

15 June 2026

Attention: Emily Hinchliffe
Toowoomba Regional Council
PO Box 3021
Toowoomba Village Fair QLD 4350

Via email: Emily.Hinchliffe@tr.qld.gov.au

RECEIVED
15/06/2026
**TOOWOOMBA
REGIONAL COUNCIL**

Dear Emily,

**RE: RESPONSE TO INFORMATION REQUEST (RAL/2025/5992)
 SECTION 13.2 OF THE DEVELOPMENT ASSESSMENT RULES
 MERINGANDAN ROAD, MERINGANDAN QUEENSLAND 4352**

We act on behalf of KDL Property Group Pty Ltd, the Applicant in relation to a Development Application lodged with Toowoomba under the *Planning Act 2016* (the Planning Act) over the above land seeking:

- Development Permit for Reconfiguration a Lot – Two (2) Lots into 199 Lots and Two (2) Balance Lots in Five (5) Stages.

On 13 October 2025 we received an Information Request from Toowoomba under Part 3 of the *Development Assessment Rules* (DA Rules). In accordance with Section 13.2 (a) of the DA Rules, we now provide a response to all of the information requested.

In support of our response, we provide the following attachments:

- | | |
|---------------------|---|
| Attachment A | Amended Proposal Plans & Plan of Development |
| Attachment B | Amended Structure Plan & Parks Assessment |
| Attachment C | Traffic Response (L+R) |
| Attachment D | Response to Servicing Items (Burchills Engineering) |
| Attachment E | Amended Engineering Assessment Report & Plans |
| Attachment F | Amended Stormwater Management Plan |

In response to the request, and as further detailed below, we note that the proposed development has been amended as follows:

1. Adjustment to the Stage 1 boundary to incorporate a basin;
2. Reduction to road dedication along Main Street;



3. Removal of the previously mapped State waterway ('waterway barriers work - low risk');
4. Inclusion of an 18m wide road between Stage 1 and 4;
5. Inclusion of bin pads for specific lots; and
6. Minor changes to lot sizes and frontages to accommodate the above changes.

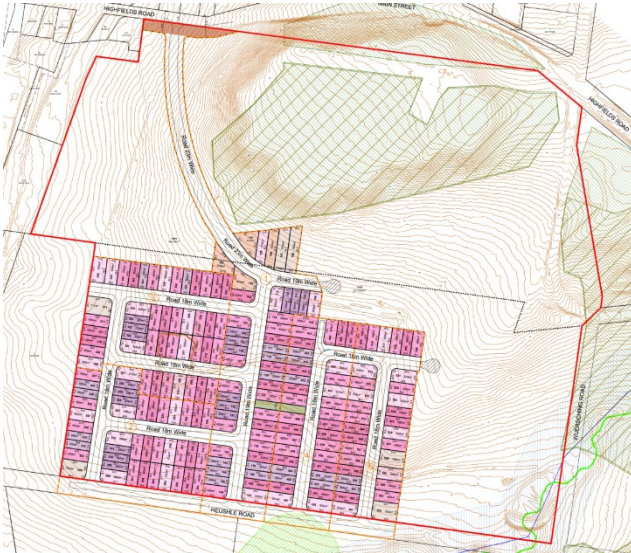


Figure 1: Lodged Plans

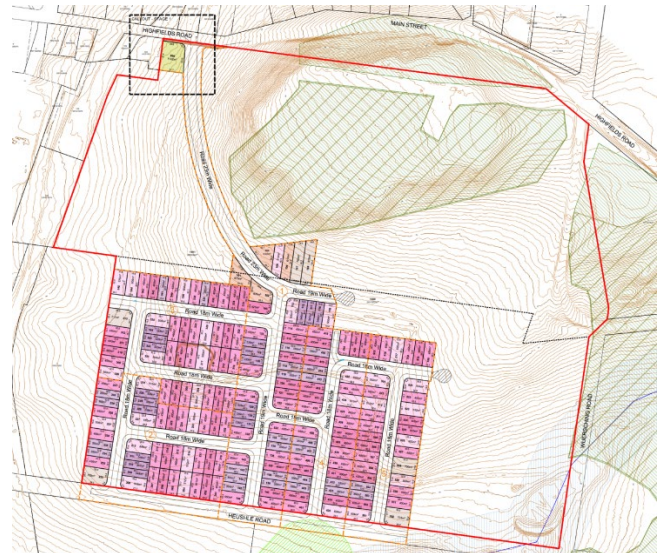


Figure 2: Proposed Plans

In accordance with Schedule 2 of the *Planning Act 2016* (the Act) and Schedule 1 of the *Development Assessment Rules*, we confirm that the above changes do not:

- result in a substantially different development;
- seek approval for prohibited development;
- require the application to be referred to any additional referral agencies; or
- change the type of development approval sought.

