

Date: 11 November 2025
Our Reference: J00993 - Avondale
Your Reference: MCUI/2020/1100/A & ERA/2020/1103/A

Attn: Alice Ssu-Chieh Pai

Toowoomba Regional Council
PO Box 3021
TOOWOOMBA QLD 4350

RECEIVED
11/11/2025
**TOOWOOMBA
REGIONAL COUNCIL**

Dear Alice,

Site Address:	240 Turallin Road, TURALLIN QLD 4357
Property Description:	Lot 2 on RP79686
Method of Distribution:	Email [development@tr.qld.gov.au / Alice.Pai@tr.qld.gov.au]
Correspondence Subject:	Response to Further Advice Letter Pursuant to s.35 (Chapter 1) of the Development Assessment Rules

We write on behalf of *Ellerslie Free Range Farms Pty Ltd* ("the Applicant") regarding the abovementioned development application.

On 29 October 2025, a further advice letter was issued by Toowoomba Regional Council, ("Council") as assessment manager. Pursuant to s.35 of the *Development Assessment Rules*, please refer below for the applicant's response to this request for further information.

This response is to be considered in conjunction with the following detailed attachments:

- Attachment 1 – Further Advice Letter
- Attachment 2 – Amended and Additional Proposal Plans
- Attachment 3 – Comparison Figure – Changes in Layout

Under s.35 of the *Development Assessment Rules*, we request that the assessment manager proceed with assessment of this application.

FURTHER ADVICE RESPONSE

1. Flood Hazard Overlay

1.1

Aspect of Development:

It is unclear whether the proposed location of the sheds is located within the Flood Hazard Overlay mapped over the site.

Further Advice:

Provide amended plans which clearly show the extent of the Flood Hazard Overlay over the site and the precise location of all proposed buildings and structures.

Should any part of the development fall within the overlay provide demonstration that the development is not adversely affected by the flood hazard and does not result in any increases in severity or adverse impacts of flooding within or external to a development site.

Applicant's Response:

The amended site plan included as part of the Amended Proposal Plans at **Attachment 2** has been updated to clearly illustrate the extent of the Flood Hazard Overlay over the site via hatching.

In order for all aspects of the development to fall outside the areas identified as being affected by the Flood Hazard Overlay, the Stage 1 manure pads and ponds area has been relocated to the north-west on the other side of the existing watercourse.

As such, the sheds and all other parts of the development do not fall within areas adversely affected by the Flood Hazard Overlay.

2. Environmental

2.1

Aspect of Development:

The Site-Based Environmental Management Plan (SBEMP) previously approved has not been updated to reflect the changes proposed as part of this change application.

Further Advice:

Provide an amended SBEMP that reflects the proposed changes to the development.

Applicant's Response:

Providing the level of detail involved in an amended Site-Based Environmental Management Plan (SBEMP) is unwarranted / unnecessary at this stage of the application. Instead, it is considered more appropriate that the SBEMP be resolved prior to the commencement of the use rather than prior to the commencement of on-site works.

As such, it is requested that a condition of approval requiring an amended SBEMP to be submitted and endorsed by Council prior to the commencement of the use be applied.

It is noted that this approach is consistent with that undertaken for minor change applications made on other poultry farms, for example MCUC/2016/1395/C.

2.2

Aspect of Development:

The Noise Impact Assessment previously approved has not been updated to reflect the proposed changes. It is unclear whether the proposed changes will result in any adverse noise impacts.

Further Advice:

Provide an amended Noise Impact Assessment that addresses potential impacts from the ancillary maintenance shed, machinery building, and feed complex that reflects the proposed change.

Applicant's Response:

Upon further review, the provision of an amended Noise Impact Assessment is not warranted in this instance. The following circumstances are noted in this regard, and these points should be read with reference to the comparison figure provided at **Attachment 3**.

- **Location/number of Sensitive Receptors:** No new sensitive receptors have been located in proximity to the site since the initial assessment was undertaken
- **Packhouse/Warehouse Area:** No material change to the packhouse/warehouse portion of the development, having regard to potential for noise impacts, is proposed.
- **Rearing Sheds:** Where these sheds have been removed, the proximity activities to sensitive receptors to the north-west of the site have been increased.
- **Manure Pad:** Whilst the amended location has increased the proximity of this activity to sensitive receptors to the north-west, and somewhat to the south-west, the activity remains separated from the nearest sensitive receptor by 1.3km. This part of the site is unlikely to generate inappropriate noise impacts having regard to this level of separation.
- **Relocated and Additional Laying Sheds:**
 - o The proposed change has substantially increased separation to the nearest receptors to the south west. It is likely that the potential for noise impacts to these receptors will be reduced.
 - o The relocation of activities means that the proximity and concentration of activities to the dwelling at Lot 1 DY1075 has increased. However, a separation distance of 1.5km is retained to this sensitive receptor.
 - o The separation distance to sensitive receptors to the north-west has not significantly reduced.
- **Ancillary Buildings** – the additional ancillary buildings (the maintenance shed, machinery building and feed complex) are unlikely to create any adverse impacts, noting the buildings are small in scale and function, and are located greater than 1km from any sensitive receptor.
- **Existing Modelling:** The current model shows that compliance with criteria for sensitive receptors was substantially met under the initial layout. That is:

