discharged to the street or an inter-allotment drainage system. There may be some exceptions required for the hilltop development but not applied to every lot as suggested in the Stormwater Management Plan.</p> <p><u>Further Information Required:</u></p>	<p>The following comments have been provided by RMA Engineers in response to item 2.1:</p> <p><i>Stormwater quality will be typically managed through bio-retention infrastructure within detention basins. Subject to Council's acceptance, financial contributions may be appropriate to certain post-developed catchments.</i></p> <p><i>In the instance that financial contributions are not accepted for Stage 1, a bio-retention basin (or similar) will be provided within the proposed interim detention basin (MB02).</i></p> <p><i>Details of this arrangement can be included in a DSWMP during Operational Works phase. The easement extent will be confirmed during detailed design when basin outlet configurations are confirmed.</i></p>

	Please provide details about where the bio-retention basin will be provided for the Stage 1 works and the easements required for the temporary basin and flow paths from the development to the lawful point of discharge. The applicant can elect to provide these details now or Council can condition that plan amendments for easements be presented and approved prior to the issue of an operational works permit.	
3.	BUSHFIRE HAZARD	
3.1	<p>Aspect of Development: Bushfire Management</p> <p>A number of the issues raised in the information request have been addressed within Appendix H – Response prepared by Rob Friend & Associates and the associated revised Bushfire Report in Appendix I. The revised report provides better representation of fuel loads and site slopes, indicating that the Hilltop Precinct may be able to comply with requirements, subject to conditions and further assessment of individual lots once details design commences.</p> <p>There is concern that the assumptions in the report indicate a lower than expected BAL and there is inadequate justification to remove all trees from the development footprint area of the Hilltop Precinct for the purposes of mitigating or managing bushfire risk. The following provides further details in relation to the assumptions made by the author of the revised report. It is also considered that a ring road should be utilised in the Hilltop Precinct to better manage bushfire risk and to further reduce the extent of tree loss in the Environmental Significance Overlay area (further detail is outlined in item 4.1).</p>	Refer to the response from Rob Friend & Associates in Appendix E .

<p>Canopy fuel load was not included in the assessment of risk. RE11.8.8 and VHC 11.2 has a total fuel load of 13t/ha. Only surface fuel load of 11.5t/ha was used. The author noted:</p> <p><i>“... given the status of the vegetation within the development site and the potential for the residual area to be managed for both biodiversity outcomes in terms of the Regional ecosystem and for bushfire hazard mitigation outcomes, it is reasonable to conclude that any fire entering this area will remain as a ground fire and not involve any of the mid or upper canopies.”</i></p> <p>It is unclear how the vegetation can be managed such that no canopy fires will occur. As such, the use of only 11.5.t/ha for surface fuel and not the 13t/ha total fuel is not accepted.</p> <p>Based on the 11.5t/ha fuel load, the author notes the Hilltop Precinct can meet a BAL 29 maximum if an APZ of 15m is established (taken from Tables 2 to 9). The Author notes:</p> <p><i>“Based on the above calculations, an Asset Protection Zone within the Private open space area of 15 metres is to be established.”</i></p> <p>Upon further assessment, using the same setback distances and slopes in Tables 2 to 8, it is calculated that BAL40 would be required for all Transects (A to G) if total fuel of 13t/ha was used.</p> <p>Retention of trees in the Hilltop Precinct has not occurred. Refer to the Environmental Assessment Report (SHG). Council consider that individual trees can be retained in the footprint of the Hilltop Precinct as they would be classed as “managed vegetation” against exclusions in AS3595 along</p>	
---	--