A response to each item of Council's Information Request is included below.

Response to Information Request

1. Lot Layout

1.1 Issue: The proposed layout does not provide for any safe alternative access, inconsistent with the *Reconfiguring a Lot Code*. A subdivision of this scale is required to be provided with at least two (2) fully functioning connections to the road network.

Information Required: Provide amended plans which establish a second road connection to the constructed external road network.

Note: Refer also to items 2 and 6 of this Information Request where responding to this item.



Response: The applicant acknowledges Council's comments regarding the need for an additional connection to the external road network to ensure safe and efficient access.

Consideration has been given to opportunities for providing a second fully functioning road connection. However, this is not feasible at this stage due to the numerous environmental and physical constraints affecting the site and adjoining land area.

Given these constraints, the applicant proposes maintaining an emergency access track extending north to Main Street / Highfields Road, generally following the alignment of the existing informal dirt track (**Attachment B**). This connection would provide emergency and service vehicle access if required but would not operate as a full public connection.

The applicant considers that this approach appropriately responds to the site's constraints while maintaining a satisfactory level of accessibility and safety for future residents and any emerging services. The additional connections to the broader network can be facilitated as additional development opportunities emerge in the sites surrounding (e.g. complete construction and connection of Heushle Road to existing road networks).

Please refer to the Traffic Response prepared by L+R for further details and support of this proposed outcome (**Attachment C**).

1.2 Issue: *The lot layout results in long block lengths particularly along the western side of Stages 2 and 3 and between Stages 1 and 4.*

Information Required: *Provide amended plans which:*

(a) Provide a mid-block road connection to adjoining land to the west; and

(b) Replace the pedestrian connection between Stages 1 and 4 with a road connection.

Response: As per Council's request (Item 1.2 (b)), the pedestrian connection between Stages 1 and 4 has been replaced with an 18m wide road connection to facilitate additional access to Stages 4 and 5, and support efficient transport movements across the development (**Attachment A**).

Regarding Item 1.2 (a), it is noted the block length along the western side between Stages 2 and 3 is approximately 236m in total length and as such, is within the maximum block length requirements of 250m set by the *Planning Regulation*. Further, a road connection to the adjoining land to the west is already provided via a proposed 18m wide road. On this basis, no mid-block road connection has been provided. Please refer to the amended Proposal Plans and Traffic Response for further details (**Attachment A** and **Attachment C**).



1.3 Issue: *The layout of Lots 415-419 is heavily constrained with the proposed bin pads restricting the ability for driveway crossovers, street trees, street lighting and other road furniture to be appropriately established as anticipated within the Reconfiguring a Lot Code.*

Information Required: *Provide amended plans which extend the 8m wide road within Stage 4 through to the North to connect to "Road 1".*

Response: Council's request to extend the road north is acknowledged. However, the proposed road layout and associated bin pad arrangement for Lots 415 to 419 provide a sufficient and appropriate design outcome for this location.

As demonstrated within the amended Proposal Plans (**Attachment A**), the indicative driveway crossover locations remain unaffected by the bin pad placement. The pads have been purposefully positioned to avoid conflict with vehicle access while still providing a compliant waste collection arrangement. In addition, the proposed configuration maintains adequate verge width to accommodate street trees, underground/above-ground services, and other necessary streetscape elements.

Overall, the solution achieves a balanced and functional road and verge design that enables driveway crossovers, street trees, street lighting, and other road furniture to be established in accordance with the Reconfiguring a Lot Code.

1.4 Issue: *It is unclear how lots 344 and 345 can be serviced by a waste collection vehicle in forward gear as no turnaround has been provided.*

Information Required: *Provide amended plans which demonstrate how Lots 344 and 345 can be appropriately serviced by a waste collection vehicle.*

Response: Bin pads have been proposed for Lots 344 and 345 to ensure they can be serviced by a waste collection vehicle in forward gear. Please refer to the amended Proposal Plans and Traffic Response for further details (**Attachment A** and **Attachment C**).

