

Our Ref: BE250269 – Traffic Engineers - Negotiated Decision Notice Rev A  
Enquiries to: Dale Kleimeyer

11 May 2026

As per Condition 6A, this document is approved to the extent of the endorsed vehicle mode share only.

Anita Schriek  
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PO Box 764  
TOOWOOMBA QLD 4350

**Attention: Anita Schriek**

Dear Anita,



**Re: Development Approval for Material Change of Use - Impact - Rooming Accommodation and Food and Drink Outlet at 125 Kudo Silverleigh Road Goombungee, QLD 4354. Property Description: Lot 2 RP50559. Relevant Planning Scheme: Toowoomba Regional Planning Scheme 2012**

We refer to Condition 35A of the Decision Notice and the corresponding Delegated Authority Report as per below extract.

**DECISION NOTICE - ROADWORKS (EXTERNAL TO DEVELOPMENT)**

**35A Existing roads must be upgraded for as follows:**

**Street: Gordon Smiths Road**  
**Classification: Local Access Rural**

Construction Standard: The road must be upgraded to 3.5m seal on 6.5m formation as per IPWEA Low Order Road Design Guidelines. The road must be upgraded from Kingsthorpe-Haden Road/Gordon Smiths Road intersection to the driveway crossover of the property.

**Note: This condition is imposed pursuant to Section 145 of the Planning Act 2016.**



Council's Delegated Authority Report & Statement of Reasons for the current approval (MCUI/2017/6050/H): Issue 5 Traffic Impact Assessment is shown as follows:

<p><b><u>Issue 5 – Traffic Impact Assessments</u></b></p> <p>Concerns were raised that the Traffic Impact Assessment does not accurately reflect existing or potential traffic volumes and fails to consider the limited width, poor condition and wet-weather performance of Gordon Smiths Road. Increased traffic from the development may exceed the road's capacity, create safety risk and require upgrades that have not been assessed or addressed.</p>	<p>Council Engineers have reviewed the submitted Traffic Impact Statement (TIS).</p> <p>The submitted TIS states the traffic generation from the proposed development is 56 vpd in addition to 24 vpd from the existing development, which totals to 80 from the development.</p> <p>The existing pavement width of Gordon Smiths Road is 3.0m, which is lower than the road standard to accommodate 10 to 100 vpd, for which the required pavement width is 6.0m on 8.0m formation as per Council's Standard Drawing 101386-001 Regional Road Standard – Rural Roads.</p> <p>A road upgrade is required to accommodate additional traffic volume of 56vpd generated by the development. However, given the nature of the development, a lower road standard is recommended in line with IPWEA Low Order Road Design Guidelines.</p> <p>Conditions of approval have been recommended on the proposed development to upgrade Gordon's Smith Road to Council's Local Access Rural standard.</p>
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## 1. FURTHER RESPONSES TO ISSUE 5 - GORDON SMITHS ROAD UPGRADE AS FOLLOWS:

### 1.1 Existing and Potential Traffic Volumes including Background Growth Projection

As per the Information Request, the traffic impact assessment followed the requirements of the Department of Transport and Main Roads Guideline. The assessment is based on the traffic volumes for the year of opening, which yielded traffic volumes less than those required to upgrade the road cross section. Council contended that the background traffic growth would be significant and may exceed the threshold limit for the road upgrade. The assumption that the background traffic may exceed the existing road capacity is not justified and does not warrant the road upgrade, which is a significant cost burden for the project.

The existing background traffic catchment is primarily rural properties, some without houses. Trip rates are fixed and follow a daily pattern. Unless subdivision or a change in land use occurs within the catchment, no increase in background traffic occurs. Both of which are highly unlikely as a result of the lands' zoning and usage. Gordon Smiths Road is relatively short and forms part of a rural road network grid, where alternate routes are available to the Warrego Highway or Toowoomba CBD. Other similar rural roads in south east Queensland typically show growth rates from negative up to 1% per annum. Adopting these values for the background traffic growth results in a nil increase in background traffic.