<p>with provisions for no overlapping canopies etc.</p> <p>Please note that approval of the revised Bushfire Hazard Assessment and Management Plan is not supported unless it is amended addressing these outstanding requirements. The Author notes:</p> <p>“Within regard to road separations between lots and adjacent vegetation, the Bushfire Hazard Assessment and Management Plan is proposing a 15 metre wide Asset Protection Zone around the Hill Top precinct and within the proposed Private Open Space area. With the function of a road around residential development abutting hazardous vegetation, it serves two purposes, one to separate future buildings from the hazard and two, to provide access for Emergency Services. The proposed APZ will also provide for those two functions and as such it has been provided in lieu of a private roadway.”</p> <p>Notwithstanding the above, the variation request does not indicate a ring road around the Hilltop Precinct. It is noted that the Concept Overall Site Layout Plan (Drawing No C-E035 – A) prepared by RMA shows a conceptual subdivision layout for the precinct which only includes a partial ring road. The proposed concept layout and bushfire management plan should align, and it should be demonstrated that a ring road can be achieved.</p> <p>Information Required: Please provide the following further information including:</p> <ul style="list-style-type: none"> ▪ A revised Bushfire Hazard Assessment and Management Plan which: 	
---	--

	<ul style="list-style-type: none"> ○ Describes how the vegetation within the proposed Private Open Space areas can be managed such that only surface fires will occur and no canopy fires; ○ Revise Tables 2 to 9 to include total fuel load of 13t/ha; ○ Removes any reference to total clearing of trees within the Hilltop Precinct - Note, individual trees can be retained within the Hilltop Precinct without negatively affecting bushfire hazard risk; and ○ Amends the layout to provide a perimeter road constructed within the APZ (note, an alternative option is unlikely to be supported); and <ul style="list-style-type: none"> ▪ Updated relevant plans and documents to reflect a perimeter road in the Hilltop Precinct and additional (potential) tree retention. Please note that any master plan or structure plan that forms part of the Variation Scheme Document will require amendment. Note, this issue will also be raised in the second Further Advice Letter. 	
4.	ECOLOGICAL SIGNIFICANCE OVERLAY	
4.1	<p>Aspect of Development: Tree Retention</p> <p>The following reports were submitted to address the information request item regarding the Ecological Significance Overlay:</p> <ul style="list-style-type: none"> ▪ Appendix J – Response from SHG Env; and ▪ Appendix K – revised Tree Retention and Removal Plan, including 47 sub-plans showing tree retention. <p>Following on from the comments in relation to Bushfire Hazard, it is considered that the proposal has not fully demonstrated compliance with the Ecological Significance Overlay Code. In particular, it has not been fully demonstrated that tree loss has been minimised in the Hilltop Precinct.</p>	<p>Council’s concerns regarding the clearing of all vegetation within the Hilltop Residential Precinct is acknowledged. While our intention is certainly not to clear all trees within this precinct, until the exact location of the future lots, roads and BLEs are confirmed/finalised, we won’t know exactly which trees within the precinct can be retained.</p> <p>In order to ensure that as many existing trees as possible can be retained within the Hilltop Residential Precinct, the Environmental Significance Overlay map has been revised to include the Hilltop Residential Precinct within the Areas of Ecological Significance (refer to Appendix F).</p>

	<p>The following outlines this issue in further detail:</p> <ul style="list-style-type: none"> ▪ Inside the Hilltop Precinct: <ul style="list-style-type: none"> ○ the 651 trees marked for retention are all on land that would be very difficult to build on (steep land / land slip); ○ the 166 trees marked for removal comprise almost all trees within the developable Hilltop Precinct space; ○ 152 of these 166 trees marked for removal (92%) are listed as Non-Juvenile Koala Habitat Trees (NJKHT); and ○ There has been no consideration of retention of any trees on developable land in the Hilltop Precinct; ▪ Inside Council's Environmental Significance Overlay area outside the Hilltop Precinct or proposed open space: <ul style="list-style-type: none"> ○ Approximately 222 NJKHTs are marked for removal; and ○ No trees marked for retention; ▪ Table 6 of the Ecological Assessment Report notes the site includes 1,200 trees greater than 100mm DBH. This means that 549 (1200 – 651) trees on developable land will be removed; ▪ In light of these figures, the application does not meet the following planning and design principals of The Koala-sensitive Design Guideline (DES 2020): <ul style="list-style-type: none"> ○ retain and protect koala habitat values in their natural state to allow koalas to feed, rest and move around; ○ achieve permeability for koalas through the landscape to ensure the safe movement of koalas within and across a site; ○ retaining, enhancing or creating large contiguous patches of koala habitat; and ○ avoiding clearing non-juvenile koala habitat trees on the site, including individual, isolated trees; 	<p>We note that any future development within the Hilltop Residential Precinct will require assessment against the Gainsborough Lodge Environmental Significance Overlay Code.</p>
--	--	--

