

Our Reference: PDA/2023/5733
 CS Portal Reference: N/A
 Contact Officer: Sophie Spencer
 Contact: 07 4688 6808
 Email: development@tr.qld.gov.au

INFORMATION REQUEST

Economic Development Act 2012 Sections 83(1) & 83(2A)

Gasworks Rejuvenation Pty Ltd
 C/- Precinct Urban Planning
 PO Box 3038
 TOOWOOMBA QLD 4350

Email: jess@precinctplan.com.au

25 January 2024

Dear Sir/Madam

Development Application for: Material Change of Use - Shopping Centre and Multiple Dwelling (56 Units)
Location: 1A-3 Neil Street, TOOWOOMBA CITY QLD 4350
Property Description: Lot 3 AG208, Lots 1 to 3 RP16672, Emt D SP193240, Lots 26 to 28 RP16674, Emt C SP193240, Lot 2 RP129701, Lot 1 RP151665 & Lot 5 RP16677
Relevant Development Scheme: *Toowoomba Railway Parklands Priority Development Area (PDA) Development Scheme*

After undertaking an assessment of the Priority Development Area (PDA) development application, Council has determined that further information is required to decide the application in accordance with s.83 of the *Economic Development Act 2012* (the Act). The further information required is detailed below:

1. TRANSPORT ACCESS AND PARKING

1.1	Issue:
	<p><u>End of Trip Facilities for Commercial and Residential Component</u> The end of trip facilities within the <i>Queensland Development Code MP4.1 Sustainable Buildings</i> applies to the proposed commercial component. The submitted plans do not include bicycle end of trip facilities for the retail employees which must include bicycle parking and storage, lockers and change rooms. The required bicycle parking spaces is based on the number of employees.</p> <p>The Traffic Impact Assessment (TIA) assumes a 40% post-development reduction for trip generation for all land uses on the basis of shared trips and the availability of active and public transport modes. Furthermore, the future Principal Cycle Network (Route Priority A – highest priority of delivery) runs past the site on Chalk Drive. As such, it is considered bicycle parking is an integral part of the development including the residential component as well.</p>
	Information Required:
	<p>(a) Provided amended plans to include end of trip facilities in accordance with the Queensland Development Code MP4.1-Sustainable Buildings for the retail component; and</p> <p>(b) To encourage active transport use, provide bicycle parking spaces in the residential tower carpark for residents, with access able to be gained without encroaching into car spaces.</p>
1.2	Issue:

	<p><u>Service Vehicles</u></p> <p>The submitted plans do not adequately address safe and convenient manoeuvring and parking for service vehicles in the following ways:</p> <ol style="list-style-type: none"> 1. The service vehicle for a supermarket is typically an articulated vehicle (AV). The Traffic Impact Assessment (TIA) shows how an AV can drive through the site from Laundry Street but does not show how it will manoeuvre into and out of the supermarket loading dock and then access the exit driveway to Neil Street. If the AV drives forward into the loading dock and reverses out, then it will need to reverse over the pedestrian walkway; 2. There is no designated service bay for Retail 1 -10, typically this would be a heavy vehicle (HV); 3. There is no service bay for the residential tower, typically this would be a small rigid vehicle (SRV); and 4. There is no tenure for the proposed access for Council vehicles (e.g. waste management) through the site from Laundry Street to Neil Street. <p>Information Required:</p> <ol style="list-style-type: none"> (a) Provide amended plans to provide for service vehicles including an AV servicing the supermarket, a HV for the 10 retail units and a SRV for the residential tower. Demonstrate how manoeuvring will occur using turning circles, ensuring there will be no conflicts with pedestrian movements. Service vehicles will need to enter and exit the development site in a forward direction; and (b) Provide a plan showing an easement to allow Council refuse collection vehicles to enter the site from Laundry Street and exit at Neil Street.
<p>1.3</p>	<p>Issue:</p> <p><u>Car Parking</u></p> <p>The submitted plans do not adequately address safe and convenient car parking requirements in the following ways:</p> <ol style="list-style-type: none"> 1. There are no dimensions for parking bays, circulation aisles and driveways shown on the layout plans; 2. The basement carpark for the residential tower does not differentiate the 11 staff car spaces from the 88 residential spaces; 3. Columns need to be inset at least 0.75m from the end of the car space to facilitate manoeuvring by a car into the car space; 4. Two of the PWD retail car parks are not located in the closest proximity to the building entrance; 5. There are no pedestrian splays shown for the car park driveways where they intersect with Chalk Lane and Neil Street; and 6. The footpath treatment does not continue across the access driveway and reinforce the priority for pedestrians. <p>Information Required:</p> <p>Please amend the submitted plans showing the following:</p> <ol style="list-style-type: none"> (a) Dimensions for car spaces, aisles and driveways demonstrating compliance with the nominated user group standards within AS2890.1; (b) Denote the 11 staff parks spaces within the residential development car park. Tandem parking must only be used by the residential users; (c) Show all columns at a 0.75m inset from the end of the car spaces; (d) Provide parking for people with disabilities in the closest proximity to the supermarket entrance; (e) Show pedestrian splays on the layout plans in accordance with AS2890.1 and amend the perspectives to show the required sight lines; and (f) Continue the proposed footpath treatment across the access driveways.
<p>1.4</p>	<p>Issue:</p> <p><u>Pedestrian Access</u></p> <p>The TIA assumes a 40% post-development reduction for trip generation for all land uses on the basis of shared trips and the availability of active and public transport modes.</p> <ul style="list-style-type: none"> • The submitted plans show no proposed footpath connection along the Laundry Street frontage of the development to connect with the existing footpath in Laundry Street.

	<ul style="list-style-type: none"> • The footpath proposed along the Chalk Lane frontage does not continue for the full length of the frontage and connect to Ann Street. • While the proposed footpath treatment on Neil Street is consistent with the City Design Guidelines, the footpath upgrade on Neil Street should include the full width of the verge and be consistent with the footpath fronting the proposal on Chalk Lane given this is a centre development. Please note, as per Item 4.1 street trees cannot be located within the Neil Street verge and must be provided within kerb build outs. • The TIA Figure 8.1 recommends pedestrian facilities across the Neil Street and Laurel Street legs of the Chalk Drive/Neil Street signalised intersection, but this is not the most direct route for pedestrians into the CBD. There are also limited pedestrian crossing facilities at the signalised Chalk Drive/Ruthven Street intersection. Active transport trips need to be supported by safe and direct infrastructure. • Dedication of road reserve is required to ensure all frontage footpaths are located within road reserve.
	<p>Information Required:</p> <p>Provide amended plans to provide footpath connections across all development frontages including:</p> <ol style="list-style-type: none"> (a) Laundry Street – a 2.0m wide footpath connection to the existing footpath with the existing angle parking changing to parallel parking. Show an access easement that allows pedestrian access from Laundry Street to Neil Street and connection to the retail carpark entrance; (b) Chalk Lane – a 4m wide footpath from Ann Street to the retail carpark; (c) Neil Street – the proposed footpath must be full width from the site boundary to the kerb and channel; and (d) Road dedication for all footpaths on the development frontage that will not be located within the existing road boundaries. <p>Further consideration of infrastructure is required to encourage active transport trips to bus stops and the CBD particularly at the Chalk Drive/Ruthven Street and Chalk Drive/Neil Street signalised intersections.</p>
1.5	<p>Issue:</p> <p><u>External Road Network</u></p> <p>The TIA proposes line-marking or medians to prevent vehicles turning right from Chalk Lane to Neil Street in close proximity to the Neil Street/Chalk Drive intersection, and similarly vehicles from the south or west weaving across Chalk Drive to access Chalk Lane. Council's preference is for a solid median to be provided in lieu of line-marking.</p> <p>Information Required:</p> <p>Provide confirmation if solid medians can be provided in lieu of line-marking to prohibit right turn movements from Chalk Lane to Neil Street and weaving across Chalk Drive to access Chalk Lane. Aerial photo sketches are required to confirm the treatments and agreement with TMR will be required for such a treatment on Chalk Drive.</p>

