



# Property Projects Australia

Date: 23 August 2019  
Our Reference: J000385  
Your Reference: MCUI/2018/2882

Attn: Geoff Broadbent – Planner

The Chief Executive Officer  
Toowoomba Regional Council  
PO Box 3021  
TOOWOOMBA QLD 4350

Dear Geoff,

Site Address: Vision Street and Pipe Street, WELLCAMP QLD 4350

Property Description: Lot 1, 4 and 14 on SP296139

Method of Distribution: Email [development@tr.qld.gov.au]

Development Application: Preliminary Approval including a Variation Request to vary the effect of the Toowoomba Regional Planning Scheme 2012

Correspondence Subject: Response to Statement of Outstanding Issues

We write on behalf of the applicant, *Witmack Industrial Pty Ltd*, regarding the abovementioned development application.

On 21 February 2019, a statement of outstanding issues was issued by *Toowoomba Regional Council*, as assessment manager. Please refer below for the applicant's response to this request.

We note that this information request response is to be considered in conjunction with the following detailed attachments:-

- Attachment A – *Economic Impact Assessment* prepared by Lawrence Consulting; and
- Attachment B – *Amended Preliminary Approval Document* prepared by *Property Projects Australia Pty Ltd*

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## OUTSTANDING ISSUES RESPONSE

At the outset, the applicant wishes to clarify fundamental concepts that underpin its proposal. These concepts are critical to understanding the need for a variation request but, also, for proper consideration of the proposed development.

1. What is an Innovation Precinct, like the TTP – Innovation precincts are “[*geographic areas*] where leading edge anchor institutions and companies cluster and connect with start-ups, business incubators, and accelerators. They are also physically compact, transit-accessible and technically wired...” (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 13). The precincts have a strong sense of identity with a focus on a particular competitive advantage or sector(s) (e.g. healthcare, agri-business, manufacturing, etc.). Through the creation of a built environment that fosters knowledge exchange and collaboration across multiple stakeholders, such as industry, research and development, education and government, the precincts drive advancements in technology and process, creating a more productive and resilient economy (Department of Industry, Innovation and Science, *State of Principles for Australian Innovation Precincts*, 2018, p10).
2. New Industries – The applicant seeks to establish a new precinct (or ecosystem) that will attract and support *new* industries that do not currently exist on scale within the Toowoomba region. The importance of building innovation into the Queensland economy, in particular, within regional Queensland, is recognised as part of the Advance Queensland Strategy (Queensland Government, *Building Our Innovation Economy*, 2019).
3. Clusters, Infrastructure and Location – The applicant is targeting two distinct industry clusters; ‘Technology Innovation’ and ‘Advanced Manufacturing’. To do this, the applicant must bring together technology driven businesses within a unique built environment that maximise the opportunities for businesses, small and large, to connect, collaborate and share knowledge within and external to their business. This requires a bespoke built environment outcome (at scale) with access to the highest quality digital and built infrastructure networks. Without the right settings (or ecosystem) there is no driver for the targeted industries to locate in the Toowoomba region. That is, the targeted industries do not locate in the Toowoomba CBD in the absence of the Toowoomba Technology Park (TTP), they locate within another region altogether.
4. Value Add – As demonstrated by the material provided, the TTP would have a *positive* impact on the Toowoomba region (outside of the TTP and including the Toowoomba CBD) through the creation of new (and next generation) employment opportunities, by attracting new investment and skilled talent to the region and, ultimately, by having a

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measurable (positive) impact on Gross Regional Product (GRP). Further, as outlined in the *NSW Innovation Precincts: Lessons from International Experience* (NSW Government, 2018) additional benefits of successful innovation precincts include:-

