

NOVUS URBAN*Town Planning Consultants*PO Box 399, Highfields QLD 4352 | stephen@novusurban.com

28 September 2026

Our ref: K4824**Your ref:** RAL/2026/6365

The Assessment Manager
Toowoomba Regional Council
PO Box 3021
TOOWOOMBA QLD 4350

Attention: Alanna Walker, Planning Branch

By email: development@tr.qld.gov.au

Dear Alanna

RESPONSE TO INFORMATION REQUEST**Reconfiguring a Lot (Boundary Realignment, Four Lots into Four Lots)****Lots 1 and 2 on RP21632, Lot 264 on A34251 and Lot 337 on A34254, Donovan Road, Cabarlah**

We act for the applicant, Pureland Developments Pty Ltd, and refer to Council's information request dated 10 August 2026.

In accordance with section 13.2 of the Development Assessment Rules, the applicant provides all of the information requested. The response comprises this letter and the amended proposal plan prepared by K.J. Wilson, Cadastral Surveyor (File Ref K4824, Version B, dated 20 September 2026, Sheets 1 to 7) at Attachment 1. Version B supersedes the proposal plan lodged with the application.

Sheet 7 (Plan of Building Envelopes for Lots 13 and 14) is the consolidated site plan requested at Items 1.1 and 2.1. It shows the building envelopes (BLEs), the indicative effluent spray areas, the edge of the existing tree line and dimensioned setbacks.

Changes to the plan of reconfiguration

The configuration of Lots 13 and 14 has been adjusted so that the building envelopes and effluent areas are located on land with a slope of less than 15%. The number of lots, Lots 11 and 12, and the nature of the development are unchanged.

Purpose of the building envelopes

The BLEs demonstrate that a dwelling can be sited on each of Lots 13 and 14 without the need for a Bushfire Management Plan or Geotechnical Report. They are provided for that purpose only. A future owner may site a dwelling elsewhere on the lot where compliance with the applicable overlay codes is demonstrated at that time, as the planning scheme provides (Table 5.10:1). The BLEs should not be imposed as a condition confining future buildings to the envelopes, as this would require a future owner to make a change application to access an assessment pathway the planning scheme already provides.

Item 1.1: Bushfire Hazard Overlay Code (PO5, Table 8.2.2:2)**Council's request:**

Provide a consolidated site plan for Lots 13 and 14 showing the building envelopes, dimensioned setbacks to hazardous fuel loads, vegetation to be retained or removed, and any Asset Protection

Zones. A Bushfire Management Plan is required only if a building envelope is located within 10 m of hazardous fuel loads.

Our response:

Sheet 7 dimensions the separation between each BLE and the edge of the tree line, being the nearest hazardous fuel load. The Lot 13 BLE is set back 30.5 m and the Lot 14 BLE 33.0 m. Each exceeds the 10 m separation nominated in Council's request, and each lot can accommodate a safe building site. The separation is achieved entirely within existing cleared land. No vegetation clearing is proposed as part of this application.

The development achieves PO5. Council's request confirms a Bushfire Management Plan is required only where envelopes are located within 10 m of hazardous fuel loads. That is not the case, and a Bushfire Management Plan is not required. As bushfire separation is achieved without clearing, no conflict arises with the retention of vegetation.

Item 2.1: Environmental Significance Overlay Code (PO1, Table 8.5.1:1)

Council's request:

Provide a consolidated site plan for Lots 13 and 14 showing the setbacks from the building envelopes to significant vegetation, the dimensions of the effluent areas and their setbacks to significant vegetation, and vegetation to be retained or removed. An Ecological Impact Assessment Report is required only if the envelopes are located so that bushfire separation would require clearing of significant vegetation.

Our response:

The BLEs are located on land that has been cleared, as Council's request acknowledges, and are set back 30.5 m (Lot 13) and 33.0 m (Lot 14) from significant vegetation.

The Lot 13 effluent area measures 30 m x 20 m (600 m²) and the Lot 14 effluent area 40 m x 20 m (800 m²). Both are sited within cleared land with no significant vegetation in proximity. Consistent with AO1.1, any impact on areas of ecological significance is minimised. The BLE and effluent area together occupy approximately 6% of Lot 13 and 0.3% of Lot 14, both are sited on cleared land, and the vegetated land is consolidated within Lot 14 (77.04 ha) as a single holding.

As the BLEs are not located proximal to significant vegetation and bushfire separation requires no clearing, the circumstance that would require an Ecological Impact Assessment Report does not arise. The development complies with PO1.

Item 3.1: Gradient of Building Envelopes

Council's request:

The Lot 13 building envelope and the Lot 14 effluent area are on land exceeding 15% slope. Locate the building envelopes and effluent areas entirely on land below 15% slope or, alternatively, provide a Geotechnical Report prepared by an RPEQ.

Our response:

The applicant adopts the first option in Council's request. The BLEs and indicative effluent areas have been sited so that each is located entirely on land with a slope of less than 15%. The maximum slope within each is:

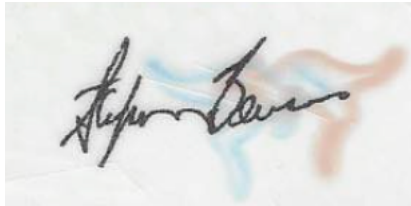
Lot 13 BLE	6%
Lot 13 effluent area	9%
Lot 14 BLE	10%
Lot 14 effluent area	8%

Each is also located outside the area mapped on the Landslide Hazard Overlay (Sheet 3). As the BLEs and effluent areas are clear of land exceeding 15%, the State Planning Policy trigger identified by Council does not arise and a Geotechnical Report is not required.

Conclusion

The applicant has provided all of the information requested and asks that Council proceed with its assessment of the application. Please contact the undersigned should you have any queries.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Stephen Bowers', is written over a background of faint, overlapping blue and orange lines.

Stephen Bowers

Project Director

Novus Urban

M 0421 709 711 | E stephen@novusurban.com

Attachment 1: Proposal Plan, K.J. Wilson Cadastral Surveyor, File Ref K4824, Version B (Sheets 1 to 7)