The condition to upgrade Gordon Smiths Road because the background growth may (as stated by Council) exceed the threshold limit, is not sufficient justification to upgrade the road. Council initially relied upon the standards (i.e. 100 VPD) typical access road cross section to justify a road upgrade requirement. This has changed in the Decision Notice referring to the road standards for IPWEA *Low Order Road Design Guidelines*.

## **1.2 Capacity of Existing Gordon Smiths Road along Section from Kingsthorpe Haden Road up to the Development Property Boundary and Driveway Entrance**

The alignment of Gordon Smiths Road is straight providing excellent visibility along the section from Kingsthorpe Haden Road up to the development property boundary and driveway entrance. The Traffic Assessment Report calculated an ADT of 90 vehicles per day for the development, including the background traffic as a worst case scenario. Which equates to 4 vehicles per hour on average in one direction. That represents one trip every 15 minutes, which provides a very low probability of two cars passing on the 1.2km section of road up to the intersection.

The existing formation provides a raised pavement and formations with table drains either side, generally in accordance with a rural access standard cross section (from IPWEA Low Order Road Design Guidelines). Gravel roads and pavement depths requirements are determined by heavy vehicles only. The development traffic will primarily involve light vehicles and no increase in heavy vehicle use is anticipated with the development since the existing waste collection, for example, will occur at the same time and frequency as per the facility's current requirements. The existing gravel and formation is adequate for the frequency of vehicles occurring. Since no increase in heavy vehicle trips is expected, no disproportionate increase in pavement maintenance is expected to result from the development. As the probability of two cars passing on the section of road is virtually nil, the pavement and formation width is sufficient for two cars to pass.

With respect to the formation and pavement width the table from the Toowoomba Region Rural Road Design Standards details the road dimensions. The Local Access bitumen sealed and Local Access gravel formation widths are the same. The pavement width increases from 6.0 metres for the Local Access gravel to 8.0 metres for the Local Access bitumen seal. However, with respect to the Decision Notice conditions, Council have referred to the IPWEA publication that requires a formation width of 6.5 metres and a pavement and seal width of 3.5 metres.

The Planning Report for the development Application extensively addresses the width of Gordons Smith Road in Appendix D of the report. The pavement width ranges from a minimum of 6.03 metres near the entrance to 7.41 metres measured from aerial photography at 8 locations. The average pavement width is 6.4metres. On the basis of this information, the current standard complies with the Local Access Standard Gravel 10 to 100 AADT, and any upgrade is unjustified. The minimum 6.0 metre pavement width is sufficient for a car and truck to pass.

## **2. TRAFFIC SURVEY RESULTS**

As per the previously submitted Burchills traffic report, traffic volumes for the development were determined through measuring the traffic generated by the existing development. The traffic survey performed over a 24hr period on a typical weekday (during school terms) measured the background traffic along Gordon Smiths Road and the traffic entering leaving the existing development. Noting also that the traffic survey was conducted during the week of "Farmfest", which likely resulted in traffic volumes higher than would be normally expected.





### 3. EXISTING DEVELOPMENT

The traffic generated contributing to the existing development consisted of:

- The existing residence and caretaker's residence;
- The food and dining hall - external patrons; and
- The accommodation buildings containing six (6) guest rooms.

As per the traffic report, the 24 hour traffic survey counted 24 trips (12 entering and 12 leaving) for the development throughout the entire survey period.

#### 3.1 Traffic Generation Rates/Numbers for the Other Existing and Approved Uses On Site Individually – i.e. “Dwelling House” Use, “Caretakers Accommodation” Use

Further assessment of the trip generation rates that apply to each component of the existing development is assessed by individually assigning existing trips recorded from the traffic survey: The RTA publication gives trip rate references for residential buildings. The standard rate for a rural residence is 7.4 trips per dwelling for regional areas. Reference TfNSW Technical Direction Guide to Traffic generating developments TDT2013/04A.

To estimate the development trips for the residences - 15 trips per day for the existing residence and caretakers combined requirements was applied.