2. STORMWATER MANAGEMENT

2.1	<p>Issue:</p> <p>The Stormwater Management Plan (SMP) does not adequately address the PDA Development Scheme requirements including:</p> <ol style="list-style-type: none"> 1. The adopted hydrological parameters within Table 1 utilising 22mm pervious area initial loss and 2mm/hr pervious area continuing loss values do not align with information provided by the ARR data hub for rural use cases of 40mm and 1.1mm/hr respectively with a median pre-burst rainfall of 3.2mm for 1% AEP events with a duration of 1 hour. It is acknowledged that the development is located in an urban area and that a pre-burst rainfall has reduced the adopted pervious losses. However, justification has not been provided as to why the final adopted parameters were chosen. Additionally, Section 5.3.4 references table 10. There is concern that the proposed development will alter stormwater discharge characteristics; 2. The SMP does not provide modelling or state freeboard compliance with flood depths of notable overland flow paths (e.g. Neil Street) as demonstrated in the Toowoomba Overland Flow Path Study 2022 (TOFPS 2022). There is concern that street infrastructure may not be appropriately designed to convey overland flow and may impact on car park buildings; 3. The SMP states the area within 9m of the southern site boundary will not be filled within the
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	<p>hydraulic model, yet the submitted plans show the area will be filled and includes stairs and columns. There is concern that the proposed development may alter water surface levels and impact upstream properties; and</p> <p>4. Council requires an electronic copy of the TUFLOW files so it can independently review the model inputs and outputs.</p>
	<p>Information Required:</p> <p>(a) Provide an amended SMP and modelling to reflect data available on the ARR Data Hub. Where necessary, additional stormwater detention systems may be required to prevent an increase in peak flows for all ARI's from 2 years to 100 years. Alternatively, provide an amended SMP with detailed evidence which supports and justifies the chosen parameters;</p> <p>(b) Provide an amended SMP to demonstrate that all structures will be provided with appropriate freeboard and/or stormwater infrastructure will be installed to ensure appropriate flood immunity from overland flow to structures. Please also detail effects to water surface levels on upstream properties; <i>Advice Note: Council's overland flow data can be made available to the applicant upon request. A stormwater easement (6m width) within catchment E1 to convey stormwater from Neil Street and Anthony Street to Laundry Street may assist future Council flood mitigation projects in the area.</i></p> <p>(c) Confirm whether the submitted plans require amendment to allow for the 9m no-fill area on the southern boundary or amend the hydraulic model. Re-submit the amended plans or SMP; and</p> <p>(d) Submit a copy of the electronic TUFLOW model utilised in preparation of the SMP. All files including result files are required.</p> <p><i>Advice Note: Council intends to include conditions relating to emergency pump systems for flooding of underground areas (including backup generators), evacuation procedures and evacuation routes.</i></p>

3. WATER SUPPLY

3.1	<p>Issue:</p> <p>The information provided has not satisfactorily demonstrated that there is sufficient capacity in the water network, as there is no water analysis report provided for the proposed development.</p>
	<p>Information Required:</p> <p>Provide a water analysis report which includes the water demand from the proposed development, the proposed water supply connection point location and sizing, internal firefighting requirements and the assessment of Council's existing reticulation system adequacy. The analysis must be undertaken in accordance with Council's <i>Water Infrastructure Policy 2.03</i>.</p>

4. STREET TREE PROVISION

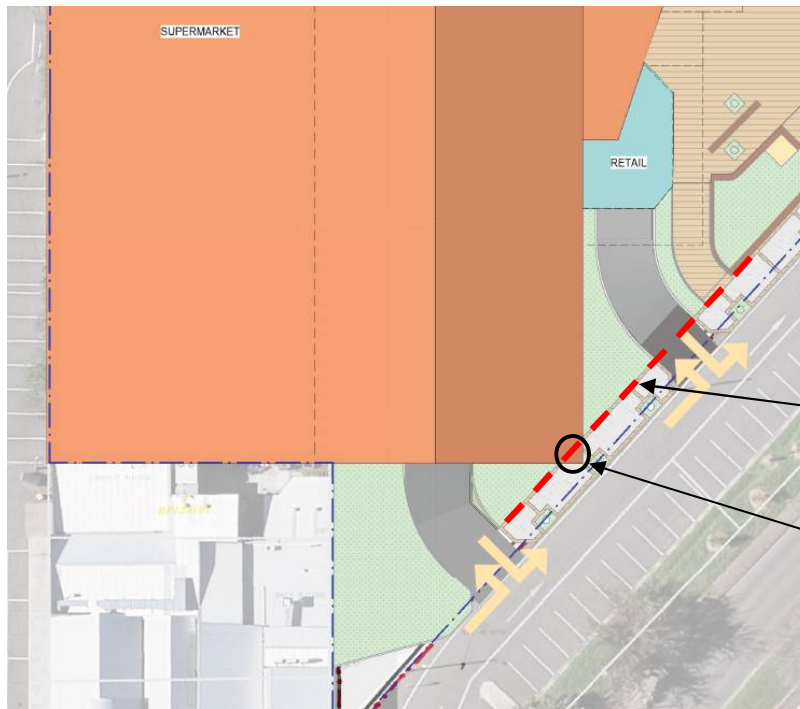
4.1	<p>Issue:</p> <p>The submitted plans identify proposed street trees on both Neil Street and Chalk Lane, contained within the road reserve. The road reserve of both streets is narrow and congested with major services. Further, future conflict between street trees and building awnings is possible. The submitted plans do not identify in cross-section, the available tree planting space for either Neil Street or Chalk Lane, to demonstrate that adequate planting space is provided.</p>
	<p>Information Required:</p> <p>Submit amended plans and a cross-section that show dimensioned planting and growing space (both above and below ground) to facilitate street tree planting fronting the site, achieving separation from services and avoiding conflict with awnings. A response to Item 4.2 below (species type) is also required as part of responding to this request, given that species type will impact on the size of tree cell required and conflict with awnings (if any).</p> <p><i>Advice Note: The minimum available soil planting volume for street trees shall be 10m³ (small tree).</i></p> <p><i>Advice Note: Council recommends the applicant investigate the use of structural soil cells to facilitate tree planting in conjunction with kerb buildouts on Neil Street to gain sufficient clearance from both the gas main located in Neil Street, and to avoid conflicts with proposed awnings. Minimum 2.5m x 2.5m buildouts utilising soil cells or similar to a minimum 1m depth, in combination</i></p>