1.5 Issue: *It is unclear how Lots whether proposed Lots 107 and 108 have appropriate dimensions to support Dual Occupancy development, particularly given they have frontages of only 14m.*

Information Required: *Provide amended plans which ensure that lots proposed to be designated for Dual Occupancy development have appropriate road frontage, with particular consideration given to vehicular access and car parking requirements.*



Note: Dual Occupancies may be better established elsewhere within the proposed subdivision where lots can be provided within the proposed subdivision where lots can be provided with wider or dual road frontage/s.

Response: Whilst Councils position is acknowledged, proposed Lots 107 and 108 can both adequately support a Dual Occupancy. In accordance with AO56.1 (Reconfiguration a Lot Code), Lot 107 and 108 both exceed the minimum requirements of 700m² for a Dual Occupancy within the Emerging Community Zone. The lots (as currently proposed) ultimately have sufficient area, shape and dimensions to suitably accommodate their intended use as a Dual Occupancy.

1.6 Issue: *Retaining walls in order of 3m in height are proposed along lot boundaries (including along northern lot boundaries) impacting on the ability for future residential development to be provided in a manner that protects the amenity, privacy and solar access of future residents.*

Information Required: *Provide amended plans which reduce the height of retaining walls between lot boundaries.*

Note: Consideration should be given to incorporating wider/deeper lots to allow for stepped retaining which is provided in accordance with SC6.2 PSP No. 2 – Engineering Standards – Roads and Drainage Infrastructure.

Response: Please refer to the formal response to Item 1.6 provided by Burchills Engineering (Attachment D).

1.7 Issue: *Retaining walls in the order of 2m in height are proposed adjoining road reserves and pedestrian links throughout the subdivision resulting in poor streetscape and CPTED outcomes inconsistent with Performance Outcome PO1 of the Reconfiguring a Lot Code.*

Information Required: *Provide amended plans which demonstrate that appropriate interface is provided between retaining walls, pedestrian connections and street frontages.*

Note: Consideration should be given to incorporating wider/deeper lots to allow for stepped retaining to be provided in accordance with SC6.2 PSP No. 2 – Engineering Standards – Roads and Drainage Infrastructure.

Response: Please refer to the formal response to Item 1.7 provided by Burchills Engineering (Attachment D).



2. Infrastructure Network Analysis

2.1 Issue: The proposed development is located outside the Priority Infrastructure Area (PIA) meaning that necessary trunk infrastructure has likely not been planned for in Council's LGIP or network planning. Insufficient detail has been provided in relation to the infrastructure network required to facilitate this development to assist Council in determining and identifying necessary infrastructure to service the growing community.

Information Required: Provide an Infrastructure Network Assessment report (with supporting information, maps and metrics) for four of the infrastructure networks (stormwater, sewer, water and transport) addressing, but not limited to, the following

- (a) Identification of the most cost-effective method to extend trunk infrastructure networks from the PIA to and through the development site (including estimation of costs of this infrastructure). Please refer to Part 4.2 of the Toowoomba Regional Planning Scheme 2012 for guidance. This must also include assessment of the cumulative impacts of the full site including balance lots, other approved development, current applications and future development areas outside the PIA;
- (b) An assessment of the capacity of existing and future trunk infrastructure identified in the LGIP to determine whether adequate capacity exists to accommodate the development;
- (c) Identification of any necessary trunk infrastructure identified in the LGIP and that that will be made necessary by the development (including and estimation of costs of the infrastructure);
- (d) Identification of any extra trunk infrastructure which will be made necessary by the development (including and estimation of costs of this infrastructure);
- (e) Identification of any non-trunk infrastructure which is required to connect the development to trunk infrastructure networks (refer to Planning Scheme Policies for guidance);
- (f) Commentary regarding the ability to achieve the desired standards of service for each infrastructure network as identified in the LGIP; and
- (g) The timing and sequencing of the infrastructure (noting that the development is proposed to be staged).

Note: The infrastructure Network Assessment report must be prepared by an appropriately qualified RPEQ relevant to the network type.