#### 3.2 The Traffic Generation Rates for the Existing and Approved “Rooming Accommodation” Units.

The facility does not operate as a conventional motel or resort with respect to traffic generated by guests. The occupants/residents of the “Rooming Accommodation” development use the private and weatherproof areas available on site for private activities such as exercise, meditation, reading, etc. Exercise activities will occur within the ‘Activities Buildings’ and shower areas will also be provided within the new ‘Activities Toilet’ buildings. As per the existing use, the proposed “Rooming Accommodation” uses are for resident guests who will stay for periods measured in months (not days or weeks) and they would rarely leave the premises (‘Monastery’ style use). The purpose of the ‘Monastery’ style living is for residents to be able to enjoy an isolated and quiet lifestyle of meditation, self-education and reflection etc. in a rural setting where flora and fauna can be quietly enjoyed in all forms (agricultural and natural) without ‘distractions’ from, and with minimal interaction with the ‘outside world’.

As part of the rooming accommodation in the new buildings, the owners will provide and operate a ‘Communal’ bus/van service for Residents of the Rooming Accommodation (Monastery). Consequently, guests will not arrive/depart the premises using their own car/s, but instead they will be taken to the site, and taken from the site (including for any day trips, Doctor’s visits, etc) via the communal bus.

The above existing and proposed site transport operations also encourage public transport use by providing transport for guests to / from the site to the public transport hubs within Toowoomba. General details of the available public transport available include:

- Toowoomba Bus station located in the city centre Chronicle Lane / Neil Street frequented by Greyhound, Murrays and other coaches. Express coach services available from Brisbane offering many departures daily. Typically, 5 to 12 buses per day. Journey time from Brisbane is 1 ¾ hours. Running from 5.30am until 6.00pm daily; and
- Toowoomba Well Camp Airport, frequent flights to / from Sydney at least one per day. Other flights also available to Brisbane.





### 3.3 Traffic Generation Rates/Numbers for the Approved Food and Drink Outlet Use.

In Council's Delegated Authority Report & Statement of Reasons for the previous Change (Other Change) approval (MCUI/2017/6050/F): Issue 1 Road trip generation assumptions are as defined in the previous assessment for the food and drink outlet detailed as follows:

<p><b>Issue 1 - Road Trip Generation Assumptions</b></p> <p>Concerns in relation to the adverse impacts from the estimated traffic movements that would be triggered from the proposed Food and Drink Outlet.</p>	<p>Council Engineers have reviewed the submitted Traffic Generation Assumptions. The traffic generation rates are based on Road Traffic Authority (RTA) NSW "Guide to Traffic Generating Developments" (Version 2.2, October 2002).</p> <p>A thorough assessment in relation to the "Estimated Highly conservative Trip rates for a 'restaurant' in rural Area" included the estimated trips per day based on different percentages (i.e. 80% of RTA Predicted Maximum Rates, 60% of Patrons/customers from off-site sources and 40% of Patrons from off-site sources). Council Engineer's assessment has determined that these rates are conservative and acceptable for modelling traffic impacts. Adopting these traffic generation rates; the proposed development will not result in significant additional traffic impacts or cause adverse traffic impacts on the existing road networks.</p>
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As per the assessment and alternate trip generation rates adopted by Council as obtained from the RTA Guide to traffic generating developments, Council concluded that based on the 80% of RTA predicted maximum rates traffic impacts associated with the food and drink outlet, the proposed restaurant will not result in any significant additional traffic or cause adverse traffic impacts on the existing road. Under the previous approval incorporating the approved "Food and Drink Outlet" use with other existing uses on site, accepted an ADT of between 77 to 98 trips per day without requiring any form of road upgrade or the provision of a Traffic Impact Assessment Report from an RPEQ to demonstrate otherwise. Noting further that the subsequent Traffic Report prepared by Burchills incorporating the Traffic survey in Gordons Smiths Road has since demonstrated significantly lower trips per day along Gordon Smiths Road from the proposed/approved development and background traffic numbers.

#### 4. CAR PARKING REQUIREMENT

Currently there are 30 car spaces on site including 1 PWD space. Car parking increases by 13 spaces including 2 PWD spaces. Overall, the development will provide 43 car spaces including 3 PWD spaces and excluding the covered car parks for the existing residences. Condition 36A details the number of car spaces required copied as follows:

##### ON-SITE CAR PARKING, SERVICE BAYS & MANOEUVRING

36A. The premises must be provided with minimum of **forty-three (43) ~~thirty (30)~~** on-site car parking spaces inclusive of **One (1) ~~three (3)~~** PWD car parking space, together with standing and manoeuvring for SRV service vehicles. Car parking and manoeuvring areas at a minimum must be:





As per the Toowoomba Region Transport and Access Code, 1 car space per two units is being supplied. The car parking supplied is not an indication of the number of vehicles movements applicable on a daily basis. The 60 x people will utilise the communal bus to enter/leave the site.