	<p>with extension of soil cells or similar (for example structural soil), extending under the footpath (for a minimum of 2m) contiguous from the buildouts, would facilitate sufficient planting space for street trees on Neil Street.</p> <p>Similarly, soil cells or similar, extending under the footpath on Chalk Lane (at a minimum 600mm depth), would enable sufficient soil volume for street trees. Given Chalk Lane will be more shaded over a good portion of the day, the applicant may investigate smaller (6-8m high) trees as a suitable alternative, where this does not conflict with the awnings.</p>
4.2	<p>Issue:</p> <p>The submitted Landscape Plan includes a Tree Species palette:</p> <ul style="list-style-type: none"> - <i>Elaeocarpus eumundi</i> (Eumundi Quandong). This species is likely to struggle at this location (unless a very sheltered warm micro-climate location is utilised). The site is at a low point and is subject to harsh frosts and cold winter conditions. - The other species proposed are generally very large growing trees (suited to site, but unsure if suited to function), some of which develop very large, aggressive spreading root systems (<i>Ficus hillii</i> and <i>Brachychiton acerifolius</i> in particular). Trees of such size (large to very large when mature) need sufficient soil root volume to ensure the trees can grow true to form. For large species trees such as ones proposed, a minimum soil volume available to tree roots of at least 65m³ should be provided. (Note – typically for soils in Toowoomba, unless structural soil cells or other artificial means to increase available soil depth for tree roots are used, the typical soil rooting depth is no greater than 600mm). - There is concern that, with the current tree species selection, planting areas of 10m by 11m would be required (at nominal 0.6m depth). There is also concern that the street trees will conflict with the awnings. - In reference to Street tree species, the following are suggested options: <ul style="list-style-type: none"> - <i>Ginko biloba</i> 'Princeton Sentry' - <i>Quercus palustris</i> 'Green Pillar' - <i>Liriodendron tulipifera</i> 'Fastigiata'
	<p>Information Required:</p> <p>Provide an amended Landscape Plan with reviewed tree species palette and assign general species to function (i.e. Street tree species palette; Plaza tree species palette etc).</p>

5. ARCHITECTURE

5.1	<p>Issue:</p> <p><u>Supermarket Roof Line</u></p> <p>The Roof Plan shows the supermarket roof line over the proposed Chalk Lane footpath. Council intends to require the dedication of the pathway as road reserve, and as such the roof would extend into the road reserve (over public footpath) -see image below. As the roof does not act as an awning, it must be contained within the site boundaries including road dedication.</p> <p>Furthermore, the extent of the supermarket roof is unclear particularly whether the roof area is larger than the supermarket floor area. Submitted elevations and perspectives do not appear to show roof eaves/overhanging beyond the supermarket floor area. However, the Short Section (Page 31) shows a roof overhanging the eastern (Neil Street) and western facades.</p> <p>Elevations show perforated metal on the supermarket building facing Chalk Lane (used for signage) and also near Neil Street. This appears to extend beyond the roof line and building line and is not shown on the roof plan or floor plans.</p> <p><u>Awnings</u></p> <p>The heights and depths of the awnings have not been shown on submitted plans. Awnings must be dimensioned and positioned to provide effective shelter for pedestrians using public footpaths (Neil Street and Chalk Lane). Council's preference is for awnings to cover the full width of pedestrian pathways fronting the site wherever possible. Awnings should be horizontally setback from the kerb to avoid conflict with street trees and vehicles at the kerbline. Refer to Item 4.1 and</p>
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4.2 about smaller trees on Chalk Lane and tree cells in kerb builds out in Neil Street.



Red dashed line- Likely road reserve widening

Roof within road reserve (over pathway)

Information Required:

Provided amended plans showing:

- (a) The extent of the roof line contained within the site boundaries which considers the intended road dedication;
- (b) The perforated metal extensions to the supermarket; and
- (c) The dimensions (height above pedestrian level and depth) of awnings.

5.2 Issue:

Schedule of Materials and Finishes

There is insufficient detail about materials and finishes provided on the submitted plans. In particular, details about the following are unclear:

- Balustrade materials for the dwelling balconies (considering any requirement for acoustic attenuation) and of the railing adjacent to Neil Street;
- Type of corrugation and metal for the north facing supermarket wall;
- Supermarket roof materials; and
- Awnings materials (glass or perspex) including framing.

Information Required:

Provide a detailed Schedule of External Finishes that includes the following:

- (a) Identification of each of the materials and colours used in the elevations; and
- (b) Includes details of the above listed elements.

The rendered and labelled elevations should include the following for each material (where known):

- The common name of each material (e.g. aluminium, frosted glass, painted concrete tilt-up panel);
- The manufacturer's name for each material (it may be useful to include internet addresses to the manufacturer's internet site (if available) that provides a pictorial representation of the nominated material);
- The common name for the proposed colour of the material;
- The manufacturers name for the proposed colour (whether paint or pre-finished material); and
- A description of surface texture, where relevant (smooth finish rendered face brick).

	The above information should be presented in a table format, including a legend to indicate the area of the elevation drawing of the building that will use that specific material and colour. In addition, it may be useful to provide a sample board to illustrate each of the materials used in the external finishes.
5.3	Issue:
	<u>Permeability and Accessibility</u>
	The proposed footpath along the northern boundary adjacent to bin storage (Laundry Street link to Neil Street) should be 3m wide (concrete path) to allow safe shared use by pedestrians and cyclists, with landscaping additional.
	Shade trees should also be provided within the landscaping strip to provide shade to the path and adjacent car parks. Diamonds in the car park could provide additional planting area for the shade trees.
	Information Required:
	Provided amended plans, particularly Landscape Plans, that show: <ul style="list-style-type: none"> (a) A 3m wide pathway for the proposed Laundry Street link, where this does not impact on service and refuse vehicle manoeuvring; and (b) Additional trees within the adjoining landscaping strip to sufficiently shade the pathway and car parks.