	<ul style="list-style-type: none"> ▪ The Tree Retention and Removal Plan (App K) does not include indicative lot boundaries or nominated building footprints / Building Location Envelopes (BLEs) per lot. The revised Bushfire Management Plan (App H) also does not include indicative lot boundaries or BLEs. Specifically, App H notes the following: <i>“With regard to lots and potential Building Location Envelopes (BLEs), the Hill Top Precinct is part of the Material Change of Use application and the Reconfiguring a Lot, however at this stage it is just an area and as such will be subjected to an additional Reconfiguring a Lot application at a later date.”</i> ▪ The application does not demonstrate that impacts on areas of ecological significance shown on the Environmental Significance Overlay Maps have been avoided or minimized by: <ul style="list-style-type: none"> ○ minimising the total footprint within which activities, buildings, structures, driveways and other works or activities are contained; ○ avoiding further fragmentation of areas of ecological significance; ○ strengthening internal linkages where possible; ○ retention of habitat trees for fauna of conservation significance; and ○ maintaining areas of ecological significance in patches of greatest possible size and with the smallest possible edge to area ratio; and ▪ Individual trees retained in the footprint of the Hilltop Precinct would be excluded from a bushfire assessment as they would be classed as “managed vegetation” against exclusions in AS3595. <p>It is noted that references to BLEs in the Variation Scheme Document (VSD) were requested to be removed in the Information Request, with</p>	
--	--	--

<p>consideration to be given to using Plans of Development as a suitable mechanism to regulate, where required, future building locations. However, indicative building envelopes are necessary at this assessment stage to demonstrate proof of concept and compliance with the overlay code.</p> <p>Please note that the proposed Gainsborough Lodge Environmental Significance Overlay map (which is included in the VSD) should include requirements in the developable area of the Hilltop Precinct to ensure that future development complies with the overlay code, to the extent practicable considering suitable housing lots and road layouts which mitigate and manage the bushfire hazard.</p> <p><u>Information Required:</u> Please provide the following further information including:</p> <ul style="list-style-type: none"> ▪ A concept site plan should be provided for both the Hilltop Residential Precinct with clearly defined lots and access roads, vehicle access and potential BLEs; ▪ Figure 2 Development Assessment of the Tree Retention Plan is to be updated to show the information (as above); ▪ BLEs based on results of the revised Bushfire Risk Assessment as well as constraints for locally significance trees or habitat trees; ▪ The display of 'Trees to be Removed' and 'Trees to be retained' in Figure 2 is to be amended to show only those trees within the BLEs, road network and access, as trees to be removed; ▪ Plans should be updated to clearly define these areas as vegetation to be retained – this should be reflected in the provisions of VSD; and 	
--	--

	<ul style="list-style-type: none"> ▪ The report and site plans should clearly detail how the Koala-sensitive Design Guidelines are to be implemented across the site, with particular regard to: <ul style="list-style-type: none"> ○ retention and protection of koala habitat values in their natural state to allow koalas to feed, rest and move around; ○ how the lot design and retention of trees achieves permeability for koalas through the development site to ensure the safe movement of koalas within and across a site; ○ retention and enhancement of contiguous patches of koala habitat; and ○ demonstration that the development has avoided clearing non-juvenile koala habitat trees on the site, including individual, isolated trees. <p>Please note that any master plan or structure plan that forms part of the Variation Scheme Document will require amendment. Note, this issue will also be raised in the second Further Advice Letter with a focus on ensuring there are provisions applying to future development of the Hilltop Precinct to better achieve compliance with the current (and VSD version) Environmental Significance Overlay Code.</p>	
5.	PROVISION OF PARKLAND AND STREETScape PLANTING PALLETTE	
5.1	<p>Hilltop Precinct Open Space Tenure</p> <p>The Gainsborough Lodge Design Strategy identifies 'retained existing hilltop vegetation' containing resting nodes, viewpoints, signage and pedestrian trails. Section 3.4 Open Space Strategy talks generally about this area as performing a 'park and open space' function but it is not clear if this area is intended to perform a private open space function or be</p>	<p>No public open space areas are proposed as part of this application. The intent for the vegetated hillside areas outside of the Hilltop Residential Precinct is to maintain these areas as part of communal open space areas for the future community title subdivision of the Hilltop Residential Precinct.</p>