The Infrastructure Network Assessment report may be used to determine if any extra payment should be imposed on the development. It is recommended that the applicant be sufficiently satisfied that they are able to address the above issues and the preceding Information Request item, prior to proceeding to respond to all other items in this Information request.



An example of the standard of documentation required for the technical reports for each network can be found within the Special Meeting of Council Minutes for RAL/2021/7453 which is available on Development.i.

Response: Please refer to the formal response to Item 2.1 provided by Burchills Engineering (Attachment D) and L+R (Attachment C).

3. Water Supply

3.1 Issue: As the proposed development area is outside of PIA, no demand from this site has been included in previous water supply studies. The submitted Water Supply Network Assessment undertaken by WCS Engineering considered water demand from 199 lots but not the balance of the site and other sites outside the PIA. The Water Supply Network Assessment includes technical pre-lodgement advice from Council that hasn't been addressed including:

- (a) That the existing network does not have sufficient capacity to support the full site development without augmentation works;
- (b) There are no details about the augmentation works required (e.g. increased sizing of trunk infrastructure due to additional demand) and the cost of such works; and
- (c) The engineering plans in the Preliminary Civil Engineering Report show a connection to an existing 150 diameter trunk watermain in Main Street which is not the connection point nominated by Council.

Information Required: In conjunction with the Infrastructure Network Assessment, provide an updated Water Supply Network Assessment demonstrating that a compliant water supply system can be provided including assessment of full development of the site with the cumulative impacts of other approved development, current applications and future development areas outside the PIA.

The report is to demonstrate, as a minimum, modelling hydraulic results demonstrating pressure and flows with required pipe sizing, the different pressure zones required, the proposed connection points, and the external augmentations required (including costings) to service the full development site. The water supply report is to be undertaken in accordance with Council's Water Infrastructure Policy 2.03.

Response: Please refer to the formal response to Item 3.1 provided by Burchills Engineering (Attachment D).

4. Wastewater

4.1 Issue: As the proposed development area is outside the PIA, no sewerage planning study has been undertaken for this area. The submitted Wastewater Network



Assessment undertaken by WCS Engineering assumes full development of the site but not other sites outside the PIA. A gravity sewer connection is proposed to a new pump station at the unformed Heushle Road which then directly feeds into Council's existing sewer pressure main located on the western side of the development. Council does not support an arrangement which has direct pumping into a rising main due to potential maintenance issues. Technical pre-lodgement advice from Council was that connection would be made to the existing sewer pump station (HIPS8) at Meringandan School Road in the interim and a new sewer pump station proposed at Spies Road. Both connection points will impact the capacity and operation of HIPS8 and the downstream pump station HIPS13. The development demand represents a significant portion of available capacity at HIPS8 and the Spies Road pump station and the pumped network does not have long-term capacity to cater for the full development demands of the Subject Site.

There is a concept services layout provided within the Engineering Report but no details about pipe size and long-sections, how Lots 419 to 520 will be connected, nor how the balance lots will be connected.

Further, the Town Planning Report requests dispensation for sewer main greater than 4m deep. This is unacceptable to Council given the small size of the lots and workplace health and safety issues associated with deep excavation.

Information Required: In conjunction with the Infrastructure Network Assessment, provide a detailed wastewater report demonstrating that a compliant conventional gravity system can be achieved to service each lot in the development including the balance lots. The report must demonstrate how this can be achieved by indicating the connection points, adequacy of downstream sewer from proposed connection points (including any pump stations), ultimate loads from the development and sizing of the mains throughout all stages as a minimum. The report is to be undertaken in accordance with Council's Wastewater Infrastructure Policy 2.04.

Note: Note: Council does not support an arrangement which has direct pumping into the HIPS8 rising main.

The concept sewer layout needs further development to confirm all sites can be provided with a gravity connection with the maximum depth of gravity sewers limited to 4m.

Response: Please refer to the formal response to Item 4.1 provided by Burchills Engineering (Attachment D).