- a. *Collaboration and Commercialisation*: In Australia, a successful innovation ecosystem is associated with a 70 per cent increase in the likelihood of ‘new-to-world’ innovation (i.e. products that are created, commercialised and then introduced to the market). As such, the TTP will complement and (value) add to other major industries and infrastructure within the region (e.g. the education and health sector, Wellcamp Airport, Inland Rail, etc.).
  - b. *Productivity Gains*: Higher levels of innovation improve capacity to deliver, for example, new agricultural products and services, that reduce costs and improve productivity for the user. These gains then have positive flow on effects to living standards for the end consumer (e.g. through an improved or more cost-effective product).
5. AATLIS – Since the TTP development application was lodged, the applicant has expanded and refined its intent for the land surrounding the TTP. The broader precinct will be known as AATLIS and is intended to “...create productivity gains at every step of the agri-food value chain through digital technology adoption and circular economy collaboration.” (AATLIS, 2019). Whilst we acknowledge that, as required, separate development application(s) will be needed for the AATLIS precinct, the emergence of the AATLIS concept is relevant to this development application as it provides *Toowoomba Regional Council* with further context about the role and focus of the TTP within the Toowoomba region. In particular, it demonstrates that the applicant is focused on bringing a new sector to the Toowoomba economy.
  6. Need for a Variation Request – A Variation Request is required because the *Toowoomba Regional Planning Scheme 2012* does not contemplate an innovation precinct (outside of health and education clusters that are identified in the Strategic Framework). In particular, in this instance, the traditional ‘zoned based’ approach to land use planning, which segregates similar land uses into particular locations within a region, is prohibitive to achieving the mix of stakeholders that is required to make an innovation precinct succeed. To this end, restrictive land use zoning and regulation was identified by the NSW Government as a key barrier to the successful establishment and development of innovation precincts (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 48). Accordingly, a bespoke land use planning framework is needed to deliver a high quality built environment that will create good urban design outcomes that support knowledge exchange and collaboration, at scale.

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7. Impact Assessment – The development application is Impact Assessable and, under the *Planning Act 2016*, the assessment manager may exercise a broad planning discretion in deciding the development application. In this regard, it is noted that:-
- a. The proposed development application advances the purpose of the *Planning Act 2016*, because it:-
    - i. has no direct or significant impact on ecological processes or natural systems and, as an innovation precinct, its central focus is to facilitate further research and to develop and commercialise innovative solutions so that processes, such as food production, are improved to yield more with less impact on the environment;
    - ii. drives a diverse, resilient and strong economy at the local, regional and State level. Further, it supports the creation of a highly skilled workforce that is resilient and competitive within a global marketplace and which will provide opportunities that will attract talent to our region but, importantly, provide next generation career pathways for local talent, in Toowoomba.
    - iii. supports the attainment of a well-balanced, healthy and prosperous community by creating next generation employment opportunities and driving productivity gains which, ultimately, will deliver a more sustainable, affordable and efficient way of life for the Toowoomba region.
  - b. The application has established that it will deliver a public benefit, through a variety of means, and which ultimately reflected in the net positive impact to GRP.

As an example of the above, the applicant will establish a ‘Smart Farm’ on land adjacent to the TTP, within the broader AATLIS precinct.

In the TTP, different businesses and institutions will establish that will play a role (or roles) in the research, development, testing and manufacture of next generation agricultural machines and devices. These businesses will have office, research and/or industrial facilities within the TTP campus and have a unique opportunity to collaborate and exchange information with customers and suppliers, also located within the TTP. These businesses and institutions will then be able test and monitor machines/devices, within close proximity of the TTP.

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This integrated approach to the development and commercialisation of, in this example, devices and machines for agricultural application, can not be facilitated at scale in the Toowoomba CBD because:-

- the targeted industry sectors and the ecosystem that is proposed is new to the Toowoomba region and, therefore, current land use planning within the CBD does not support administration, research and development and manufacturing facilities within the same premises;
- the CBD would not support a *cluster* of industry sectors that have the access to physical and digital infrastructure that is required to; a) encourage these industries to locate in Toowoomba over other cities and regions; and b) support the future expansion of these industries.

Despite the above, where these industry sectors are allowed to establish within the TTP and the broader AATLIS precinct, there is *value added* to the Toowoomba CBD as support industries, not required or suited to establishment within the TTP, expand on the back of the growth of the TTP.

Therefore, in reviewing the following response to the Further Issues Notice, we request that *Toowoomba Regional Council*:-

- see the TTP as a positive value proposition that has the potential to attract new industry sectors to the Toowoomba region which will complement and, in turn, have a positive impact on the Toowoomba CBD by creating new employment opportunities and increasing productivity and wages growth.
- consider that, by restricting the types of activities that can occur within the TTP due to perceived potential impact on office demand within the Toowoomba CBD, there is a real prospect that the TTP ecosystem is not responsive to market demands and, in what is a regionally competitive marketplace, businesses critical to the ecosystem establish elsewhere (outside of this region).
- consider that the industries targeted by the TTP do not establish within the Toowoomba CBD in the absence of the TTP because the built environment and physical and digital infrastructure within the CBD would not support a cluster of these industries at any scale. Therefore, Toowoomba foregoes an opportunity to establish an innovation precinct that will create the next generation of employment opportunities and attract new investment to the region.
- see the TTP as an opportunity to support a new (but complimentary) sector that will leverage our regions existing skills, experiences and geography and create a new

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generation of employment opportunities, improving our ability to retain and attract new talent in research and technology sectors, supporting our regions higher and tertiary education sectors and ultimately increase our regions productivity.