	<p>dedicated to Council. Should the later be intended, it should be noted that Council has no interest in additional area for Council owned and managed open space and the Design Report be amended to make clear the functionality and ownership intent of this space.</p> <p><u>Information Required:</u> Please:</p> <ul style="list-style-type: none"> ▪ Amend Section 3.4 Open Space Strategy and other sections of the Gainsborough Lodge Design Report to clarify the functionality and ownership of the 'retained existing hilltop vegetation' adjacent to the Hilltop Residential Precinct as being retained in private ownership associated with the community title intent of the Hilltop Residential Precinct; and ▪ Identify the proposed tenure of the open space and amend all relevant documents and plans. 	
5.2	<p>Aspect of Development: Planting Details</p> <p>The Gainsborough Lodge Design Plan identifies several variations from Council's standard documents and processes. In particular the following are of concern:</p> <ul style="list-style-type: none"> ▪ Page 27 references 25L pots for street trees. Council preference is 45L pots; ▪ Page 29 proposes multiple planting avenues within the road reserve of the Entry Distributor Cross-section which are not supported. Council's preference is to provide adequate space for a single avenue of large trees; ▪ The proposal for gardens and moundings in the North / South Distributor Cross-section, the Entry Distributor Cross-section and 	<p>As requested by Council, the Gainsborough Lodge Design Report has been revised to address the comments in item 5.2 (refer to Appendix C).</p>

	<p>the East / West Collector Cross section are not supported. Please remove all references to these planting areas; and</p> <ul style="list-style-type: none"> ▪ Pages 35, 36 and 38 propose entry statement gardens on Council road reserve along Hursley Road which is not supported. All gardens to be contained within private land. <p>Street Trees need to be provided along Hursley Road with the following species being preferred by Council, namely Pyrus 'Korean Sun', Lagerstroemia 'Lipan' or Acer beurgeranium. Remove associated planting palette for this area from Design Report.</p> <p><u>Information Required:</u> Please provide an amended Design Report addressing the comments above.</p>	
5.3	<p>Aspect of Development: Interim Local Park Strategy</p> <p>Section 3.5 of the Interim Local Park Strategy proposed delivery of an equivalent Local Recreation Park within Councils Harvey Court Open Space, in order to service the development site prior to Council's intended future upgrade to a District Recreation Park. Generally, Council is not supportive of park infrastructure being delivered earlier than required as it has an increased maintenance and asset lifecycle cost burden which cannot be accommodated within existing resources.</p> <p><u>Information Required:</u> Further information is required to support consideration of the request. Information identifying proposed delivery timing linked to a staging plan is required to understand the cost and other implications to Council should this proposal be adopted. Supporting information in relation to</p>	<p>As requested by Council, it is no longer proposed to utilise any part of the Harvey Court District Park as an interim local park. As such, the Gainsborough Lodge Design Report has been updated accordingly (refer to Appendix C).</p>

8824 - 689 Toowoomba Cecil Plains Road, Glenvale Queensland 4350 – Further Advice Notice Response Action Table

	further understanding the need and reasons as to why the existing parks network cannot service the proposed development is also required.	
--	---	--

