

23 November 2017

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Attention: Nadia McLeod – Development Assessment

RECEIVED
24/11/2017
TOOWOOMBA
REGIONAL COUNCIL



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24A-28 James Street, Rangeville
Response to submissions
MCU/2017/4863

Dear Nadia,

Following the completion of the statutory notification period for the abovementioned development, seeking a material change of use for childcare, we provide the following response to the two submissions that were lodged with Council.

In summary, it is considered that the issues raised by the submitters (one being a childcare competitor) have been addressed in the town planning report, supporting technical assessments lodged with the application, and the material provided in the information response to Council. No additional information is required to demonstrate the proposed development's compliance with the provisions of the Toowoomba Planning Scheme, or to justify where the application provides a performance outcome.

A planning scheme cannot contemplate every situation. By allowing alternative design solutions that meet performance outcomes (supported by technical assessment), where responding to site specific situations, is how a Planning Scheme can enable development to be achieved for appropriate uses.

Attached is a response to the matters raised by the submitters, identifying how the application has already addressed these, with reference to reports previously provided to Council as part of the assessment.

We thank Council for the opportunity to provide a response to the issues raised by the submitters and seek Council to make an informed determination on the proposal, using sound planning assessment.

Should you wish to discuss the responses provided, please do not hesitate to contact me directly to discuss.

Your partner in planning,

A handwritten signature in black ink, appearing to be 'Hazel Coalter', with a long, sweeping underline.

Hazel Coalter
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Response to Submissions

The following is a summary of the issues raised in the two submissions prepared by JFP consultants on behalf of Future Leaders Early Learning Pty Ltd and RD Smythe Architects. The submitter issues have been summarised from their submissions, with the Applicant's response to each matter provided in the corresponding column. It is considered that the Applicant has addressed all matters raised in the submission previously through the town planning report and supporting technical studies lodged for assessment and further through the response to the Information Request issued by TRC.

Submitter issue	Response to issue
<p>The grounds of objection against the proposed development area as follows:</p> <p>(1) The subject site is not suitable for a childcare centre as it is in a residential area and is located on a local, residential street. Access is also provided via a lower order road which is currently used for residential purposes only. This is in direct conflict with Council's policy position regarding the location of childcare centres.</p> <p>Points raised in support of this objection are summarised below from the submission prepared by JFP on behalf of Future Leaders Early Learning Pty Ltd:</p> <ul style="list-style-type: none"> ∞ Child care centres are not located on local/roads streets. ∞ Vehicle access should not be provided via local roads/streets. ∞ The proposal conflicts with Low-medium density residential code overall outcome (j) and Performance Outcome (PO9); community and recreation uses code Performance Outcome (PO8); ∞ The application cannot meet the locational criteria for a child care centre as access is restricted to James Street and Cohoe Street local access designation limits access to this type of development. 	<p>It is recognised throughout the application and supporting technical documents (lodged for assessment) that the road hierarchy of Cohoe Street was the trigger that elevated the assessment of the proposed use to impact assessment, from code.</p> <p>When an application is Impact Assessable it can demonstrate an alternative to the acceptable outcome, where it is demonstrated that the performance outcome is achieved. A planning scheme cannot contemplate every situation.</p> <p>During prelodgement discussions with Council and SARA/DTMR it was confirmed that access to James Street is restricted, and that the unique situation (that Cohoe Street was previously constructed to meet higher road hierarchy requirements and has been subsequently downgraded to a local access, following changes to the northern intersection, to ensure the highway retained priority movements) has enabled the traffic impact assessment to demonstrate that the proposed use will have limited impact on the existing amenity of Cohoe Street, within the vicinity of the site, nor will the operation of the child care facility have an impact on the current operation of the road network.</p> <p>Additionally, all car parking requirements for a child care facility, as identified by the TRC Planning Scheme, are being met on site.</p> <p>Supporting material on these matters is taken from the town planning report (Section 4.2) and provided again below:</p> <p>The purpose of the LMR zone is stated to (emphasis added): <i>"The code will ensure that the amenity and lifestyle of residents in the Low-medium Density Residential Zone is conserved while providing mechanisms to promote and implement a mix of housing forms at a density appropriate to each locality and precinct and <u>including a limited mix of non-residential uses that are only intended to service the day to day needs of residents located within the zone.</u>"</i></p> <p>The proposed development supports the purpose of the LMR zone, providing a non-residential use that services the day to day needs of residents within the immediate area. Given the position of the</p>