5. Stormwater



5.1 Issue: The proposed development area is outside of PIA and no planning study has been done for the urbanisation of this area. The Meringandan Urban Stormwater Master Plan does not anticipate this intensity of development within the Subject Site. The submitted Conceptual Stormwater Management Plan prepared by Burchills, needs to address the following issues:

- (a) Council does not support the proposed construction of an open channel along Heushle Road reserve for the following reasons:
- i. The proposed open channel will restrict the future development of land south of Heushle Road, and
 - ii. The steep terrain along the western extent of Heushle Road reserve, combined with the proposed flows, present a high risk of future scour and erosion of an open channel;

Note: Council understands that the Meringandan USMP does propose open channels to discharge to the west, however this plan was development in 2019 and does not consider the high-density development currently proposed and occurring in the surrounding area. Additional catchment planning and stormwater design has been undertaken since the development of the USMP and therefore this USMP may not reflect the most up to date assumptions for the catchment.

- (b) The SMP proposes no on-site detention, however there are significant increases in stormwater flows at multiple discharge points;

Note: Council is aware of drainage concerns along Main Street and are currently in the process of updating the flood modelling for this area. There is no additional stormwater capacity within the road.

- (c) Council has concerns regarding the assumed fraction impervious values given approximately 45% of lots are proposed to be 400m² or less. A fraction impervious of at least 80% should be used for residential lots; and
- (d) There is no stormwater quality treatment proposed. As outlined within the pre-lodgement advice, stormwater quality treatment must be provided that meets the post-construction design objectives for water quality within the State Planning Policy July 2017. Stormwater treatment facilities must be located in drainage reserves or streets with provision made for maintenance access. Treatment facilities could include street tree bio-retention pods, grass swales, and bio-retention filers.

Information Required: In conjunction with the Infrastructure Network Assessment, provide an updated Conceptual Stormwater Management Plan, prepared having regard to Toowoomba Regional Planning Scheme 2012 and in accordance with the requirements of PSP No. 2 – Engineering Standards – Roads and Drainage Infrastructure (PSP No. 2) and the Queensland Urban Drainage Manual (QUDM), which includes, but is not limited to:



- (a) Demonstration that the post-development peak flows will not exceed pre-developed peak flows from the site for storm events with an ARIs from 2 years up to and including 100 years. That is, there is “no-worsening” effect as a result of this development on upstream, downstream, adjoining and nearby properties including roads;
- (b) A fraction impervious of at least 80% should be used for residential lots;
- (c) No open channel on Heushle Road and restriction of development on the southern side of that road; and
- (d) Stormwater quality treatment that meets the design objectives of the State Planning Policy

Response: Please refer to the formal response to Item 5.1 provided by Burchills Engineering (Attachment D).

6. Transport

6.1 Issue: The Proposed Development area is outside the PIA and no transport planning has been done for this area. The Traffic Impact Assessment presented with the application has only considered traffic generation from 199 lots and not the balance of the site and other sites outside the PIA. The Traffic Impact Assessment:

- (a) Has not followed the methodology within the TMR Guide to Traffic impact Assessment addressing the road safety, access and frontage, road link capacity and intersection delay impacts of the development;
- (b) Has not considered the cumulative impacts of other approved development, current applications and future development areas outside the PIA;
- (c) Assumes a year of opening at 2027 which seems unrealistic given this needs to coincide with the last stage of development, likely to be well beyond 2027;
- (d) Hasn't considered a street hierarchy especially with respect to access connections to development sites west and south of the subject site;
- (e) Assumes 100% of all development traffic will travel to the east which is unrealistic given there is an existing school to the west, existing and approved retail development to the west, and the west provides the most direct access to Western Toowoomba and the employment opportunities in this area;
- (f) Has not recognized the constraints of the site with respect to road dedication requirements on Main Street;
- (g) Has not demonstrated how maximum speeds on local access streets will be controlled given here are some local access streets up to 280m in length without any curve restraints and
- (h) Has no considered walk and cycle connection.

Information Required: In conjunction with the Infrastructure Network Assessment, provide a traffic impact Assessment (TIA) consistent with the methodology outlined in



the TMR Guide to Traffic Impact Assessment and addressing the road safety access and frontage, road link capacity and intersection delay impacts of the development. In particular the TIA should consider;

