

Our Reference: MCUI/2025/338
 Contact Officer: Emily Hinchliffe
 Contact: (07) 4698 3876
 Email: development@tr.qld.gov.au

FURTHER ADVICE
Planning Act 2016 Section 68
Development Assessment Rules Section 35

George Weston Foods Ltd
 C/- Precinct Urban Planning Pty Ltd
 PO Box 3038
 TOOWOOMBA QLD 4350

Email: Andrew@precinctplan.com.au

1 October 2025

Dear Sir

Development Application for: **Material Change of Use – Impact – Preliminary Approval for a Variation Request**
Location: **213-369 Goombungee Road, 65-103 Griffiths Street, and 6-14 Bacon Street, HARLAXTON QLD 4350**
Property Description: **Lot 12 SP199160, Lot 409 D1020, Lots 1–7, 10 & 12-16 RP17530 and Lot 411 RP810590**
Relevant Planning Scheme: ***Toowoomba Regional Planning Scheme 2012***

Upon review of the information request response submitted by the applicant in respect of the abovementioned application; and in response to issues raised in submissions made in respect to the application, Council requires additional information in relation to the application.

Overall, Council recognise that the site is a key greenfield area, located in proximity to Toowoomba’s CBD as well as the new Toowoomba Hospital and Baillie Henderson Hospital campus and adjoins key transport corridors (Railway, Second Range Crossing and key Pedestrian Network such as Toowoomba Central Active Transport Link). Accordingly, the location presents a significant opportunity for a new residential subdivision that can be developed based on best practice urban design and sustainability principles. The development is generally in accordance with the planning intentions of this area; however there are fundamental issues which remain outstanding and that potentially impact upon the ability for the development to be achieved in a manner consistent with the strategic objectives of the Planning Scheme.

1. ADJOINING HIGH IMPACT INDUSTRY ZONE

	<i>Issue: Interface with adjoining High Impact Industry Zone</i>
	It is acknowledged that the adjoining site to the West (Lot 1 on SP116255) has a current application (MCUI/2019/5122) before Council which is within the Information Request Response period.
1.1	Despite the application, the site is within the High Impact Industry Zone which substantially impacts the ability of the site to be developed for residential development as proposed. The Planning Scheme is clear in the requirement to protect incompatible uses from establishing in proximity of each other. In particular, the Strategic Framework Land Use Strategy 3.3.12.2 (3)(b) requires a 500m separation distance between High Impact Industry zoned land and areas zoned for sensitive uses to ensure impacts (air, noise, odour and hazardous materials) are contained within the site, designated area, estate or zoned areas, or are mitigated or avoided (3.3.12 (1) and (2)).

	<p>In its current form, the Variation Document does not sufficiently address the issue and instead, relies upon the adjoining site to the West being developed for commercial purposes, without regard to the current zoning of the site as High Impact Industry. This underlying assumption fundamentally affects ability for the site to be developed as intended under the Variation Document and the outcomes sought for the do not address reverse amenity issues, built form outcomes, connections between sites and commercial need.</p> <p>The applicant suggested several resolutions to overcome this issue as part of the information request response. Upon review, it is Council's position that such options are not supported.</p>
	<p>Action required:</p> <p>It is Council's preference that the adjoining site is integrated with the current application to avoid reverse amenity issues associated with the adjoining Industrial land uses.</p> <p>Alternatively, the Variation Document is to be amended to reflect and address the sites current zoning as High Impact Industry with particular regard to reverse amenity issues likely (see specific issues in Item 5).</p>

Should the above issue be resolved, further information is then required in relation to the ultimate development, to inform longer-term infrastructure and strategic planning in respect to adequate open space areas, provision of pedestrian and public transport, key pedestrian linkages as well as built form outcomes.

2. MASTER PLANNING

	<p>Aspect of development: Master Planning</p> <p>Additional information is required with respect to the relationship between the Structure Plan and intended development of the site, having regard to broader strategic objectives and existing and proposed development; which has changed since the original development was conceived.</p> <p>For example:</p> <ol style="list-style-type: none"> i. The Community Precinct is located on the edge of the site on Goombungee Road, a location not readily accessible for all residents of the subdivision, except by car which appears inconsistent with the intent for precincts/residential areas to have a <i>'high quality streetscape and public open space network that comprises connected public spaces and parks, and links to key community activities'</i>. ii. The Structure Plan identifies a Local Park node, without demonstration of the dimensions and ability to achieve the minimum standards of service above the 1% AEP. iii. The extent of residential development has not been quantified, nor the final densities provided to inform the likely services necessary to support the <i>'compact and walkable neighbourhoods that are well connected to employment nodes, centres, open space and recreational areas, community services and educational opportunities.'</i> iv. There is no provision for centralised non-residential development to service the residential component, as there is reliance upon the western side being developed. v. Opportunities to provide strategic vehicular and pedestrian connections, having regard to the development of the hospital site and higher order connections to the north are not provided for. vi. The built form of the site is not well understood, with each precinct having similar densities (averaged) and how this relates to adjoining (existing and proposed) development is unclear. vii. There is no consideration of the continued operation of industrial zoning to the south and west of the site, and how that impacts upon the ability of the site to achieve the residential built form intended.
2.1	<p>Information Required:</p> <p>Provide:</p> <ol style="list-style-type: none"> a) Further information in respect to how the spatial area for each precinct was informed (topography, construction cost, infrastructure provision, views, pedestrian/vehicular connections, amenity etc).