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<p>∞ Rational for locating child care centres on higher order roads is to avoid the potential for developments to introduce non-local traffic on lower order, residential streets. There are no other non-residential uses in this street, therefore the reasonable expectation for residents in this street is for local traffic only and should not include traffic associated with commercial uses.</p> <p>∞ The increase in traffic identified in the traffic report is substantial and is not considered suitable for a local residential street. Such an increase is considered incompatible with the existing low-density character of this area.</p> <p>∞ The proposal will diminish existing residential amenity of this area.</p> <p>∞ The left-in, left-out access arrangement utilising the cul-de-sac head for turning is difficult and unsuitable for a residential street.</p> <p>∞ The traffic report includes discrepancies regarding the calculation of the proposed additional traffic that will be generated by the development (section 4.1 and 4.4 of the traffic report).</p> <p>This response also addresses the objection made by R D Smythe:</p> <p>∞ Access to the site through residential streets adversely affecting the amenity of the area.</p>	<p>site adjoining a major road, introducing a non-residential use on this land, will provide a buffer to the noise and amenity impacts of the road on the existing neighbourhood</p> <p>The overall outcomes sought by the code include (emphasis added):</p> <p><i><u>“non-residential uses occur only where such uses directly support the day to day needs of the immediate residential community located in the zone and do not undermine the viability of other centres or centres network, are located with direct access to a road at the distributor, sub-arterial and regional arterial level in the road hierarchy, are in buildings of a scale that is consistent with the surrounding residential area or are a reuse of existing non-residential buildings, and all car parking needs can be met on site. Such uses include:</u></i></p> <p style="padding-left: 40px;"><i>(i) child care centre...”</i></p> <p>The proposed non-residential use includes a building of single-storey residential scale, and accommodates all parking needs on site...</p> <p>The planning scheme identifies child care centres as an appropriate non-residential use to support the day to day needs of a residential community. Given the entry in this location would be best supported from Cohoe Street, even though it is a local road within the Council’s hierarchy. It is noted that the proposed downgrade of James Street is identified in the planning scheme mapping to a regional arterial, which is an appropriate level of road hierarchy to support a use of this type.</p> <p>Regardless of whether James Street is downgraded, the entry location from this frontage would need to be limited to left-in and left-out only, to ensure safety of vehicles on the road. A pre-referral response was provided by Department of Main Roads (DTMR) which confirms their support of the access from Cohoe Street.</p> <p>More specifically the prelodgement minutes referenced Performance Outcome 9 (PO9) in the assessable tables relating to Non-Residential Uses – Impact on the Road Network.</p> <p><i>PO9 – Non-residential uses are located on major roads and do not introduce non-residential traffic into the local streets.</i></p> <p><i>AO9.1 – Non-residential uses are located on a Regional Arterial, Sub-Arterial or Distributor Road and access to the development is not from a local street.</i></p> <p>The planning scheme states that acceptable outcome (AO9.1) is the solution that is most supported to achieve the performance outcome. However, when an application is Impact Assessable it can demonstrate an alternative to the acceptable outcome, where it is demonstrated that the performance outcome is achieved.</p>

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	<p>The town planning report illustrated the current road hierarchy of James Street and Cohoe Street. Cohoe Street, where proposed access is sought, is a local street. The second frontage of the site is to James Street which is proposed to be downgraded to a Regional Arterial road. James Street (adjoining the site) is currently controlled by DTMR, who have provided a pre-referral response in support of access from Cohoe Street.</p> <p>It is evident that the intersection arrangements at the junction of Cohoe Street and James Street/Warrego Highway have been changed to reduce traffic conflicts and increase safety. It is likely that these changes were implemented as part of the development of the shopping complex to the north-east of the subject site.</p> <p>Access into Cohoe Street is now only offered as a left-in from James Street (east). Although the street is categorised as a local street in the road hierarchy order, it is evident on inspection that the cross-sectional design of the road was to carry a much greater level of traffic. There is no direct access to James Street (Warrego Highway) from Cohoe Street.</p> <p>The Traffic Impact Statement prepared by McLaren Traffic Engineers states the following regarding Cohoe Street:</p> <p><i>Cohoe Street south of James Street is:</i></p> <ul style="list-style-type: none"> ∞ An unclassified local road; ∞ <i>Is approximately 16m in width (including a 3m wide median strip) facilitating a divided carriageway with one traffic lane in each direction and kerbside parking;</i> ∞ There is no speed limit posted, 50km/hr applies; and ∞ There is unrestricted kerbside parking on both sides of the road. <p>It is noted that the kerb-to-kerb cross-sectional distance across Cohoe Street (approximately 16m) is like that of the Warrego Highway (approximately 16m).</p> <p>The use of Cohoe Street in proximity to the site is limited, with only four residential driveways gaining access between Adina Street and James Street. It is likely that some traffic from the shopping complex to the north-east of the site would use Cohoe Street, when leaving the centre, otherwise use is limited. All car parking requirements for the site are managed on-site, and therefore it is anticipated that the amenity of the residents on Cohoe Street would not be significantly affected by the introduction of traffic related to the proposed childcare facility.</p>
<p>(2) The external traffic network close to the site does not provide a safe or functional environment for a child care centre;</p>	<p>It is recognised that the subject site is located on a prominent corner in the Warrego Highway, where the road turns 90 degrees to head west into Toowoomba. Childcare centres are allowable</p>