6. LANDSCAPING

6.1	Issue:
	<u>Materials of Pedestrian Surfaces and Edge Treatments</u>
	There is insufficient detail about materials and finishes of the pedestrian zones and surfaces within the plaza. Edge treatments including retaining structures, barriers and fencing should also be shown.
	Information Required:
	Provide an amended Landscape Plan showing the materials of on-site pedestrian surfaces, particularly in the plaza and edge treatments (retaining structures, barriers and fencing).
6.2	Issue:
	The submitted Landscape Plan includes a list of Plant Palette. The location of tree species is not shown. It is not clear there is sufficient planting volume for the tree species. Please refer to the advice in Item 4.1 and 4.2 about the tree species selection and the suitability of planting area.
	In particular, it is not clear there is sufficient planting volume within containerised and podium planting to ensure the successful growth of trees.
	<i>Advice Note: Council acknowledges that the submitted Landscape Plan is conceptual only, and a Detailed Landscape Plan will require endorsement should the application be approved.</i>
	Information Required:
	Provide an amended Landscape Plan that shows: <ul style="list-style-type: none"> (a) Planting stock sizes, specifically shade tree species and container depths to provide sufficient growing medium for successful growth of soft scaping long-term, including any consideration of any wind tunnelling impacts; (b) Planter boxes have suitable depths and dimensions for the specified plants so that the purpose can be achieved. Trees should have a minimum planter box depth of 1.8m; (c) Further to Items 4.1 and 4.2 about tree species, consider the type of tree species appropriate for the planting area available.
6.3	Issue:
	<u>Structural Components of Awnings</u>
	Additional dimensions and details are required to confirm that the proposed awning will provide suitable protection and function for pedestrians, and that the awnings are not in conflict with proposed plaza and planting areas e.g. shade tree canopies, planting areas, centre activation activity zones e.g. table tennis.
	Confirmation is required whether there will be any structural elements of the awnings (posts) and where these will be located.



Information Required:

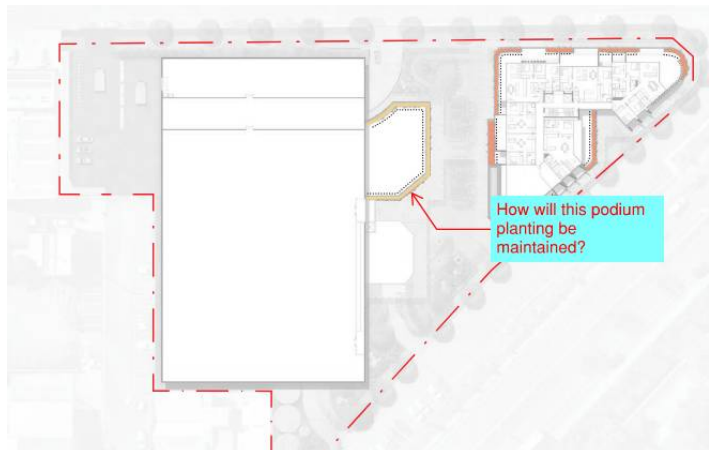
Provide an amended Landscape Plan that:

- (a) Demonstrates the awning will not conflict with proposed on-site planting and will still achieve its function as pedestrian shelter; and
- (b) Confirms whether or not there will be any awnings structures (posts), and if so, shows the location(s) demonstrating the amenity and function of the plaza and planting areas (e.g. planter boxes, table tennis) will not be compromised.

6.4 Issue:

Maintenance Access to Podium Planting

Podium planting requires suitable irrigation, drainage, and safe access for maintenance.



Information Required:

Demonstrate how podium planting above retail areas will be safely accessed for maintenance.

6.5 Issue:

Details of the proposed ramps have not been provided and it is unclear whether these meet *Disability Discrimination Act 1992* (DDA) compliance, to ensure unimpeded access is permitted for users.

Information Required:

Provide details including amended plans that demonstrate proposed ramps to, from and within the site meet DDA compliance (grades, length of ramp, spacing of platforms) and ensure unimpeded access is permitted for users. Provide additional detail specifications where handrails, sightlines and signage are required.

7. WASTE

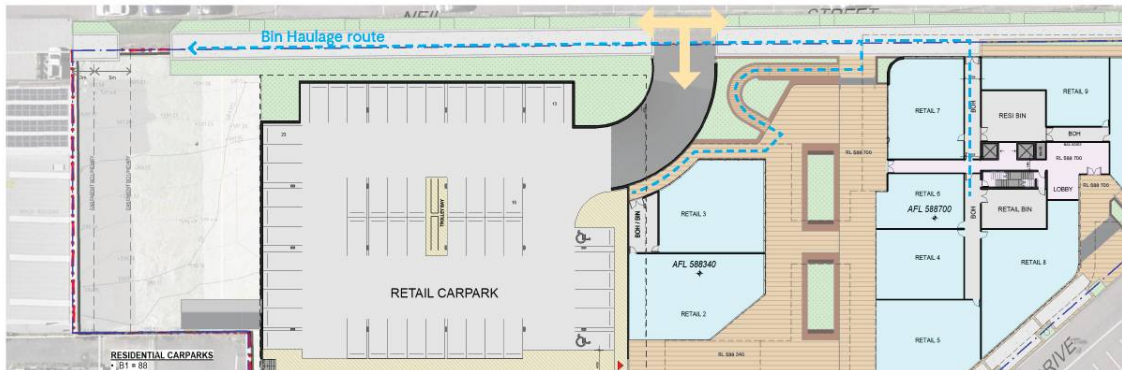
7.1 Issue:
Waste Haulage Route

The submitted material shows a bin haulage route for Retail Shops 1-10 and the 56 dwellings in the residential tower along the public footpath on Neil Street (approximately 110m) to the loading dock at the rear of the supermarket, as per the image below.

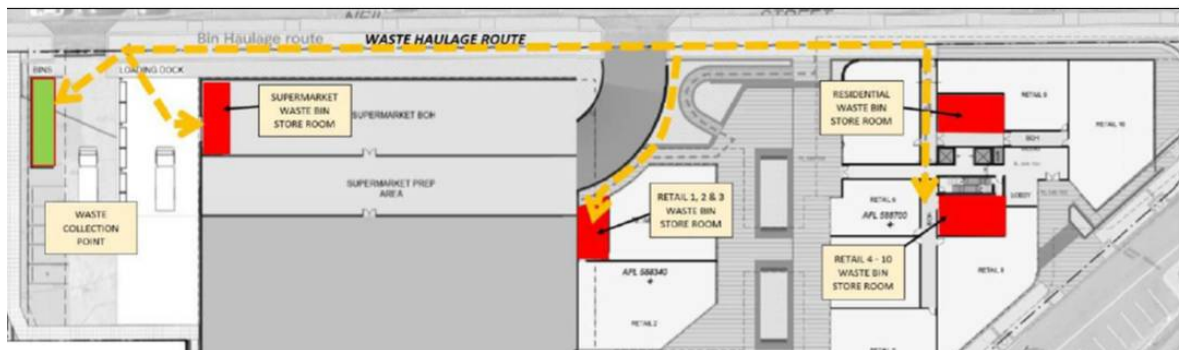
05 / Plans and Sections

Concept Design
20 December 2023

Toowoomba Gas Works
220738



- It appears that up to 30 bin movements per week (for retail stores and dwellings) will occur on the proposed bin haulage route. This is an unacceptable risk to public safety on a public footpath. An alternative path contained within the subject site and separate to public footpaths, must be provided to address safety.
- It is unclear if a 1100L bin and tug servicing Retail Shops 1-3 can fit through the meandering pathways and grades of the ramps shown.
- The bin haulage route shown in the Waste Management Plan does not accurately show the route from Retail Shops 1-3, as per the image below.



Information Required:

Provide amended plans and an amended Waste Management Plan that addresses the following:

- Provides an alternative bin haulage route contained within the site and separated from public footpaths;
Advice Note: The applicant is requested to consider a more direct and on-site bin haulage route from the residential tower through the supermarket carpark. An industrial lift would be required to shift bins to the loading dock for refuse collection.
- Confirmation the bin haulage route for Retail Shops 1-3 is of sufficient dimensions and grade for a 1100L bin and tug, ensuring the ramp is designed to ensure the waste bin and tug can turn around the tight corners; and
- Consistently shows the bin haulage route.

