

18 June 2026

**Our File Ref:** SEQ-T-26-017 - TL002

**Contact:** Steve Williams

Toowoomba Regional Council  
PO Box 3021  
Toowoomba Qld 4350

Attention: Emily Hinchliffe

**RE: CHILD CARE CENTRE PARKING ASSESSMENT  
140 KLEINTON ROAD, HIGHFIELDS**

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Jalahawi Consulting has been retained to undertake an assessment of the proposed Child Care Centre situated at 140 Kleinton Road, Highfields. The assessment has been undertaken to address issues associated with the parking system and the interaction of this with the conditions of the approval that include a cap on the number of FTE's for the subject site. A previous traffic submission was made by this office and we understand that there has been feedback received from Council that have requested further information with respect to the parking demand assessment and also the development of a Staff Parking Management Plan.

This letter has been prepared in response to these issues.

As part of this assessment we have undertaken a review of the relevant matters pertaining to the parking provisions for the subject land and more specifically, the constraints that have become apparent as a consequence of the conditions of approval as shown following:

**A. ASSESSMENT MANAGER'S CONDITIONS:**

**PLANNING**

**APPROVED USE**

1. This Development Approval is for a Material Change of Use for Child Care Centre as follows:
  - 1.1 Maximum of ~~140-132~~ **127** Children; and
  - 1.2 Maximum of ~~23-21~~ **24** Full-time Equivalent Staff.
2. This Development Approval does not imply or comprise an approval for any uses other than that listed in Condition 1.]

It is our understanding that due to other regulatory requirements with respect to staffing levels the preference is that the cap on the staffing such that the full number of on-site children permitted under the approval, and as contemplated by the application, can be realised.

The approved plans provide for a total 40 on-site carparks as per the requirements of Condition 91 of the Council approval package.

## **1.0 Project Description**

The project involves a Child Care Centre development situated at 140 Kleinton Road, Highfields and has commenced operation albeit not completely operational in terms of the number of children. As noted above, the approval has included a number of conditions that related to the parking provisions and the associated student and staff numbers allowed on the subject site at any one time.

The current proposal is for the development to move to finalisation of the development including opening the last of the rooms within the Child Care Centre site. As noted however, the complexities of the staffing provisions has resulted in the conditions relating to the maximum number of FTE Staff on-site being impossible to achieve in conjunction with the maximum number of children.

This report identifies the suitable justification for the parking provisions on the site based on the application of parking based on the number of student enrolments, the universally adopted approach. This assessment has also provided an indicative Staff Parking Management Plan that could be applied to the project.

## **2.0 Child Care Centre Parking**

### **Planning Scheme Methodologies**

While there has historically been some planning schemes that have included references to the staff numbers we note that it is generally accepted that the parking rates are more easily and routinely tied directly to the children numbers only and that some contemporary planning scheme are moving toward these style of parking rates. We note the following rates from other Councils in the South East that have adopted a parking rate based on children

- Brisbane City Council - 1 space per 5 children
- Sunshine Coast Regional Council - 1 space per 3.6 children
- Gold Coast City Council - 1 space per 4 Children

We provide this only as an example of the approach to linking parking provisions solely to the student numbers and in support of my view that that this is an appropriate way to determine parking provisions for a site.

It is relevant to note that, while there are differences between the three aforementioned Councils' and Toowoomba Regional Council, the application of the parking rates noted would be easily met by the current development with the full take up of on-site children at 127.

### **Parking Demand Surveys**

It has been the experience of Jalahawi Consulting that when undertaking survey data collection specifically for Child Care Centres, the peak parking demands are universally adopted based solely on the number of children. This link to the student numbers is also routinely the rates that have been applied in planning schemes as noted above.

Given the regulatory requirements around staff/student ratios it is reasonable to expect that the relevant parking ratios are also capturing staff parking requirements and anticipated demands.

It is noted that rates can vary depending on the site and its proximity to residential areas, public transport and active transport facilities.