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<p>Points raised in support of this objection are summarised below from the submission prepared by JFP on behalf of Future Leaders Early Learning Pty Ltd:</p> <ul style="list-style-type: none"> ∞ External traffic network close to the site does not provide a safe or functional environment for a new child care centre. There is concern regarding the potential injury to children and staff in the centre or damage to the proposed building, should an accident occur. ∞ The existing line marking and traffic control at the intersection of James Street and Cohoe Street is insufficient to ensure safe traffic movements. Current line-marking can still allow patrons to make an illegal right-hand turn at this intersection to enter the slip lane at the head of Cohoe Street. <p>This response also addresses the objection raised by R D Smythe:</p> <ul style="list-style-type: none"> ∞ The proximity of the site to a major highway used by heavy vehicles. 	<p>adjoining this road type. DTMR are making fundamental changes to reduce the load on this road network through the construction of the second range crossing and Toowoomba bypass.</p> <p>More immediate safety measures have been undertaken including changes to the intersection and road hierarchy at the apex of the bend where the Warrego Highway/James Street/Cohoe Street intersect. Access into and out of the northern end of Cohoe Street have been limited / prevented, and there is a left-in, left-out access into James Street at this location. The dominant movement is the through traffic of the Warrego Highway.</p> <p>Crash barrier infrastructure has also been installed along the southern extent of the road to reduce the ability for uncontrolled vehicles impacting on the adjoining land uses (the subject site). Extensive dense planting has also been provided through the intersection to remove confusion for drivers.</p> <p>Impacts on the crash barriers are evident, however it is our understanding that no roll-over accidents have occurred into the subject since the introduction of the barriers and a reduced speed limit through this section of the highway. These mitigation measure are proven to be 'doing their job'.</p> <p>The proposed development necessitates a solid acoustic barrier of 2.2m along the length of the northern boundary where being used for the daily childcare operations (excluding the car parking area). This acoustic barrier, will achieve acoustic and air quality requirements in accordance with SDAP and Council standards. However, it will additionally provide a second level of safety and separation of the childcare use from the Warrego Highway.</p> <p>The traffic impact assessment has determined that traffic flow in and out of the child care facility will be from the south of the site, and therefore little to no traffic will enter from the James Street/Cohoe Street intersection. Should a limited number of patrons use this manoeuvre to access the site, the cul-de-sac arrangement of the northern end of Cohoe Street, and the existing median, will ensure that the left-in, left-out access will be compatible with existing traffic movements within the street and not impact on existing amenity, or impede the natural flow of traffic.</p>
<p>(3) The proposed development does not comply with the Planning Scheme requirements for landscaping around the frontages and boundaries of the site;</p> <p>Points raised in support of this objection are summarised below from the submission prepared by</p>	<p>The proposed development has provided a performance outcome to address PO6 of the landscape code. The alternative outcome allows for appropriate landscaping to be provided along the eastern frontage of the site, to achieve an attractive streetscape, whilst also enabling natural surveillance into and out of the site.</p> <p>The design outcome for the car parking additionally enables the reduction in retaining wall heights and management of stormwater across the site, allowing the overall development to achieve a desirable outcome when considered in its entirety. Achieving every acceptable outcome within the Planning Scheme in many cases (including this one) is unachievable, due to site specific conflicts</p>