- (a) Assessment of the cumulative traffic impacts of development from the Subject Site (including balance lots) plus other approved development, current application and future development areas outside the PIA;
- (b) The spatial extent should include intersections where development traffic exceeds 5% of base traffic for any movement in the design peak period for the final stage of opening;
- (c) Traffic growth on the major roads will need to be agreed with Council;
- (d)) The street hierarchy required for the reconfiguration with connectivity to the surrounding areas (developed and undeveloped);
- (e) An assessment of attractors of trips from the Subject Site recognising existing schools, existing and approved retail development to the west, and the west provides the most direct access to Western Toowoomba;
- (f) Turn warrants required at Main Street/Development Access including an intersection layout recognising existing services and pedestrian connectivity. The 14.1m proposed road dedication on Main Street is excessive given the constraints of the site;
- (g) How to control speeds on local streets; and
- (h) Walk and cycle connections both within and external to the Subject Site. Footpaths on internal streets must be provided in accordance with PSP No 2 and this includes footpaths on both sides of local access streets (> 75 lots) and collector streets.

Response: Please refer to the formal response to Item 6.1 provided by L+R (**Attachment C**).

7. Earthworks

7.1 Issue: While cross sections of earthworks have been provided, no information regarding the depths of cut and fill has been included.

Information Required: Provide annotated cross sections showing cut and fill heights and batter slopes.

Response: As per Councils request, please refer to the annotated cross sections prepared by Burchills Engineering (**Attachment D**).

8. Open Space Requirements

8.1 Issue: The site is located outside of the PIA boundary and as such open space requirements have not been planned for the subject site, The submitted structure plan identifies a small portion of open space in the far south- east corner of the subject site



that adjoins the waterway, to service the subdivision the subject of this application, however this has not been included within the development are. Further, it is unclear if this land satisfies the requirements of the Desired Standards of Service (DSS) for landform as identified in Council's endorsed Extrinsic Materials Report for Parks Network.

Information Required: Provide amended plans which include:

- (a) The proposed open space in the south-eastern corner of the subject site to be provided as part of this application;*
- (b) The size of the proposed open space land parcel including the flood immunity and gradient as required in the DSS;*
- (c) Provision of a road connection between the development area and the open space; and*
- (d) Road frontage along the full extent of the western boundary of the open space parcel.*

See section 4.4.6 of the Toowoomba Regional Planning Scheme 2012 for further details of the DSS for Park Spaces.

Response: Council's comments regarding preferred open space requirements and the request for amended plans are acknowledged.

While noted, it is important to clarify that the Structure Plan submitted with the application identified an indicative open space area in the south-eastern corner of the site for conceptual purposes only. Its intent was to demonstrate how future stages may interface with the drainage corridor and illustrate potential opportunities for open space integration across the broader development area. This land was not proposed for dedication, or embellishment as part of the current application, which relates solely to the initial development area (Stage 1 to 5).

At this time, the applicant does not propose to amend the submitted plans to include open space dedication or associated road access. The form, function, and staging of open space for the balance area of the site will be more appropriately considered as part of future development applications, where the full development layout, drainage outcomes, and interface designs can be assessed holistically and in further detail.

Future applications will address open space design, location, and delivery in accordance with the Desired Standards of Service (DSS) identified in Council's endorsed Extrinsic Materials Report for the Parks Network, as well as the requirements of section 4.4.6 of the *Toowoomba Regional Planning Scheme 2012*.

Accordingly, the applicant requests that detailed consideration of open space provision be deferred to a subsequent application, ensuring that the ultimate open space outcome is planned comprehensively, aligns with Council's network planning objectives, and reflects the full development context of the site.



In addition to the above, it is noted the structure plan has now been updated to remove the previously mapped State waterway ('waterway barriers work - low risk') originally transferring through the south-east corner of the subject site. On 28 November 2025, the Department of State Development, Infrastructure, and Planning (DSDIP) provided an update to the Development Assessment Mapping System (DAMS), specifically the 'Queensland Waterways for Waterway Barrier Works' mapping layer.

As part of this amendment, the previously mapped State waterway was removed and as such, is no longer a relevant consideration (at State level) for the structure planning of this development nor any future development application over the subject site.

Summary


We offer this as a response to all of the information requested in Council's Information Request. As required by Section 14.1 (a) of the DA Rules, we advise that Council is to proceed with its assessment of the application.

In fulfilment of our obligations under Part 4 of the DA Rules, we will now arrange for public notification to be carried out for a period of 15 business days.

Should any clarification be required, please contact me on (07) 3251 9483 or email at jeremygoodsell@saundershavill.com.

Yours sincerely

Saunders Havill



Jeremy Goodsell

Town Planner