Relevantly to the current project we have obtained parking demand data related to other child care centres from recent Planning & Environment Court Appeals where parking demands for Child Care Centres have been subject to expert consideration. It is noted that these surveys included an assessment of the parking demands associated with student populations at the Centres surveyed.

Some of these are discussed following noting the general location of the appeal only and not the specific centre.

#### **Appeal 1 - Sunshine Coast Region (2021)**

- This involved a 112 place child care centre on the Sunshine Coast
- The traffic engineering evidence presented by the experts included surveys of five (5) other child care centres within the Sunshine Coast
- The parking demands from the parking surveys undertaken varied between:
  - 1 space per 3.28 children
  - 1 space per 4.47 children
- Based on the worst case above and applying this to the 127 children capacity of the subject centre we would expect a parking demand of 39 parking spaces.

#### **Appeal 2 - Toowoomba Region (2025)**

- This involved a 134 place child care centre within the Toowoomba Region.
- As part of a report provided as part of the expert evidence process, traffic engineering expert Stuart Holland prepared a report that dealt with the parking associated with the use. In addressing this he captured contemporary parking data from four (4) centres situated within the Toowoomba Region.
- The parking demands from the parking surveys undertaken, based on the actual number of children in attendance (the correct metric to measure demands in my view) varied between:
  - 1 space per 3.45 children
  - 1 space per 6.9 children
- Based on the worst case above and applying this to the 127 children capacity of the subject centre we would expect a parking demand of 37 parking spaces.

In our view, based on over 30 years' experience in preparing traffic assessment and over 20 years of giving evidence in the planning and environment court as a traffic engineering expert, the adoption of

parking demands directly associated with other similar operating land uses is the preferred method for determination of appropriate parking demands for a land use.

The use of contemporary data from other similar uses within the general area/region are clearly also the most appropriate and provides directly relevant data upon which to determine appropriate parking rates for a development proposal. It is broadly recognised and accepted, in the "hierarchy" of data sources for estimating parking demands and traffic generation, that this is the preferred methodology where relevant data can reasonably be obtained.

### 3.0 Parking Demand Analysis

As noted above, in the hierarchy of parking and traffic generation assessments the use of current data from the local area is the most appropriate form of data to demonstrate parking demand rates and traffic generation rates. As such we have assessed the likely worst case demand likely to be experienced at the subject site based on contemporary data reported above from within the Toowoomba Region.

This assessment is outlined below.

- Current Maximum Enrolment Capacity - 127 children
- Worst Case Maximum Parking Demand Rate - 1 space per 3.45 children
- Worst Case Park Parking Demand - 37 car parking spaces

On the basis of our assessment, and through the consideration of the data presented in the second of the examples noted above outlining contemporary Toowoomba Region Data, the application of even the worst case parking demands would result in the requirement for the subject development to provide just **37 parking spaces**.

As noted previously the subject development provides 40 parking spaces on-site in accordance with Condition 91 of the approval.

It is clear that the development will meet and even exceed the anticipated parking demands and as such we are of the view that the removal of the part of Condition 1 that caps the FTE staffing numbers can reasonably be removed without having any implications for the subject development and the surrounding street system.

### 4.0 Staff Parking Management

It is noted that the site provided a total of 40 parking spaces and it is clear from the parking demand analysis undertaken that the worst case parking demand is likely to be a maximum of 37 cars parked on site at any one time. On that basis it is apparent that the parking system proposed as part of the project, including staff parking, will be adequate for the likely demands.

We note that Council has requested a Staff Traffic Management Plan be established for the Centre.

We have prepared and provided an outline of a parking management plan that could be implemented. It is noted that this is an initial conceptual management plan and will be finalised by the owner and centre manager using this as an indicative template.

## **5.0 SUMMARY**

We understand that there are existing conflicts between the Conditions of the development, and in particular the maximum FTE staff numbers identified in Condition 1 of the approval, and other regulatory requirements.