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<p>JFP on behalf of Future Leaders Early Learning Pty Ltd:</p> <ul style="list-style-type: none"> ∞ Proposal does not comply with the minimum landscaping requirements and does not provide a suitable interface with the existing residential character of the surrounding locality. ∞ Landscaping code AO6.2 has not been sufficiently addressed. ∞ Proposed landscaping is not considered sufficient to accommodate and support a high-quality landscape buffer which will screen the carpark from the street. ∞ The car park introduces a large, hardstand environment at the front of the site which is not sympathetic or compatible with the existing residential character of the streetscape. ∞ The landscaping does not satisfy PO6 or PO9 of the low-medium density residential zone code. ∞ The proposed acoustic fences do not comply with AO5.3 of the landscaping code. <p>This response also addresses the matters raised by R D Smythe in their submission:</p> <ul style="list-style-type: none"> ∞ Landscaping – Cohoe Street landscaping infringes on the car parking spaces, and is insufficient for mature trees 	<p>that need to be addressed. It is considered that the landscaping outcome proposed achieves a streetscape outcome that will support the existing residential nature of the street, whilst addressing the inclusion of a non-residential activity that includes car parking on site.</p> <p>In relation to not achieving AO5.3 of the landscape code, a performance outcome has been provided. The acoustic requirements of the site, due to the proximity of the Warrego Highway, has resulted in fence heights greater than those required as acceptable outcomes. The existing established residential environment additionally does not allow for 3m landscaping buffers on either side of acoustic fences.</p> <p>The outcome proposed includes vegetation being planted along the internal sides of the acoustic fences to provide a natural extension of the fences, whilst also including clear panels above 1.8m in height to allow the transfer of light into the properties. The achieved outcome is considered appropriate for the site and the proposed uses, whilst respecting the needs and amenity of the neighbouring properties (which are built to boundary on the southern side).</p> <p>The landscape concept for the site was designed in collaboration with the hydraulic engineers to ensure that the resulting outcome enabled the collection and reuse of water harvested on site. The stormwater outcome, and landscape outcome provide a holistic and acceptable approach to stormwater management and reuse.</p>
<p>(4) The proposed development does not comply with the Planning Scheme requirement for fence/retaining wall heights; and</p> <p>Points raised in support of this objection are summarised below from the submission prepared by JFP on behalf of Future Leaders Early Learning Pty Ltd:</p>	<p>The environmental standards code set the assessment benchmarks for air and noise quality requirements for the proposed use. These were all considered as part of the assessment, with supporting air quality and noise impact assessments provided.</p> <p>The site meets the requirements for air quality.</p> <p>Whilst the noise impacts were greater, these have been adequately addressed through the provision of the acoustic fencing proposed. The planning scheme requires acoustic fencing of non-residential uses within a residential environment on all adjoining boundaries. This has been</p>

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<ul style="list-style-type: none"> ∞ The combined heights of the retaining walls and acoustic fences do not provide a suitable interface to the adjoining residential properties. ∞ Plans should be amended to comply with standards in PSP no. 2 (requiring terracing of retaining and acoustic fencing). <p>This response also addresses the matters raised in the R D Smythe submission:</p> <ul style="list-style-type: none"> ∞ Privacy – the screen fencing on the southern boundary includes clear sheeting, which will allow neighbours to look into the outdoor play area and vice versa. This is unacceptable. 	<p>provided, although the overall heights of the fencing are greater than the planning scheme provision of 1.8m.</p> <p>To ensure the acoustic fences, achieve the desirable levels of noise set out in the scheme it is necessary to exceed the minimum requirement. However, the potential impact of the increased height in the fences has been ameliorated by including clear panels in the upper sections of the fence.</p> <p>The clear panels will be at a height no less than 1.8m from the ground level within the subject site, ensuring the overlooking, from either side of the fence, will not result in a privacy issue. Additionally, within the site tall plantings along the extent of the fencing will contribute to reducing any potential for overlooking.</p>
<p>(5) The proposed stormwater management arrangements are not considered suitable and may potentially cause nuisance and adverse impacts on the operation of James Street (state-controlled road).</p> <p>Points raised in support of this objection are summarised below from the submission prepared by JFP on behalf of Future Leaders Early Learning Pty Ltd:</p> <ul style="list-style-type: none"> ∞ Concern regarding the extent of discharge to James Street kerbside. ∞ There are no proposed upgrades to the existing stormwater infrastructure in James Street and report does not clearly establish of the existing infrastructure has capacity to accommodate the proposed development. 	<p>The CSMP supporting the application provided a comprehensive assessment of the concept stormwater management plan proposed for the site. In summary (as provided in the report):</p> <p><i>It is proposed to capture all roof runoff generated from the new childcare facility and direct it to rainwater tanks located on either side of the building – one 8KL slimline tank proposed on the south side (Tank A, located in Outdoor Play Area 1) and three 8KL slimline tanks on the north side (Tank B, located in Outdoor Play Area 2). The tanks will allow for some stormwater harvesting for irrigation backup (approximately 600mm depth of water), with the volume above being reserved for attenuation of runoff to achieve a gross site runoff for storms up to the 100year ARI comparable with the existing condition.</i></p> <p>It is considered that the on-site attenuation measures proposed will ensure that the discharge to James Street and Cohoe Street existing stormwater infrastructure will be managed to be comparable with the existing condition.</p> <p>The submission has provided no technical justification for their statement regarding potential impacts. The CSMP prepared supporting this application was undertaken and signed by a qualified RPEQ, as required by TRC and the Planning Scheme.</p>
<p>RD Smythe raised the following matter in their submission:</p> <ul style="list-style-type: none"> ∞ Evacuation gate – proposed development identified emergency access through a gate on 	<p>It is acknowledged that there is a pedestrian access to the site from the northern boundary. This is the at-grade access point into the site. This location has not been defined as the evacuation point from the site once the premise is operational. An evacuation plan will be established by the operator prior to the childcare facility opening. It is likely that the evacuation point will be to Cohoe Street.</p>

