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30 January 2026

Toowoomba Regional Council
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Via email: development@tr.qld.gov.au

Attention: Jayden Forbes-Mitchell

Project Name: Fernleigh Development - 119 East Drews Road | Westbrook
Project No: 25E-0272
Council Reference: MCUI/2024/7257

Dear Jayden,

Please find below our response to the 2 items in Council's further advice letter dated 3 November 2025, Council reference MCUI/2024/7257.

1.0 Water Supply
Aspect of Development: The Response to Further Advice Letter Appendix B includes hydraulic model pressure and flow results for 100 lots as modelled by Council. The Council report states: ▪ Development of the site has been previously allowed for in the model in the 2041 planning horizon, once full development of the Priority Infrastructure Area (PIA) is assumed to be reached in Westbrook. The proposed development is located outside of the PIA and therefore inclusion of these lots onto the water supply network will reduce Council's ability to supply growth within the PIA. Consultation with Development Assessment will be required to determine if the provision for additional trunk infrastructure capacity is required. Council has undertaken an assessment of Residential EP demand from development sites within the PIA based on existing development approvals and applications and compared those to the assumptions within the Greater Western Toowoomba Water Supply Study Planning Report 2023 (Water Supply Study). Our investigation indicates that development sites within the PIA and serviced by the Glenvale Reservoir (generally being the area south of Hursley Road and west of Boundary Street) are being developed at a faster rate compared to the assumptions within the Water Supply Study as shown in the table below. On this basis there is the possibility that development of 100 lots on the Subject Site may have an adverse impact on water supply for development sites within the PIA.

EP - Actual Development Pattern with Design Year Assumptions

Development Details						EP at Final Year of Opening					
Name	App No	Stage	Lots	EP/ET	EP	2026	2031	2036	2041	2061	Total
Gainsborough	RAL/2020/5054/B	1	56	3.1	174	174					
	RAL/2022/4965	2 to 8	340	3.1	1054		1054				
	Hillside (not approved)		42	3.1	130			130			
Alford Grove	RAL/2015/1869/A	1A to 5B	314	3.1	973	973					
300 Drayton Wellcamp Road	MCUC/2024/8131	1	331	3.1	1026		1026				
	RAL/2024/8129	2	21	3.1	65		65				
	Balance (not approved)	3	108	3.1	335			335			
390 Drayton Wellcamp Road	RAL/2025/7308	12dwgs/ha	288	3.1	893			893			
Total					**4650**	**1147**	**2145**	**1358**			**4650**

EP - Greater Western Toowoomba Water Supply Study Planning Report 2023 Assumptions

Development Details	EP at Design Year					
	2026	2031	2036	2041	2061	Total
Gainsborough	796	797				1593
Alford Grove	180	345	260			785
300 Drayton Wellcamp Road					1107	1107
390 Drayton Wellcamp Road					1237	1237
Total	**976**	**1142**	**260**		**2344**	**4722**

The Water Supply Study identifies many infrastructure works in the 2036 planning horizon that need to be implemented before the development of Fernleigh in 2041. Further water modelling is required based on the actual development pattern as tabulated above to determine if the timing of water infrastructure upgrades needs to be changed.

Further Advice:

Update the Water Supply Assessment based on the actual development trends as tabulated above, demonstrating that a compliant water supply system can be achieved to service the development site for all the planning horizons identified in The Greater Western Toowoomba Water Supply Study 2023 (Water Supply Study). The report is to demonstrate, as a minimum, modelling hydraulic results demonstrating pressure and flows, the external augmentations required to service the development and the timing of those works. Variations with the timing of infrastructure as identified in the Water Supply Study must be determined and any additional infrastructure requirements not currently included in the Water Supply Study must including timing and costings.

Council offers the opportunity to meet with the applicant to discuss this assessment of residential EP demand.

Response:

The network modelling undertaken by Council and submitted in support of the application demonstrates that the reticulation network has the capacity to supply the development to Council's desired standards of service in terms of pressure and flow, without any adverse impacts on the desired standards of service elsewhere in the network.

As discussed at various meetings with Council since the further advice letter, Council's concern in relation to water supply for the development is the limited capacity of the Glenvale reservoir and the need for the Mt Peel reservoir to be constructed. The construction of the Mt Peel Reservoir will:

- Remove the demand load of the existing Westbrook catchment from the Glenvale Reservoir, allowing the Glenvale reservoir to service further development in the Glenvale area up to the ultimate scenario beyond 2061.
- Transfer the demand load of the existing Westbrook catchment to the new Mt Peel Reservoir and allow for the further development of the Westbrook area (up to the ultimate scenario beyond 2061) to be serviced by the new Mt Peel reservoir.

Based on Council's Water Supply Study (2023), the Mt Peel Works were planned for 2036.

Council's further advice letter provides details of the actual demand load from a few recent development approvals in Glenvale. The information demonstrates that ~2300 EP that was planned for supply in the 2061 scenario in Council's Water Supply Study will now be required by 2036, if not earlier.

The calculations presented by Council above also do not include the non-PIA area of Gainsborough Lodge that received a Variation Approval in November 2025 (reference MCUI/2023/1992) which could further accelerate the requirement for Mt Peel reservoir.

Section 7.4 2036 Planning Horizon of the Water Supply Study states that:

"The Glenvale Reservoir does not have the capacity to supply the full PIA in the Glenvale area and there is insufficient land available at the existing site for a second reservoir. A new supply main and reservoir are therefore required for Westbrook."