For these reasons, in applying the wide discretion afforded to the assessment of impact assessable development applications under the *Planning Act 2016*, we request that *Toowoomba Regional Council* accept the significant benefits that the TTP will bring to the region and decide that the development application is in the public interest and, therefore, deserving of approval, subject to reasonable and relevant conditions.

### 1. Need - Office

#### Information Required

- 1.1 *The applicant is requested to provide additional documentation and/or amend the Preliminary Approval Document to resolve the above issue.*

#### Option 1 – Submit Further Information

*The applicant is requested to provide further information and justification in support of the proposed Office uses (in accordance with the definition included in Table 5.1 of the PAD), and other justification regarding the proposed Centre Activities (i.e. Child Care Centre, Food and Drink Outlet, Community Use, Function Facility) within the proposed PAA.*

*The submission of an updated Economic Needs Assessment, prepared by a suitably qualified and experienced person, in support of the establishment of the proposed Office and Centre Activity uses within the PAA may assist in providing the required justification.*

*The Economic Needs Assessment should include, but not be limited to, demonstration/investigation of the following:*

- *Impacts of proposed Centre Activities on existing centres (particularly the Toowoomba CBD);*
- *Consistency with the TRPS;*
- *Functional need for non-ancillary/subordinate Office uses to be located within the PAA.*

*The PAD should be amended to reflect the outcome of the Economic Needs Assessment. The amendments to the PAD should also incorporate the following changes:*

- *Amend the definition of TTP Office to limit the types of office and to more precisely reflect the allowable operational parameters (i.e. types of office where there is a demonstrated need for the use to establish within the PAA); and*
- *Amend the PAD, where relevant, to limit the extent (GFA) of TTP Office / Office within the PAA (particular note is made to Precinct B);*

#### Option 2 – Amend Proposed PAD

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*Amend the Table of Assessment for the TTP Zone to make Office / TTP Office subject to Impact Assessment. If this option is pursued, Office will not be identified as an appropriate use within the PAA. Any reference to TTP Office will be removed from the PAD and any future development application for Office will be subject to detailed impact assessment which may include assessment of economic need.*

## Applicant's Response

At the outset, and consistent with the broader themes outlined above, the TTP proposal is targeted at two district industry clusters that do not exist within the Toowoomba region at scale. Further, the built environment and physical and digital infrastructure within the Toowoomba CBD does not support the establishment of an ecosystem that will deliver a successful innovation precinct.

To this end, Item 1 of the Further Issues Notice:-

- appears to have misinterpreted the fundamental intent of the TTP, which is to attract two new and distinct industry sectors to the region, in a fit for purpose environment, and is not targeted at existing and traditional administrative (office) uses that are better suited to locate within the Toowoomba CBD;
- has misinterpreted *Table 4 of the Economic Impact of Proposed Toowoomba Technology Park*, dated March 2018. In particular, Council has read the 'Office' column vertically and in isolation of the 'Laboratory' and 'Industrial' columns also included in that Table. That is, a critical component to the success of an innovation precinct is that all components of the sector are in one bespoke built environment that facilitates the exchange of ideas and formal collaborations. An innovation precinct that does not have the right mix of activities and uses, is unlikely to attract the type and mix of businesses and institutions needed to succeed (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 47). Therefore, the inference that the 'Office' component could locate within the CBD is misplaced in two parts:-
  1. The 'Office' component does not establish within the Toowoomba region without the bespoke built environment that is the TTP; and
  2. The TTP can not succeed without being able to offer a complete ecosystem that can support a "...strong set of formal and informal networks and partnerships between people and businesses, researchers, education and training organisations and government." (Department of Industry, Innovation and Science, *Statement of Principles for Australian Innovation*

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*Precincts: Place Based Partnership Building on Competitive Strengths, 2018, p. 11).*

- does not acknowledge 'impact' in net terms. In this instance, when fully developed the TTP will, in net terms, have positive benefits for the Toowoomba region beyond the extent of the TTP (and including the CBD) through an additional 2,800 FTE employment opportunities, an addition 30 hectares of floor space requirements and improvements wage growth and productivity that, ultimately, contribute to a direct improvement in the regions gross regional product (GRP).