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<p>the northern boundary. Is it acceptable that 112 children be evacuated onto the Warrego Highway? Emergency access to Cohoe Street is a safer option.</p>	<p>Feedback from the prelodgement meeting with Council included a preference to have James Street activated by way of a pedestrian access. This has been included in response to this feedback, as well as providing a good design outcome for the site and adjoining streetscapes.</p>
<p>RD Smythe raised the following matter in their submission:</p> <p>Security lighting – location of lighting is not identified in the proposal, this needs to be in accordance with the relevant Australian Standard to avoid light spill into neighbouring properties.</p>	<p>The site will include security lighting that will be detailed on detailed building plans. The applicant has acknowledged in the code responses provided that all security lighting will be installed in accordance with the relevant Australian Standards.</p> <p>Council can provide a condition of development for all external lighting to be installed and located in accordance with the relevant standards.</p>
<p>RD Smythe raised the following matter in their submission:</p> <p>Community and recreation code uses</p> <ul style="list-style-type: none"> ∞ There is no separate pedestrian access from the street as required under PO2. ∞ The site is not located to minimise the hazards of heavy traffic (PO8a). ∞ The development will introduce non-local traffic into minor residential streets including a cul-de-sac. 	<p>The proposed development (in response to feedback from the prelodgement meeting) provides a pedestrian access to the northern boundary (James Street/Warrego Highway), this access is in proximity to the north-eastern corner of the site, so easily accessible from Cohoe Street. Most children will be dropped off by vehicle, and as such a secondary access to Cohoe Street was not included, with those wishing to access from here, either able to utilise the double width driveway access, or walk around to the James Street pedestrian access.</p> <p>The site has been designed to turn its back to the heavy traffic road, with a 2.2m minimum acoustic fence providing a solid separation between the road and the site. The proposed development addresses Cohoe Street, with the setback of the car parking enabling the site to be transparent to those on James Street. The potential hazards of heavy vehicles have been sufficiently addressed through fencing measures to ensure air quality and noise levels are acceptable for the proposed use. A secondary benefit of the acoustic fence is added built from between the proposed use and the road.</p> <p>The matter of introducing non-local traffic into a minor residential street has been addressed above, as the same matter was raised by JFP Consultants on behalf of their client. It has been demonstrated that this will have no significant impact on the existing residential neighbourhood or the existing flow of traffic.</p>
<p>RD Smythe raised the following matter in their submission:</p> <p>Access</p>	<p>The traffic impact assessment lodged with the application, and updated as part of the response to the information request has clearly demonstrated that the existing network has sufficient capacity to support the introduction of the traffic generated by the childcare centre, without any upgrades to intersections or signage changes.</p>