## 5. THE TRIPS GENERATED FOR THE NEW BUILDINGS ADDITIONS

### 5.1 Development summary

The proposed site additions as detailed in the plans submitted and Planning Report consists of:

- The construction of six (6) new Rooming Accommodation buildings each with 4 separate ensuite rooms (units). Total 24 units and total 30 units including the existing 6 accommodation units ;
- Six (6) standalone Private Activity Rooms buildings (ancillary use); and
- Two (2) ancillary standalone Toilet/Shower facilities buildings.

### 5.2 Traffic Generation Rate Rooming Accommodation

The 24-hour traffic survey counted 24 trips (12 entering and 12 leaving) the development, throughout the entire period. Daily trip generation rates for residences are well documented and referenced. The Transport for New South Wales TDT 2015/04a, recommends 7.4 trips per day for residences located in rural areas.

The trip rate adopted the higher value from TDT 2015/04a of 7.4 trips each (combined 15 trips) per day for both the residence and caretaker's residence was considered. Subtracting 15 trips per day for the existing residence and caretaker's requirements, leaves 9 trips per day for the existing 6 rooms, external dining guests and deliveries.

The net daily trip rate per rooming accommodation unit from the survey then becomes 1.5 trips per day equivalent to 36 new trips for the 6 X 4 units bedroom extensions. Given the private public transport initiatives adopted for the current development with respect to guests travel arrangements and long duration stays, the above proposed trip rate for the extensions represents the actual trips generated.

The corresponding total trips generated and existing site facilities, background traffic, house and caretaker's residences and building additions for the alternate likely case scenario as detailed in the above is summarised as follows:

- House and caretakers residences - 15 trips per day.
- Existing 1 X 6-bedroom unit - 9 trips per day

New building extension including external dining patrons and miscellaneous trips - 36 new trips

**TOTAL 60 trips per day development traffic** including the new and existing rooming accommodation, existing restaurant and buildings

Existing background traffic from surrounding properties along Gordon Smiths Road - 12 trips per day as per the traffic survey

**Total Gordon Smiths Road 72 trips per day** with development traffic and background traffic combined.

The above trips generated represents the scenario adopting the trip rates from the NSW Department of Transport publication for rural properties and relies on a communal bus / van to be supplied and operated by the owners.





## 6. SUMMARY AND CONCLUSIONS

There is no increase in the surveyed background traffic growth in Gordon Smiths Road due to the rural land use within the catchment and grid pattern of the road network providing separate choices for travel destinations.

Irrespective of the weather conditions, the pavement depth and ongoing maintenance along Gordon Smiths Road is primarily a function of volume and type of heavy vehicles. The development provides guest accommodation with no excessive use requirement for heavy vehicles. The traffic generated from the development is satisfactorily accommodated within the existing pavement width and formation without providing additional heavy vehicles affecting the existing maintenance regime.

On the basis of the owner supplying and operating a van / mini bus for transport of the rooming accommodation guests, the estimated 60 vehicles per day development traffic as detailed above is significantly less than the 100 vehicles per day threshold to warrant the upgrade to Gordon Smiths Road. Item 35A of the Decision Notice is not warranted and should be deleted.

The owner supplying and operating a van or mini bus is recommended for the collection of guests to / from public transport terminals and the airport to reduce car dependency and vehicle trips to be generated and the Approval can be conditioned accordingly.

Yours sincerely,

**DALE KLEIMEYER RPEQ 06876**

Principal Engineer – Traffic

cc Andrew J. Hill [andrew@alphaplanning.com.au](mailto:andrew@alphaplanning.com.au); Anita Schriek [anita@schriek.com.au](mailto:anita@schriek.com.au); Peter Schriek [peter@schriek.com.au](mailto:peter@schriek.com.au)