8. REVERSE AMENITY NOISE

8.1 Issue:

The applicant submitted a Noise Impact Assessment:

- Noise from the proposed commercial uses (shopping centre and retail shops) as well as

	<p>the public plaza may adversely impact the proposed dwellings. This noise impact has not been addressed through modelled noise impacts. Section 8 of the submitted report states that noise emissions will be mitigated by awnings, shopping centre surrounds and a body corporate by-law. No quantitative assessment (modelling) has been provided to validate these assumptions. It is noted that noise reduction required to address road traffic noise from the State-controlled Chalk Drive will only require building attenuation on the south, west and north-west facades. This leaves the northern and eastern facades open to noise impacts from on-site activities and surrounding industrial uses; and</p> <p>(b) Plate 2.1 lists both monitoring points as ML2. This Plate must be revised to differentiate between ML1 and ML2.</p> <p><i>Advice Note: Sections 2.2, 3, 4, 5 of the Noise Report as they relate to road traffic noise monitoring, modelling and mitigation (Rw) are acceptable.</i></p> <p>Information Required:</p> <p>Provide an updated noise report including the following:</p> <p>(a) Noise modelling for the shopping centre and commercial uses around the central plaza on the proposed residential development and correlate any require building treatments with those required from the road traffic noise assessment; and</p> <p>(b) Revised Plate 2.1 to differentiate between ML1 and ML.</p>
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9. PLANS & GFA

9.1	<p>Issue:</p> <p>The submitted plans do not show dimensions or area of dwelling balconies.</p> <p>Information Required:</p> <p>Provide dimensioned plans showing the areas of dwelling balconies.</p>
9.2	<p>Issue:</p> <p>The submitted Traffic Impact Assessment (TIA) describes the need for a number of access treatments (BAL, etc) and intersection treatments (e.g. linemarking or median for no-right turn at Chalk Lane/Neil St, give-way linemarking from Ann Street to Chalk Lane, left-turn from Chalk Lane to Chalk Drive, zebra crossing on Chalk Lane). Preliminary designs should be provided on the Site Plan, to understand the development in the context of adjoining roads.</p> <p>The submitted plan have not shown the widths of crossovers. In particular, it is unclear how wide the crossover from Laundry Street will have to be for waste collection and servicing in the loading dock to function.</p> <p>Information Required:</p> <p>Provide an amended Site Plan showing:</p> <p>(a) roads fronting the site including any proposed treatments/changes, in particular, the proposed left-out from Chalk Lane to Chalk Drive, Chalk Lane zebra crossing, no-right turn at the Chalk Lane/Neil Street intersection, and give-way linemarking from Ann Street to Chalk Lane, must be shown; and</p> <p>(b) dimensioned vehicle crossovers.</p>

10. ECONOMIC NEEDS ANALYSIS

10.1	<p>Issue:</p> <p>Precinct 3 criteria 3.6.3(a) of the <i>Toowoomba Railway Parklands Priority Development Area (PDA) Development Scheme</i> provides for local convenience commercial and retail activities that do not compete with the CBD, particularly where not exceeding a GFA limit of 1,500m² for a single supermarket as part of a 2,000m² maximum GFA shopping centre.</p> <p>The proposed supermarket of 4,293m² GFA and retail tenancies of 1,746m² GFA exceed the thresholds of the Development Scheme of 1,500m² GFA and 2,000m² GFA respectfully.</p> <p>Council's appointed peer reviewer has identified a number of concerns regarding the submitted Economic Needs Assessment. Please refer to Attachment 1 – Economic Peer Review.</p> <p>Information Required:</p> <p>Provide an amended Economic Needs Assessment that addresses the issues raised in Attachment 1 – Economic Peer Review.</p>
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11. STATE INTEREST - ECONOMIC DEVELOPMENT QUEENSLAND

11.1	Issue:
	Economic Development Queensland has carried out a state interest review of the development application and advised that further information is required to consider relevant state interests. Please refer to Attachment 2 – EDQ Information Request.
	Information Required:
	Provide a response that addresses the issues raised in Attachment 2 – EDQ Information Request.

Responding to Information Request

Please provide one (1) electronic copy **OR** two (2) hard copies of the response to the information request to Council, including any submitted plans and supporting information. The response to this Information Request must be forwarded to:-

By post:

Chief Executive Officer
C/- Assessment Manager
Development Services Branch
Toowoomba Regional Council
PO BOX 3021
TOOWOOMBA QLD 4350

OR

By email:

development@tr.qld.gov.au

In accordance with s.83A(2) of the Act, the application will lapse if any of the stated information is not given to Council within **three (3) months** from the date of this notice, or longer agreed period.

Notice of Application

Please note that under s.84(1)(a), of the Act, notification of the application is required. Under s.84(3) of the Act, notification of the application cannot commence until Council gives written notice under s.83B stating that the applicant has complied with the information request, and that notification can commence. Furthermore, under s.85(1) of the Act Council cannot decide the application unless:

- Council gives written notice under section 83B stating the applicant has complied with the information request; and
- Council has decided under sections 84C(2) or 84D(2) that the applicant has substantially complied with s.84 (notification of the application).

Should you have any queries in relation to the progress of your PDA development application, please do not hesitate to contact Council's Senior Planner, Sophie Spencer on 07 4688 6808.

Yours faithfully



Matthew Coleman
Principal Planner, Planning

Attachment 1 - Economic Peer Review

Attachment 2 – EDQ Information Request

Attachment 1 - Economic Peer Review

24001
24 January 2024

Chief Executive Officer
Toowoomba Regional Council
PO Box 3021
TOOWOOMBA QLD 4350

Attn: Ms Sophie Spencer

Dear Sophie,

Re: Peer Review of Economic Needs Assessment, Proposed Shopping Centre, 1A-3 Neil Street, Toowoomba City (PDA/2023/5733)

As requested, we have undertaken a peer review of the *Economic Needs Assessment* (ENA) report (dated November 2023) prepared by Urban Economics (UE) for a proposed Shopping Centre use at the above noted site.

Based on submitted plans, the proposed development comprises:

- a large supermarket tenancy of 4,293m² GFA expected to be occupied by Fresh & Save;
- Shop tenancies (x10) totalling 1,581m² GFA; and
- a total of 56 dwelling units.

The submitted ENA report pertains to the supermarket and retail specialty uses.

Purpose of Peer Review

The purpose of this peer review is to advise Council whether the Urban Economics report is sufficiently robust to rely upon in its decision-making, and if not, what additional information should be requested.

More specifically, our review examines and comments upon:

- The appropriateness of the methodologies and approach adopted in the report to formulate the conclusions;
- Whether there is a demonstrated economic need for the proposed Shopping Centre use in this location;
- Whether the proposal would potentially have undue/unacceptable impacts on the viability or function of designated centres nearby; and
- Any deficiencies within the report or other information the report should include.