#	Further Advice Notice #2 Item	
1.	Legibility of Figures 1 and 2 of the VSD is poor. Figures should be newly presented to ensure that the relevant legend information and other text can be read at A4.	As requested by Council, Figure 1 and 2 have been enlarged so that they are legible at A4. Refer to the revised VSD document in Appendix H.
2.	Page numbering of the VSD is hard to read – please replace roman numerals with numbers.	As requested by Council, the page numbering of the VSD document has been revised to use numbers. Refer to the revised VSD document in Appendix H.
3.	The documents provided to date do not clarify the extent of proposed common property, however, it is proposed that the development will involve the creation of Community Title Subdivisions. Common property lots should be identified in the Figures included in the VSD and where relevant all proposal plans should be updated to include proposed common property lots and future common property lots.	While no common property lots are proposed as part of this application, the Master Plan which has been provided as part of the Design Report, has been revised to acknowledge that the retained existing hilltop vegetation will be maintained as common property as part of any future community title subdivision. We note that any future community title subdivision over the site will be subject to a Code Assessable development application, which will provide exact details of all future private and common property lots.
4.	The proposed Indicative Structure Plan and other plans, where relevant, should be updated to reflect all amendments arising from the forthcoming responses to the Information Request and Further Advices. The issue of road hierarchy and associated road reserve widths, as flagged in the previous Further Advice is of note.	All plans have been revised where required.
5.	The Proposal Plan Stage 1A (Plan Reference 13664-20A) indicates Lot 100 as a “Super Lot” and flags it as a “Potential Sales Office (1)”. Stage 1B (13664-21A) shows further subdivision of the Super Lot into four (4) lots flagging Proposed Lots 37 and 38 as Potential Dual Occupancy Lots.	Sub-staging has been removed and a super lot/sales office lot is no longer proposed.

	<p>The intention of sequential development is not clear from the proposal plans in terms of uncertainty about the location of a potential Sales Office in Stage 1A and its compatibility with the potential Dual Occupancies in Stage 1B. This also raises the question of the timing of Proposed Stage 1B. The Proposal Plans are effectively a Plan of Development however, they do not include sufficient detail to regulate the future development indicated on the Plan. Please also note the comments regarding Sales Office in Attachment A – Variation Document Further Advice Comments.</p> <p>The timing of the proposed stages should be confirmed as this may be relevant for inclusion in any conditions of approval for the Development Permit for Reconfiguring a Lot for Stage 1.</p>	
6.	<p>The Information Request included two (2) attachments. Attachment 1 was a track change markup of the word version of the proposed VSD. Attachment 2 was a table which outlined the various sections of the proposed VSD, summarised the proposed modified provisions and provided comment on the proposed variations including background and information.</p> <p>It is acknowledged that a revised VSD was submitted in response to Council's Information Request and that some responses are summarised in the Response Table (Appendix A to the Information Request) and other attachments to the Information Request.</p> <p>Attachment A to this Further Advice provides additional commentary regarding the VSD. The comments are included in a new column under the heading of Further Advice Comments as an adjunct to the original Attachment 2 to the Information Request.</p>	<p>The VSD document has been revised as per comments from Council. The main changes are as follows:</p> <ul style="list-style-type: none"> • Removal of the Gainsborough Lodge Dwelling House Code and Gainsborough Lodge Sales Office Code; • Amendment of the Environmental Significance Overlay map to include the area within the Hilltop residential precinct; • Removal of Multiple Dwelling and Sales Office from the categories of assessment tables; • Removal of Terrace Lots;

8824 - 689 Toowoomba Cecil Plains Road, Glenvale Queensland 4350 – Further Advice Notice Response Action Table

	<p>Please refer to Attachment A for specific comments in relation to the revised proposed VSD. There is some overlap between the issues raised in Attachment A and those already raised in the recent Further Advice and subsequent Skype meeting. Many issues are minor in nature however, some issues raised highlight aspects of the proposed variation request that are not supported and where insufficient justification or supporting information has been provided to justify the proposed variations. In most cases, the Information Request raised that these same variations were unlikely to be supported.</p>	
--	---	--