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<ul style="list-style-type: none"> ∞ Adina Street has no centreline and has a barrier type kerb. It is considered too narrow for additional traffic. ∞ It is recommended that if the proposal proceeds that a roundabout is installed at Crown Street, and a no U-turn sign be erected in the median strip at the intersection of Roessler and Adina Street to limit traffic approaching the site from James Street (eats); and a no left turn sign be installed at the eastern end of Adina Street preventing traffic turning left into Cohoe Street. 	
<p>RD Smythe raised the following matter in their submission:</p> <p>Parking</p> <ul style="list-style-type: none"> ∞ Swept path diagrams show that the car park is difficult to negotiate. ∞ The location of the site in a cul-de-sac will create congestion (due to number of staff and limited number of carp parks on site) during peak periods which will affect the existing resident's ability to use their streets. 	<p>The swept path diagrams demonstrate that all car parks within the site can be negotiated adequately. The large cul-de-sac head adjacent to the site, at the northern end of Cohoe Street, can adequately accommodate turning movements to allow a left-in, left-out access arrangement for the child care centre.</p> <p>The car park on site provides car parking at the specified rate for a child care centre.</p>
<p>RD Smythe raised the following matter in their submission:</p> <p>Noise Impact</p> <ul style="list-style-type: none"> ∞ Further monitoring should be taken on the eastern side of the site to ascertain the correct noise levels to be used in the design of the acoustic barriers. ∞ The shadow cast by the noise barriers along James Street frontage will mean that the outdoor play area will be unsuitable for children during winter period. 	<p>Monitoring on the site as part of the Noise Impact Assessment was undertaken to determine the level of noise currently affecting the areas of the site where outdoor play areas are located, as well as to identify the background noise levels experienced by residents. It is not considered necessary to undertake further monitoring at the eastern end of the site as the proposed development only includes car parking in this area, where noise attenuation levels do not need to be lower.</p> <p>The fencing along the northern boundary of the site have been established by the necessary amelioration requirements set out in the triggered DTMR SDAP provisions. Shadows within the outdoor play area will be appropriately managed through the detailed design, with shade tolerant planting used to ensure landscaping within the site is successful.</p> <p>Shaded areas for play are considered beneficial for children, with other areas of the site unshaded to allow for full sun play when appropriate.</p>

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<p>RD Smythe raised the following matter in their submission:</p> <p>Air Quality</p> <p>∞ Air quality assessment identifies the need for a solid gap free fence on the northern boundary to meet emissions control performance requirements (PO30). Life-stock trucks are higher than this, how will PO30 be met given these circumstances?</p>	<p>The proposed development has demonstrated that the air quality criteria set by both Council and SARA/DTMR are met through the inclusion of the solid acoustic fence along the length of the outdoor play areas of the site. It is not possible to ameliorate for all circumstances, without affecting the streetscape and built form outcomes.</p> <p>The Air Quality report lodged with the application included site specific assessment and monitoring to determine the existing air quality and emissions present at the site. The following are statements taken from the report:</p> <p><i>Warrego Highway (Ipswich-Toowoomba) is a segment of the Queensland state-declared road network, specifically road 18A. Traffic data was obtained from TMR's traffic census data for Warrego Highway 18A, approximately 100 metres east of James Street.</i></p> <p><i>Modelling of road traffic emissions has been undertaken using traffic data from TMR. An emission inventory for emissions from vehicle traffic has been developed using the emission calculation software Copert Australia. To ensure the emission factors determined by the Copert software were accurate, ASK has obtained vehicle population and activity data for Queensland from DSITI.</i></p> <p><i>TMR (2014) requires a detailed air quality assessment if sensitive uses are located within 20 metres of the kerb of a road with traffic volume between 20,000 and 50,000 at completion date of the development. The detailed assessment is required to demonstrate that predicted air quality meets the EPP (Air) ambient air quality criteria.</i></p> <p><i>Although air quality assessment was not triggered by the anticipated traffic volume at completion date (18,307 per day), it is triggered by the anticipated traffic volume in 10 years after the completion date (29,820 per day). It was considered likely that detailed modelling would be required, so this report proactively includes the results of detailed modelling.</i></p> <p><i>Under SDAP (2017), the development will comply with the acceptable outcome relating to air quality management for a child care centre (Acceptable Outcome 30.1) as a solid gap-free fence will be installed as a noise barrier shielding the outdoor play areas from James Street.</i></p> <p><i>The results tabulated and illustrated in the report showed that concentrations are predicted to comply with the EPP criteria.</i></p> <p>Beyond the solid acoustic fence (required for acoustic attenuation) no further mitigation measures were determined necessary to manage or mitigate air quality for the site.</p>