- During the daytime period, the receptor with the highest noise modelled was the house at 68DY1028, at 27.3 LAeq(15 minutes) for daytime activity. The criteria was 35 LAeq(15 minutes). As noted above, the change in layout will locate the manure pad in greater proximity to this dwelling whilst removing the reading sheds previously proposed in proximity to this dwelling
- During the nighttime period, the receptors with modelled noise levels being closest to the criteria of 25 LAeq (15 minutes) were the cluster of dwellings to the south-west of the site. The proposed change will relocate noise sources away from these dwellings.

Having regard to the above, it is not likely that noise impacts would be increased as a result of the proposed change, and therefore an amended noise impact assessment is not warranted.

3. Plan Set

3.1

Aspect of Development:

The site plan identifies that previous grading/packing facility is now to be used as a Parkhouse/warehouse. The change proposes to remove the floor plans and elevations of this building, however no new floor plans or elevations have been provided.

Further Advice:

Provide floor plans and elevations of the proposed Packhouse/Warehouse.

Applicant's Response:

Floor plans and elevations of the proposed Packhouse/Warehouse were included in Attachment 3 of the submitted Minor Change Application. Moreover, a specific clarification was made in *Table 1 – Approved Drawings and Documents* of the submitted Minor Change Application which outlines which plans are the replacement plans for those removed.

Minor amendments to the design of the facility have been proposed, and therefore an updated revision of these plans has been provided at **Attachment 2** (refer to plans numbered 10 and 20).

3.2

Aspect of Development:

The site plan identifies a new Maintenance Shed is to be provided at Stage 1 and a Store building to be provided at Stage 2, however no plans (floor plans or elevations) have been provided of these buildings.

Further Advice:

Provide floor plans and elevations of the proposed Maintenance Shed and Store Building.

Applicant's Response:

The Amended Proposal Plans provided at **Attachment 2** have been updated to include floor plans and elevations for the Stage 1 Maintenance shed (plan no. 12) and the Stage 2 Store Building (plan no. 13 and 21) as requested.

3.3

Aspect of Development:

The site plan does not clearly identify the location of the Stage 1 Maintenance Shed, Machinery Building or Feed Complex. It is unclear whether these structures are the buildings which are located above the pinpointed locations, or if these buildings are additional proposed buildings which have not been labelled.

Further Advice:

Provide an amended site plan which confirms whether the above-mentioned buildings are the Stage 1 Maintenance Shed, Machinery Building or Feed Complex.

Where the above-mentioned buildings are not the Maintenance Shed, Machinery Building or Feed Complex, provide the floor plans and elevations for these additional buildings and amend the Site Plan to confirm the location of the Maintenance Shed, Machinery Building or Feed Complex.

Applicant's Response:

The amended site plan included as part of the Amended Proposal Plans at **Attachment 2** has been updated to more accurately label and identify the Stage 1 Maintenance Shed, Machinery Building, and Feed Complex. This has been achieved by realigning the arrows used in labelling, and providing setbacks to ensure the approved location is more easily distinguishable.

To this end, the amended site plan confirms the inclusion and location of the Stage 1 Maintenance Shed, Machinery Building, and Feed Complex, meaning that flood plans and elevations for 'additional buildings' are not relevant or required in this instance.

3.4

Aspect of Development:

The proposed changes seek to remove the site plans of the Manure Pad and Pond and Layer Shed area and the Wastewater Treatment Plant and Grading and Grading and Packing Floor area. No new plans have been provided to show the newly proposed details of these areas.

Further Advice:

Provide Site Plans of the newly proposed Manure Pad and Pond and Layer Shed area and the Wastewater Treatment Plant and Packhouse/Warehouse area which clearly identify/label all proposed buildings and structures and associated manoeuvring, car parking and laydown areas.

Applicant's Response:

The Amended Proposal Plans provided at **Attachment 2** have been updated to include dedicated site plans for the proposed Manure Pad and Pond area (Plan no. 15), the Laying Shed area (Plan no. 11), the Wastewater Treatment Plant, and the Packhouse/Warehouse area (Plan No. 14).

These dedicated site plans have been illustrated to convey a greater level of detail than the overall site plan; depicting specific buildings and structures and associated manoeuvring areas including car parking and laydown areas.

SUMMARY

In accordance with s.35 of the *Development Assessment Rules*, this correspondence represents a response to Further Advice letter and we hereby request that the assessment of this development application now continues.

Whilst we trust this information is sufficient to enable you to progress with the assessment of this development application, should you have any queries, please do not hesitate to contact the undersigned on (07) 4632 0516.

Yours faithfully,
Property Projects Australia Pty Ltd



Blake Brindley
Senior Town Planner

Enc. As above.