Our peer review is organised to generally align with the chapter headings and content of the UE report, followed by our conclusions and final comments.

1. Background

The UE report notes that the subject site is within the Toowoomba Railway Parklands PDA and therefore the DA will be assessed under the Toowoomba Railway Parklands PDA Development Scheme.

At this site, the PDA Development Scheme limits development to include a single supermarket not exceeding 1,500m² GFA, as part of a shopping centre with up to 2,000m² total GFA (Preferred Outcome (a) of 3.6.3, Precinct 3, Ruthven Street precinct).

The aim of the ENA is to demonstrate overwhelming need as a relevant matter and reason for approval despite non-compliance with the PDA Development Scheme, specifically its GFA limits.

2. Subject Site and Proposed Development

Section 2 of the report provides an adequate overview of the proposed development and local context. It is appropriately noted that Fresh and Save is a growing brand in Queensland with a focus on price competition. The brand has no current presence in the Toowoomba retail market.

3. Planning and Economic Framework

The UE report gives an appropriate overview of the relevant planning and economic development framework for the region and PDA.

With regard to retail, the intent for the Ruthven Street precinct (which contains the subject site) is to provide commercial and business activities that serve the needs of the residents of the precinct and the broader PDA. However, we note that the proposed supermarket of 4,293m² GFA would serve an area much wider than the PDA alone (as acknowledged by UE).

It should be noted that other precincts with the PDA are also intended to accommodate retail uses.

4. Centres Network

Section 4.1 of the report provides useful background information regarding the trends and evolution of food retailing. Section 4.2 goes on to introduce the 'Study Area' defined by Urban Economics and identify the designated centre zones in and near said Study Area.

The report states that there are no existing supermarkets within the Study Area, however this is purely a function of the Study Area selected by UE. As illustrated in report Figure 4.2, there are several supermarkets just beyond the defined Study Area which would serve Study Area residents.

Urban Economics identifies the proposed Woolworths retail centre at the corner of Isaac and Ruthven Streets, North Toowoomba (MCUI/2022/5495). In August 2023, Foresight Partners completed a peer review of the economic assessment supporting this application. Subsequently, Council issued a Further Advice notice requesting additional economic analysis to justify the proposal. Although it is acknowledged this application is still under assessment, the application's outcome is of significance given its proximity to the subject site (approx. 2km north).

5. Study Area Analysis

UE's defined Study Area is used as the main trade area in their assessment of demand and need for the proposed Shopping Centre. In our opinion, the defined Study Area is unreliable for the following reasons:

1. The subject site is located at the extreme periphery of the Study Area. This has the unrealistic implication of excluding nearby residents to the west and south (such as those within walking distance) for whom the proposed development would be conveniently located.
2. The Study Area excludes most of the Railway Parklands PDA. This contradicts the planning intentions of the Development Scheme in that retail development on the subject site is envisioned to meet the needs of the Ruthven Street precinct and the broader PDA.
3. A Fresh and Save supermarket at this site would draw thinly (low market share) from a wide area due to its unique appeal, discount pricing, and this being the brand's first location within the Toowoomba market.
4. The Study Area excludes any supermarkets which the proposal would realistically compete with. This compromises any meaningful supply-demand comparison.

In our view, the defined Study Area is of little value in this assessment and should be revised in consideration of the above.

Population and Household Growth

We take no issue with UE's analysis of the historic population of the Study Area. However, the report incorrectly implies that part of the Railway Parklands PDA is in the Toowoomba East SA2, whereas this is not the case.

UE's population projections for the Study Area are generally reasonable. The projected increase of 910 residents between 2023 and 2036 implies an average of 70 new residents per annum. We would consider the study area as a relatively low growth area.

Our main criticisms are that:

- despite being so close, much of the PDA and its future population is excluded from the defined Study Area; and
- the number of dwellings (or households) in Table 5.3 should be reduced given that:
 - a) UE's estimate of dwellings at 2021 exceeds the total number of dwellings in the Study Area (5,448)¹; and
 - b) there were around 1,050 residents in boarding schools and aged care facilities in 2021 meaning that they do not form part of private households².

Demographic Profile

UE provides a largely accurate analysis of the demographic profile of the Study Area.

Our main difference of opinion relates to average household income. This is likely a minor and esoteric matter explained by our respective treatment of Census data and its limited detail in the upper income brackets (i.e. the upper limit of Census data for household income is \$4,000+ per week).

¹ Total dwellings data sourced from ABS QuickStats for each Study Area SA1.

² Source: Persons by type of non-private dwelling, ABS Tablebuilder.

6. Demand Analysis

First and foremost, our previous comments with regard to the inappropriateness of the defined Study Area undermine the usefulness of the demand analysis.

Despite this, our key comments in respect of UE's demand analysis are as follows:

1. In our view, UE's estimate of average annual retail spending by Study Area households (\$36,670) is slightly understated. This is likely due to our differences in estimated average annual household income.
2. As mentioned earlier, it is our view that UE should adjust the estimate of Study Area households downwards before calculating total spending. This is because UE's 2021 Study Area households estimate exceeds the total number of dwellings and there are over 1,000 residents in non-private dwellings.
3. UE's estimate of supermarket spending as a proportion of total spending is considered reasonable.
4. The UE method applies an average productivity of \$8,000/m² to estimate supermarket floorspace demand. This productivity is considered low and has the effect of overstating supermarket demand. We would expect a benchmark supermarket productivity of around \$9,500/m² to \$10,000/m². At \$9,500/m², supermarket demand under UE's spending estimates would be 6,737m² in 2023 increasing to 7,305m² by 2036.
5. The UE report does not provide any analysis to support the proposition that the current supply of supermarkets is inadequate to meet demand. Despite their estimated demand for 8,000m² of supermarket floorspace in 2023, supermarkets within 1km of the Study Area provide a combined 17,877m² of floorspace. This is particularly significant as there is substantial overlap between the Study Area and the trade areas of existing supermarkets.
6. UE's assessment of demand for 'convenience retail space' (presumably for the proposed retail specialty stores) should be considered as indicative only as demand would substantially depend on the local competitive supply (as acknowledged by UE). Applying a fixed 20% of total retail spending directed to convenience retail facilities across the catchment is superficial at best.

Ultimately, the demand analysis in the UE report does not provide justification of economic need for the subject proposal.

Market Share and Turnover

Our comments on UE's market share and turnover analysis are as follows:

1. The Study Area should be revised to better reflect the proposed uses.
2. It appears there is an underlying error in UE's calculations given that the sum of expenditure on 'Food at home' and 'Food eat out' in Table 6.2 (\$101.7m in 2023) significantly exceeds 'food' expenditure from Table 6.1 (\$85.4m).
3. Another calculation error is apparent given that UE's reported productivity of \$6,023/m² in 2026 (Table 6.2) multiplied by the proposed retail floorspace (5,874m²) equals a turnover of \$35.4m. This is inconsistent with UE's estimated turnover of \$37.4m in 2026 (Table 6.2).
4. Arithmetic errors aside, UE estimate that the proposed development would capture market shares of 25% of 'Food at home', 20% of 'Food eat out', and 2% of 'Non-food' spending by Study Area residents. In our opinion, the prospects of the proposal achieving the projected market shares of food spending are low due to competition

with many existing supermarkets and other retail uses. For example, the majority of Study Area residents live closer to competing supermarkets than the subject site.