	<ul style="list-style-type: none"> b) Ultimate densities and mix of attached and detached dwellings in respect to each precinct (low/medium/high scenarios); c) A potential staging plan having regard to infrastructure provision and land dedications; d) A Structure Plan which details dimensions/areas for each precinct. In particular, <ul style="list-style-type: none"> i. Show an area of 40m x 50m above 1% AEP within the Open Space precinct and maximum grade of 1:30 and an active transport corridor above the 1% AEP. ii. Clarify that the open space area along Griffith Street is in fact a drainage reserve/buffer area primarily as it does not meet the requirements for open space. e) Provide further information with respect to the potential need for a commercial precinct to service the ultimate population, without reliance upon the adjoining site to the west being developed for commercial purposes. Consider providing further flexibility for the establishment of a Local Centre within the site and provide justification of the location of any Local Centre with respect to the wider Structure Plan (i.e. walkability and accessibility). f) Consideration of minimum densities within the Medium Density Precinct to achieve overall outcomes sought for the precinct. g) Consideration of the expansion of Medium Density Precinct along the northern section of the site. h) Consideration of intended heights within each precinct relative to the density sought; i) Provide a cross section sketch or built form outcomes 'intended' for the area to better illustrate the design outcomes across each precinct, particularly for the Medium Density Precinct and the interface with adjoining precincts. j) Consideration of how the management of potential reverse amenity impacts are addressed in the VSD without impacting upon the use rights of the industrial development to the south and west of the site (see item 4 for further details) k) Further consideration of the proposed pedestrian access between the site to Mort Street. It is suggested that section 3.2.5B of the VSD is amended to specifically reference the connection and to take into account the TCATL link.
--	---

3. TRAFFIC

3.1	<i>Aspect of development: Intersection Delay Analysis</i>
	The Information Request Response regarding intersection delay analysis has amended the background traffic volumes compared to that provided in the original Traffic Impact Assessment. The background traffic now excludes the impacts of traffic from the Baillie Henderson Hospital expansion.
3.2	<i>Further Advice:</i>
	Amend the Traffic Impact Assessment to include the background traffic associated with the Baillie Henderson Hospital including an updated SIDRA analysis and changes required to concept sketches of the intersections.
3.2	<i>Aspect of Development: Road hierarchy</i>
	There are two distributor roads shown in the road hierarchy however the projected traffic volumes are less than 3,000vpd which suggests they could operate as collector streets. The northern access on Goombungee Road (Access #3) should connect directly to the internal collector street and also be nominated as a collector street.
3.3	<i>Further Advice</i>
	Amend the internal road hierarchy on the Structure Plan and replace the distributor roads with collector streets. Show a direct collector street connection between the internal collector street and Goombungee Road at the northern access to Goombungee Road.
3.3	<i>Aspect of Development: Bacon Street Closure</i>
	The Structure Plan does not show the intention to close the Bacon Street/Goombungee Road intersection.
3.3	<i>Further Advice</i>
	Amend the Structure Plan to show the intention to preclude access from the Subject Site to Goombungee Road along the existing Bacon Street alignment.

4. ACOUSTIC IMPACTS AND VISUAL AMENITY

4.1	Aspect of development: Noise
	The noise report includes recommendations that are very dependant on acoustic mounds or fences to mitigate rail and industrial noise. While such measures could be built, they will create a large visual impact on how the site will present to the surrounding areas, long term maintenance burden and likely limit what landscaping can occur (shading).
	Further Advice: Provide an amended Noise Report, VSD and Plans which: <ul style="list-style-type: none"> a) Confirm if final ground level of dwellings will be above Griffth St and any amendments to the barrier proposed to achieve compliance; b) Demonstrate how the height of acoustic barrier fences would impact visual amenity and presentation of the site to the community; c) How landscaping will complement any attenuation measures required; and d) Ownership and ongoing maintenance of such attenuation measures.

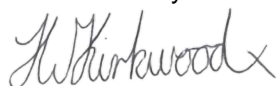
5. REVERSE AMENITY IMPACTS (Where not otherwise addressed by Item 1)

5.1	Aspect of development: Noise
	The submitted noise report assumes that the adjoining site to the west is to be developed for commercial purposes only. However, the current zoning is High Impact Industry which substantially impacts the ability of the site to be developed for residential development as proposed.
	Further Advice: Amend the Noise Report to address Industrial noise from Mort St.
5.2	Issue: Reverse amenity – Air Quality
	An air quality assessment was not submitted by the applicant and assumes the site to the West is developed for commercial and not industrial purposes.
	Further Advice Amend the VSD to ensure that Air Quality issues that may arise from the existing High Impact Industry Zone to the west are appropriately addressed.
5.3	Issue: Reverse amenity – Odour
	The application does not address odour from industrial uses to the west.
	Further Advice: Amend the VSD to ensure that Odour issues that may arise from the existing High Impact Industry Zone to the west are appropriately addressed.

Provide one electronic copy of the response to Council, including any plans or supporting information.

In accordance with section 35 of the *Development Assessment Rules*, the statutory timeframes do not stop for this application. It is therefore suggested that the applicant stop the clock provisions under s32 of the DA Rules, to allow sufficient time for you to consider and respond to the advice; and for Council to consider any new or changed material provided. If you decide not to respond, Council will proceed with the assessment of the application based on the information currently available.

Yours faithfully



Joseph Kirkwood
Manager, Planning Branch

CC toowoombasara@dasilgp.qld.gov.au