Based on all the above information, other development approvals and other reports to Council, the Mt Peel reservoir will be required earlier than 2036.

Approval of the Fernleigh Variation Request would allow further development applications to create ~100 lots over the next 3 to 5 years. Approval of this development would only bring forward the requirement for the Mt Peel Reservoir by a few months at most.

If Council is concerned that there is insufficient water available from the Glenvale reservoir to meet the demand imposed by the future development of the Fernleigh Variation Request area, then there are several options available to ensure adequate water supply can be provided:

Option 1 - Council seeking funding through the next round of State Governments Residential Activation Fund (RAF) for the delivery of the proposed Mt Peel reservoir. Should the funding application be successful, the Mt Peel reservoir can be delivered by Council. This would remove any impediment relating to water supply.

Option 2 - Fernleigh funding the delivery of the Mt Peel reservoir under an Infrastructure Agreement arrangement with Council as has been presented to Council.

Option 3 – Alternative funding arrangements could be sought by Council through future grants.

Option 4 – Fernleigh and Council agree on a temporary solution such as a reservoir of adequate size, complete with a pump set, positioned within the footprint of the Fernleigh property that adequate services the proposed 100 lots until such time as the water supply from the Mt Peel reservoir become available. The temporary reservoir would be decommissioned and removed when the Mt Peel reservoir becomes available.

The purpose of this response is not to debate the merits of any of the above options, but to point out that there are many possible solutions available.

The water supply issue can be adequately identified and addressed in an approval of the Fernleigh Variation Request by applying conditions. There are many examples of such conditions in recent variation approvals.

As subsequent development approvals are required for any development to proceed, there is no risk to Council that development proceeds without resolving this issue. The solution to this water supply issue can be worked through as part of subsequent development applications.

2.0 Traffic

Aspect of Development:

The Traffic Impact Assessment (TIA) undertaken by RMA states the reporting has been undertaken generally in accordance with the requirements identified in the TMR Guide to Traffic Impact Assessment (GTIA). The TIA has assessed the Drayton Wellcamp Road/Boundary Street South intersection. The following matters need further consideration:

1. The 2027 AM background traffic includes traffic associated with a Ministerial Infrastructure Designation for a Catholic College on Shoesmith Road. There is no information showing how the College traffic was derived and how many classes are assumed to be operational in 2027.

2. The threshold level for investigation of the intersection is not reported. The threshold level in the GTIA is 5% of the base traffic for any movement in the design peak at the year of opening (i.e.2027). Council's analysis is that development traffic from 100 lots is exceeding 5% for several turn movements in the 2027 design year. Council's analysis is that the 5% trigger is exceeded once more than 67 lots are developed.

3. There has been no analysis of the operation of the existing intersection for the 2027 design year with development traffic. Council's analysis confirms the aggregate intersection delay with development increases delay to base traffic movement by 19% in aggregate. There is a significant worsening to the intersection, which is more than the desired outcome of less than 5% in aggregate recommended in the GTIA.

4. Lengthy delays (significantly greater than 42 seconds) occur for drivers turning right out of Boundary Street South in the AM Peak. The GTIA recommends priority control intersections should be upgraded for safety reasons under these circumstances. Solutions could include additional turn pockets, medians for two part turns or a complete intersection upgrade with a contribution towards the works.

5. The TIA assumes the quarry is currently not in use. There should be an allowance for continuing use of the quarry in the traffic signal analysis.

6. The Road Safety Risk Assessment has not assessed the risk scores against the risk items for the "with development" scenario and the "with development and mitigation" scenario.

7. The TIA determines the Drayton Wellcamp Road turn warrants for the intersection and states the existing configuration does not meet the warrant standards. However, this deficiency for the right turn lane on Drayton Wellcamp Road is ignored in the Road Safety Risk Assessment.

Further Advice:

Update the Traffic Impact Assessment (TIA) consistent with the methodology outlined in TMR's Guide to Traffic Impact Assessment (GTIA).

Demonstrate that the proposed yield does not exceed 5% increase in traffic.

If the proposal does exceed 5% increase in traffic, nominate how the development will reduce this below 5% or address the network infrastructure implications.

Response:

The Ministerial Infrastructure Designation for the Catholic College on Shoesmith Road included a traffic report. The MID application and traffic report outlined the staged rollout of school from opening

year to ultimate development. The assumptions used in the Fernleigh traffic report for the staged growth of the school traffic are consistent with those presented in the MID application and traffic report.

There are numerous traffic reports for approved developments that have identified that the Drayton Wellcamp Road/Boundary Street South intersection fails under background traffic conditions. It is clear that the intersection requires an upgrade regardless of whether development at Fernleigh proceeds or not.

Section 6.2 of the Fernleigh traffic report identifies a minimum upgrade to the Drayton Wellcamp Road/Boundary Street South intersection to address the failures under background traffic conditions. It also assesses this upgrade against the background with development scenarios and demonstrates that the upgrade can adequately accommodate the additional traffic from the Fernleigh development.

There are no traffic and transport engineering issues that would prevent Council from approving the Fernleigh Variation Request.

This letter is a complete response to Council's further advice letter, and we request Council proceed with approval of the Fernleigh Variation Request.

Yours sincerely,

Stuart Doyle
Partner | Principal Engineer
RMA ENGINEERS PTY LTD