Whilst we acknowledge that the report claims that the market share assessment allows for supermarkets outside the Study Area, we question the likelihood of the market share estimates.

5. Of total turnover, \$25.1m (67.1%) is expected to be generated by the proposed supermarket. This implies a productivity of \$5,847/m² which is very low, even for a discount supermarket. We expect this is around the minimum viable sales level for a Fresh & Save store.
6. Estimated retail specialty turnover of \$12.3m is equivalent to a productivity of \$7,780/m² which represents a healthy sales level.

In our view, the report's market share assessment contains multiple flaws and should be revisited.

7. Need Assessment

UE assert that there is a significant economic and community need for the proposed development.

While we agree that the development has its merits and benefits (e.g. provision of a new discount retailer), the submitted assessment does not provide a robust and clear demonstration of economic need. This is due to the inappropriate Study Area, questionable consideration of existing competition, and calculation errors.

8. Impact Assessment

The UE report provides a quantitative impact assessment in Table 8.1. Our relevant comments and views are set out below:

1. The distribution of impacts estimated by UE is generally reasonable.
2. Projected impacts upon Northpoint SC are approaching a level warranting concern. However, the post-impact productivity level of \$8,070/m² represents a viable level.
3. The leasing brochure for Northpoint SC reported sales of \$65.9m (YE Jan 2023) excluding ALDI and the Super Rooster complex. Sales levels in the impact analysis should be adjusted upwards accordingly.
4. A paid retail industry publication indicates that Grand Central SC achieved MAT of \$490.5m in 2023 compared to UE's estimate of \$500m. A minor revision to this estimate would not imply impacts of an unacceptable level upon Grand Central.
5. There is a minor inconsistency between projected turnover of the proposal between Table 8.1 and Table 6.2.

In our view, the impact analysis is generally reasonable, and the suggested amendments would not imply that economic impacts would undermine the viability or role of existing centre zones.

We acknowledge and accept the potential community benefits raised by UE in Section 8.2.

Implications for PDA and CBD

We agree that economic impacts of the proposal would not threaten nor undermine the CBD. However, further information and analysis is required to justify an economic need to significantly exceed the retail GFA limits imposed by the PDA Development Scheme.

Peer Review Conclusions

During the peer review process, we have identified several errors and issues that impact the reliability and robustness of the Urban Economics report. Our major concerns relate to the appropriateness of the defined Study Area and the demand and need assessments. Further work is required to justify the presence of a clear economic need for the proposal.

We recommend that Council invite the applicant/Urban Economics to provide an amended economic need assessment that includes:

1. Revision of the defined Study Area to appropriately reflect the likely main trade area of a warehouse/discount supermarket brand not present in the Toowoomba market. It is expected that the subject site would be relatively central within the main trade area and the use of secondary trade areas may be warranted.
2. Amendment of the population projections, spending forecasts, and demand analysis based on the revised Study Area.
3. Provision of an explicit assessment of need for supermarket uses (or floorspace) in the revised Study Area to support the proposition that the current supply of supermarkets is inadequate to meet demand. It would assist to outline the expected share of supermarket spending directed to each existing centre/supermarket with due consideration of their respective trade areas.
4. Amendment of the market share analysis based on the revised Study Area and with correction of arithmetic errors.

We trust this review is sufficient for Council's consideration but please contact the undersigned if anything further is required.

Yours sincerely,



Jordan Musk
Director

Attachment 2 – EDQ Information Request



Department of
State Development and Infrastructure

Our ref: F24/217

Your ref: PDA/2023/5733

24 January 2024

Toowoomba Regional Council
Attn: Sophie Spencer
PO Box 3021
Toowoomba QLD 4350

Email: development@tr.qld.gov.au, sophie.spencer@tr.qld.gov.au

Dear Sophie

RELEVANT STATE INTERESTS FOR A PDA DEVELOPMENT APPLICATION FOR A PDA DEVELOPMENT PERMIT FOR A MATERIAL CHANGE OF USE FOR MULTIPLE DWELLING (56 UNITS) AND SHOPPING CENTRE AT 1A-3 NEIL STREET, TOOWOOMBA CITY DESCRIBED AS LOT 3 AG208, LOT 1 RP151665, LOT 5 RP16677, LOT 2 RP129701, LOT 1-3 RP16672 AND LOT 26-28 RP16674

Thank you for consulting with Economic Development Queensland (EDQ) about state interests relevant to the above PDA development application (the application).

After undertaking an assessment of the application, EDQ advises that:

The following information is necessary for EDQ to consider relevant state interests and should be requested via an information request in accordance with s83 of the *Economic Development Act 2012*:

A review of the material including the Traffic Impact Assessment (TIA), reference number 23E-0068, revision 1, prepared by RMA Engineers, dated 20/12/2023, has demonstrated that further information is required to adequately assess the proposed development. The applicant is requested to provide the additional information identified in **Appendix A**.

EDQ will advise further about state interests relevant to the application following receipt of the applicant's responses to the above items.

Should you have any queries in relation to this notice, please do not hesitate to contact Vivian Lun, Planner, Development Assessment, in Economic Development Queensland, by telephone on (07) 3452 6781 or at Vivian.Lun@dsdilgp.qld.gov.au.

Yours sincerely

A handwritten signature in black ink that reads "Leila Torrens".

Leila Torrens
Manager
Development Assessment
Economic Development Queensland
Encl.

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Brisbane Queensland 4001 Australia
Website www.edq.qld.gov.au
ABN 76 590 288 697