To further demonstrate the net benefit of the TTP development to the Toowoomba CBD, please refer to the revised *Toowoomba Technology Park: Analysis and Economic Impact Assessment* (Attachment A).

The report has been prepared by a suitably qualified expert, Mr Rueben Lawrence. The authors experience is demonstrated by the capability statement which details extensive experience in the field of economic impact assessment. The revised report:-

- Provides further examples of the type of tenant requirements that will drive the 'office' uses within the TTP (e.g. disaster recovery tenants, businesses and institutions related to 'smart' farming and agri-food innovation, etc.). These additional examples demonstrate:-
  - The types of 'office' user attracted to the TTP do not currently exist within the Toowoomba CBD at scale and, therefore, negative impacts on demand within the Toowoomba CBD are negligible; and
  - The 'office' requirements attracted to the TTP will not otherwise locate in the Toowoomba CBD at scale because the CBD can not offer a bespoke built environment that can provide digital and physical infrastructure and accessibility to people and businesses at the intensity and scale which define an innovation precinct.
- Demonstrates the positive indirect benefits to the Toowoomba region, that is, benefits outside of the TTP (including the CBD) that occur once the TTP is developed. These flow on benefits include an estimated 2,800 of FTE employment opportunities, 30 hectares of new land requirements and increases to wages and salaries. Collectively, the assessment demonstrates that the TTP will have a net positive impact on GRP and, therefore, demonstrates that the development of the TTP is in the public benefit.
- The non-residential uses within the TTP (such as child care and food and drink outlets) only service the TTP and will have no material impact on the ongoing viability of centres

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surrounding the Charlton and Wellcamp area. Further, research has established that such activities are critical components of successful innovation precincts, as they create a vibrant ecosystem that is required attract and retain businesses and talented workers (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 36).

Therefore, in response to the three (3) issues raised at Item 1 of the Further Issues Notice, the applicant has demonstrated that:-

1. The TTP will, in net terms, have a positive impact on the Toowoomba region, including the Toowoomba CBD, and the benefits delivered will not follow in the absence of the TTP;
2. The TTP is consistent with the strategic themes of the *Toowoomba Regional Planning Scheme 2012*, in particular:-
  - a. Sections 3.3.6 and 3.3.7 as the development is a bespoke built environment outcome, targeted at two distinct industries. The development does not involve the range or intensity of land uses envisioned for the Toowoomba CBD nor does it undermine the importance of the CBD to the regional economy. Rather, the development will have a positive impact on the CBD by creating new employment opportunities which will drive land/area requirements within the CBD and improve wage growth which will, in turn, drive population growth and increase household expenditure within the Toowoomba region. These benefits clearly support the specific land use outcomes for the CBD as it will improve the vibrancy of the CBD and support a range of retail, commercial, recreational and civic uses.
  - b. Section 3.5.1 as the TTP will broaden the employment opportunities within the Toowoomba region, particularly next generation employment within the technology and research and development sectors. These employment opportunities, not currently available within Toowoomba on scale, will support population retention, particularly within younger population cohorts, which will have a positive impact on community identity and diversity. The need to drive innovation and futureproof the Queensland economy, particularly in regional areas, is recognised within the *Advance Queensland Strategy* (Queensland Government, *Building Our Innovation Economy*, 2019).
  - c. Section 3.8.5 as the creation of a regionally significant innovation precinct will attract further investment in information and communications technology – which will drive productivity and ensure businesses and institutions (such as health and education), remain competitive within a global environment.