While it is recognised that the Councils current planning scheme does utilise staff numbers and children numbers in the derivation of the parking provisions required by Child Care Centres, I am of the view that the use of contemporary parking demand data from similar local centres, tied solely to children numbers, is entirely appropriate.

As noted in this letter recent data collected as part of a planning and environment appeal clearly demonstrates that the 40 parking spaces provided on-site for the proposed use, based on the maximum of 127 children on the site, would be likely to cater for the peak parking demands for the Centre.

Yours faithfully,



**Steve Williams** BE(Civil), FIEAust, RPEQ.

Director

Jalahawi Consulting Pty Ltd

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Indicative Staff Parking Management Plan

# Staff Parking Management Plan

**Facility:** Kleinton Road Child Care Centre

**Address:** 105 Kleinton Road, Highfields

**Date:** June 2026

## 1. Objectives

The primary objectives of this Staff Parking Management Plan (SPMP) are to:

- **Prioritize Safety:** Keep traffic flowing predictably to protect children and parents during high-turnover drop-off and pick-up hours.
- **Optimize Site Capacity:** Efficiently utilize the 40 total on-site parking spaces without creating bottlenecks.
- **Maintain Operational Integrity:** Ensure key service areas (like turnaround bays) remain entirely unobstructed.

## 2. Allocation of Parking Spaces

The site features a total of **40 parking spaces**, strictly allocated as follows:

Parking Category	Number of Spaces	Designated Location	Permitted Users
Staff Parking	21	Dedicated Staff parking spaces to the rear of the parking area	Staff Only Full-time/Part-time (‘rostered on’ staff only)
Visitor / Parent Parking	19	Visitor parking spaces at the front of the site parking area	Parent/carer dropping off/picking up a child

## 3. Crucial Parking Rules

The following are some of the key operational requirements that must be observed by all staff of the facility to ensure safe and efficient operation of the site.

- **No Visitor Bay Overflow:** Staff are **strictly prohibited** from occupying any of the 19 dedicated visitor parking spaces during operational hours.
- **Turnaround Bays:** Staff must not park in or block the dedicated turnaround bays situate adjacent to the staff . These areas must remain clear at all times to allow safe vehicle manoeuvring.

#### 4. Tandem Parking Protocol

Of the 21 allocated staff spaces, four (4) are configured as tandem (stacked) parking spaces (8 spaces in total). To prevent staff from blocking each other in and disrupting operations, the following rules apply:

- **Fill Rear Bays First:** The first staff members arriving for their shifts must park in the rear spaces of the tandem bays.
- **Shift Manager Notification:** Immediately upon parking in a tandem space, the staff member must advise the relevant Shift Manager of which space they have occupied. This ensures quick vehicle relocation if a shift change occurs.

At no time should one of the rear parking spaces be left vacant in favour of utilisation of one of the front parking spaces unless this is pre-arranged with the Shift Manager as part of the parking management approach when potential staff change times are known and this will not materially impact maximum utilisation of the staff parking system.

#### 5. Peak-Period Traffic Management

To prevent congestion at the entrance and within the car park layout, the following protocols must be adhered to:

- **Staggered Arrivals:** To the extent practical, staff shifts should be aligned so that arriving employees parking in tandem spaces do not block parents during the peak morning rush.
- **Key Handover:** Staff parking in the front position of a tandem space must ensure their keys are easily accessible or left with the relevant Shift Manager if their shift ends later than the person parked behind them.

#### 6. Compliance and Induction

The following compliance and induction processes will be established by Centre management and will continue to be applied through the life of the Centre.

- **Staff Induction:** Every new employee will be walked through this parking layout on Day 1. They must acknowledge the tandem parking protocol and the strict rule against using visitor bays or turnaround zones.
- **Review:** This plan will be reviewed annually to ensure the 21 designated staff spaces are being utilized effectively and safely.

**Approved By:** \_\_\_\_\_ (Centre Director)

**Date:** \_\_\_ / \_\_\_ / 2026