Appendix A

No	Information Required
Taxi Rank	
1.	<p>Issue:</p> <p>The development proposal relates to a shopping centre development with a total GFA of 6,039m², comprising a full-line supermarket of 4,293m² complemented by ground floor tenancies totalling 1,746m². This will generate taxi demand. Despite this, the Traffic Impact Assessment (TIA), prepared by RMA Engineers, dated 20/12/2023, reference number 23E-0068, revision 1 indicates that no public passenger transport provision has been made as part of the proposed development. In particular, the TIA and architectural drawing package, prepared by The Buchan Group give no consideration to taxis.</p> <p>Action:</p> <p>The development will trigger demand for a taxi rank and the applicant is required to provide revised architectural drawings and a revised TIA demonstrating that:</p> <ul style="list-style-type: none">(i) A taxi rank will be provided with sufficient capacity (the number of parked vehicles that can be accommodated) to cater for the demand generated by the development. This should consider likely passenger volumes and the demand for taxi services given factors such as the gross floor area of the development, use mix, anticipated demand, demographic considerations and regular uses/activities. In particular, the proposed full-line supermarket, is likely to generate taxi demand.(ii) The taxi rank will be located parallel to kerb adjacent to the main pedestrian entrance to the supermarket so that patrons do not have to cross vehicle circulation areas. Taxi ranks should be appropriately positioned to maximise coverage and decrease the distance that potential passengers have to walk. Taxi ranks should be sited near uses that generate major trips, the main pedestrian entry to the development and major pedestrian facilities. Taxi ranks should have their own dedicated parking bays and not be used for other pick-up and drop-off purposes. Advice is provided that the retail car park should be reconfigured to provide a taxi rank, parallel to kerb, adjacent to the lift and DDA ramp providing access to the entry of the supermarket building. Perpendicular car parking bays are not considered fit for purpose for a taxi rank.(iii) The taxi rank will be designed in accordance with relevant standards to ensure its safety and operational integrity as well as accessibility to people with a disability. Taxi ranks should be designed in accordance with appropriate standards. Taxi services provide an essential form of transport for those who cannot access other forms of transport or drive independently and are completely reliant on taxi services. Taxi ranks should have adequate support infrastructure such as waiting areas, shelter and seats. Please refer to Australian Standards AS 2890.5, AS/NZ 2890.6, AS 1742.11, AS/NZ 1158.3.1, the Disability standards for accessible public transport 2002 made under section 31(1) of the <i>Disability Discrimination Act 1992</i> and Chapter 7 – Taxi Facilities of the <i>Public Transport Infrastructure Manual 2015</i>. The taxi rank should include at least one space at the head of the queue suitable for a wheelchair accessible taxi. <p>Further guidance can be obtained from the Department of Transport and Main Roads' <i>TransLink Public Transport Infrastructure Manual 2015</i>, in particular Chapter 7 – Taxi Facilities, which is available at: http://translink.com.au/about-translink/reports-and-publications. In particular, please refer to the provisions for disability access in Section 7.5.</p> <ul style="list-style-type: none">(iv) Taxis circulating through the car park can manoeuvre in forward gear at all times and have a direct and efficient route between entry and exit that avoids car park congestion and circuitous routes.(v) The maximum design vehicle can circulate past parked taxis (maximum design vehicle – maxi taxi being a Toyota Hiace of 5.38m in length) in the taxi rank. This will be necessary for independent vehicle movement in car parks. A RPEQ certified swept path analysis

No	Information Required
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	should be provided demonstrating the path of travel through the car park, into and out of the taxi rank and also circulating past taxis parked in the taxi rank.
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Urban Bus Stop Pair	
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2.	
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Issue:

The development proposal relates to a shopping centre development with a total GFA of 6,039m², comprising a full-line supermarket of 4,293m² complemented by ground floor tenancies totalling 1,746m². The shopping centre will form an anchor on existing bus routes that will generate demand for a boarding/alight point.

Despite this, the Traffic Impact Assessment (TIA), prepared by RMA Engineers, dated 20/12/2023, reference number 23E-0068, revision 1 indicates that no public passenger transport provision has been made as part of the proposed development although it suggests bus stop provisions should be considered in Neil Street and as part of the wider network. Neil Street, however, only accommodates bus route 903.

Chalk Drive is currently serviced by routes 901, 902, 904, 905, 906, 907 and route 950 (outbound only) adjacent to the proposed development and Translink has advised from a networking perspective that a pair of bus stops should service the development along this frontage. A wider networking consideration is not required because the urban bus routes are existing and the nearest bus stops are too remote from the site to service the type and scale of development proposed. A shopping centre should have 'front door' access to urban bus stops.

Action:

The development will trigger demand for a new bus stop pair to service the development via the existing bus routes along Chalk Drive or Neil Street, south of its intersection with Chalk Drive. The applicant is therefore required to provide revised architectural drawings and a revised TIA demonstrating:

- (i) the location for a pair of urban bus stops (one in each direction) to service the proposed development on Chalk Drive or Neil Street, south of its intersection with Chalk Drive. In proposing a location for each bus stop, the applicant should give due consideration to the following:
 - The operational considerations for the planning and design of bus stops in Section 5.5 - Bus Stop Environment of Chapter 5 - Bus Stop Infrastructure of the *Public Transport Infrastructure Manual 2015* as well as to the *Transport Operations (Road Use Management – Road Rules) Regulation 2009*, in particular stopping at intersections. The bus stops preferably should be located on the departure side of intersections and in proximity to a safe pedestrian crossing arrangement.
 - Potential traffic hindrances and safety issues in locating the bus stops and determining whether the bus stops should be indented or on-road, for example, ingress/egress points, vehicle queuing, deceleration lanes, turn lanes, loading vehicles, sight lines and blind spots affecting potential bus drivers and pedestrians. Consultation should occur with the road manager (Department of Transport and Main Roads and Toowoomba Regional Council) in relation to relevant considerations for locating and designing the bus stops in the relevant speed environment and with regard to any roadworks required for the development.
 - Potential constraints such as stormwater drainage infrastructure, power poles, street furniture, vegetation, driveways, verge width, topography and the like in locating the bus stops.

It is acknowledged that Chalk Drive is constrained but the applicant is requested to consider potential alternative design solutions for bus stops given this roadway accommodates the majority of bus routes. Alternatively, the option of reallocating kerbside space to bus stops in Neil Street, south of its intersection with Chalk Drive can also be

No Information Required

considered as the majority of bus routes utilise this intersection inbound and outbound of the Toowoomba Bus Station. Neil Street, north of its intersection with Chalk Drive is not considered a suitable location for urban bus stops given this frontage only services one bus route.

- (ii) Provide a layout design for the proposed bus stops to an Intermediate stop standard in accordance with Chapter 5 – Bus Stop Infrastructure of the *Public Transport Infrastructure Manual 2015*. In particular, refer to Section 5.3 – Principles of Bus Stop Planning, Section 5.6.3.1 and Table 5.7 - Bus Stop Length Requirements, Section 5.7 – Bus Stop Components and Appendix 5-B – Layout and Technical Drawings. The positioning, design and dimensions of the proposed bus stops should be clearly depicted on a scaled and labelled proposal plan in relation to the requirements of the *Public Transport Infrastructure Manual 2015* and any proposed roadworks.
- (iii) Provide written evidence that relevant land owner/s do not object to the proposed location of the bus stop/s, where these need to be located adjacent to the road frontage of a different site (that is, where not adjacent to the subject site).
- (iv) Demonstrate how safe, direct and convenient pedestrian/cycle access will be provided between the proposed development and each bus stop by:
 - undertaking consultation with the relevant road manager (the Department of Transport and Main Roads / Toowoomba City Council);
 - undertaking a safety audit which considers the locational circumstances of the site, proposed traffic arrangements, the intended location of the bus stops, the anticipated site population and speed environment of the road as well as other relevant considerations;
 - providing an appropriately labelled and scaled drawing illustrating a suitable pedestrian crossing arrangement across the applicable roadways to achieve access between the proposed bus stops and development;
 - providing a paved pedestrian footpath adjacent to the road frontages of the site;
 - providing a proposal plan which demonstrates how an internal pathway system will be provided to facilitate access to the external pedestrian network providing access to the bus stop pair.

The Department of Transport and Main Roads' TransLink *Public Transport Infrastructure Manual 2015* is available at: <http://translink.com.au/about-translink/reports-and-publications>.

The applicant is encouraged to meet with the Department of Transport and Main Roads to discuss potential bus stop locations.