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- d. Section 3.9.1 as the TTP will directly result in a broadening of the employment opportunities within the region, including next generation employment opportunities;
  - e. Section 3.9.1 as the establishment of an innovation precinct is progressive and will have a direct positive impact on GRP and, therefore, clearly contributes positively to the health and wellbeing of both urban and rural communities within the Toowoomba region.
  - f. Section 3.9.4 supports the creation of knowledge based activities and supports innovation and clusters of science, technology, health, education and training. The TTP will create such an innovation cluster that is supported by a bespoke built environment and adequate physical and digital infrastructure.
3. For an innovation precinct to be successful, it requires a complete ecosystem that promotes proximity and collaboration between all stakeholders required to respond to a particular issue or market pressure (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 22). Removing a particular component or stakeholder, such an activity or stakeholder that may be defined, under planning legislation, as an 'office', would compromise the ecosystem. To this end, 'TTP office' is a critical component to the success of the broader ecosystem and must be able to locate within the TTP. Further, as outlined above, the office uses that will establish at scale within the TTP, do not establish in the CBD in the absence of the TTP, they establish within a different region altogether where flexible and adaptive planning settings support innovation.

## 2. Levels of Assessment

### Information Required

- 2.1 *The applicant is requested to provide further justification for the reduced levels of assessment as detailed above. The applicant is advised that any development involving building works is required to be assessed at a minimum Code Assessment*

## Applicant's Response

As outlined above, the provision of flexible and adaptive land use planning frameworks has been identified as a key factor for successful innovation precincts (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 07).

Equally, where land use planning is restrictive, the ability for open and immediate knowledge exchange and collaboration is reduced and additional barriers, such as time and cost, are

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introduced which impact on the establishment proposition for new entrants to the precinct (e.g. start-up businesses).

The Further Issues Notice makes repeated reference to the non-residential uses identified within the Preliminary Approval Document (PAD) as being inconsistent with the Medium Impact Industry Zone. These references are obsolete and are the reason that a Variation Request is sought (i.e. the current planning scheme framework does not support the efficient and orderly establishment of an innovation precinct and, therefore, its provisions need to be varied).

The applicant supports, and is driven to achieve, high quality placemaking and urban design outcomes as these elements are also critical to the success of an innovation precinct. To this end, the applicant maintains that the design controls provided within the PAD will provide a design outcome that exceeds the “...baseline requirements of the TRPS.”

In addition to built form and landscape controls, the PAD has adequate measures to ensure that the environment within the TTP (including noise, air quality, odour, etc.) is acceptable and that reverse amenity impacts within the TTP are avoided or appropriately managed.

Further to the above, the proposed changes to the category of assessment have no impact on Council to impose an infrastructure charge or to regulate compliance with any development approval that may be granted.

In light of the above, in this instance, it is appropriate to utilise the existing planning legislation and engage the ‘accepted development’ pathways proposed as:-

1. The PAD provides sufficient design controls to achieve a bespoke, high quality and safe urban design outcome;
2. Inflexible and restrictive land use planning controls have been demonstrated to be a key risk factor for the establishment of innovation precincts internationally (NSW Government, *NSW Innovation Precincts: Lessons from International Experience*, 2018, p. 07);
3. There is no material benefit to the public or the applicant to process a Code Assessable development application, where the design settings within the PAD are acceptable.

To this end, the applicant seeks to maintain the current category of assessment tables but, as required, is willing and agreeable to meet with *Toowoomba Regional Council* to clarify any outstanding concerns relating to the proposed design controls.

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### 3. Preliminary Approval Document

#### Information Required

- 3.1 *The applicant is requested to provide an amended PAD that nominates the relevant TRPS assessment benchmarks (ie. TRPS Development Codes) for each aspect of development as assessment benchmarks within the Tables of Assessment of the PAD.*
- 3.2 *The applicant is requested to clearly identify within the proposed PAD any changes to the relevant TRPS assessment benchmarks. It should be clearly articulated within the PAD Development Codes where the applicant proposes to vary Acceptable Outcome(s) / Performance Outcome(s) / Overall Outcome(s) / Purpose(s) of the assessment benchmarks of the TRPS.*
- 3.3 *The applicant is requested to submit an amended PAD which responds to the above issue by ensuring that the Purpose statements, Overall Outcomes, Performance Outcomes and relevant Acceptable Outcomes for the TTP Zone appropriately reflect the type of development that is supported within the PAA.*

*Note: Amendment of the PAD to appropriately respond to Item 3.3 will be dependent on the overall changes to the PAD that result from response to this Outstanding Issues letter.*

#### **Applicant's Response**

With respect to Item 3.1, as outlined earlier within this response, there would be no need to lodge a Variation Request if the current provisions of the planning scheme and related assessment benchmarks supported a built environment outcome that would deliver a successful innovation precinct, at scale.

To this end, amending the PAD to reference the development codes of the current *Toowoomba Regional Planning Scheme 2012* is contrary to the purpose of a Variation Request.

In relation to Item 3.2, it is not the purpose of the PAD to identify the provisions of the planning scheme that are varied by the development application. The PAD is a standalone document to be used in the assessment of a future development of the land. The proposed variations to the planning scheme were summarised at Table 6 of the original town planning report.

With respect to Item 3.3, as above, the Purpose and Overall Outcome statements included in the Preliminary Approval Document intentionally depart from the *Toowoomba Regional Planning Scheme 2012* because, in its current form, it does not support the establishment of an innovation precinct.

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#### 4. Definitions

##### Information Required

4.1 The applicant is requested to amend the definitions for “Primary Road Frontage” and “Secondary Road Frontage” included as part of the amended PAD to clearly specify that the terms may relate to a ‘driveway’, should the development be undertaken as part of a Community Titles Scheme.

It is further requested that a road layout plan be provided which clearly articulates the relevant road hierarchy over the proposed PAA.

Note: Where the TTP Codes require that development is appropriately setback from lot boundaries and/or frontage/s it will be necessary for the Code/s to be amended to ensure that development is appropriately setback from internal circulation driveways, particularly driveways created as part of Community Title Subdivision.

4.2 The applicant is requested to provide justification as to why the “Development Lot” should be supported as a defined term in the PAD in context of the conflict with the definition of “Lot” included in the Planning Act 2016.

#### Applicant’s Response

The definition for Principal Road Frontage and Secondary Road Frontage has been amended, as requested, to refer to Principal Driveway and Second Driveway.

The applicant has removed the ‘Development Lot’ definition but included a clarification that ‘Lot’ excludes a Common Property lot. This variation is included so that, for example, the communal car parking provisions do not apply to the creation of a Common Property lot, which generates no car parking demand itself.

An amended Preliminary Approval Document is provided at *Attachment B*.

#### 5. Consistency of Language

##### Information Required

5.1 The applicant is requested to amend the PAD to ensure there is consistency of language, with particular consideration to the above listed issues.

Where ‘roads’ are proposed these should be consistently referred to as either a ‘Principal Road’ or ‘Secondary Road’ and where ‘driveways’ are proposed these should be consistently referenced.

Note: Where Principal Roads, Secondary Road and Driveways are proposed as part of the PAD, definitions and Typical Cross Sections plans should be provided for each.

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## Applicant's Response

Please refer above, the definition has been amended to refer to the internal driveway network and cross-sections of the same are provided at Appendix E.

### *6. Stormwater Management*

#### Information Required

*6.1 The applicant is required to amend the Stormwater Management Plan to reflect the above stormwater requirements. Remove the reference to PSP No. 3 within Acceptable Outcome and reference PSP No. 2 Engineering Standards Roads and Drainage Infrastructure, and the State Planning Policy water quality objectives.*

## Applicant's Response

It is requested that a condition is imposed on any development approval that may be granted which requires that, prior to any assessable development occurring in accordance with the Preliminary Approval Document, a revised stormwater management plan is submitted to, and endorsed by, Toowoomba Regional Council.

## SUMMARY

This development application represents an opportunity for Toowoomba Regional Council to support private enterprise in the delivery of a precinct that will drive innovation within our traditional strength areas, such as agriculture, resources and manufacturing.

Increased innovation within the Toowoomba economy will ultimately create new and next generation employment opportunities, increase productivity and resilience and, ultimately, support a better standard of living for the next generation.

Whilst, on face value, the development is inconsistent with the traditional planning regulations that currently apply within the Charlton-Wellcamp area, for the reasons outlined above, the development application does align with the strategic intent of the planning scheme, as it supports the sustainable development of the Toowoomba region.

The development application is subject to impact assessment and therefore, in deciding the development application, the assessment manager can apply a broad planning discretion. In this regard, we note that the development application advances the purpose of the *Planning Act 2016* and, ultimately, will have a net positive and public benefit for the Toowoomba region.

#### Toowoomba

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Accordingly, we request that the development application is approved, subject to reasonable and relevant conditions.

Whilst we trust this information is sufficient to enable you to progress with a decision in relation to this application, please do not hesitate to contact the undersigned on (07) 4632 0516.

Yours faithfully,  
Property Projects Australia Pty Ltd



JAMES JUHASZ  
Director

Enc. Attachment A – Economic Impact Assessment  
Attachment B – Preliminary Approval Document