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23 May 2026

The Chief Executive Officer
Toowoomba Regional Council
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Toowoomba Qld 4350
Via Email: development@tr.qld.gov.au

RECEIVED
25/05/2026
TOOWOOMBA
REGIONAL COUNCIL

RE: DEVELOPMENT APPLICATION OBJECTION SUBMISSION

Application Reference: RAL/2025/5338

Proposal: Combined MCU & RAL – Child Care Centre and Reconfigure 1 into 2 Lots

Property Location: 1A Cawdor Road, Highfields QLD 4352

Dear Sir/Madam

I am writing to formally lodge my objection to the proposed development application (Reference: RAL/2025/5338) for a Child Care Centre and a 1 into 2 lot subdivision at 1A Cawdor Road, Highfields. As a resident whose property directly adjoins the subject site, I am deeply concerned that this proposal compromises my immediate residential amenity, poses significant safety risks, and conflicts with the established planning benchmarks for this precinct.

My specific grounds for objection are detailed below:

1. Severe Health and Safety Risks Due to Adjacency to a Service Station

The subject site at 1A Cawdor Road sits directly adjacent to an operational service station. Co-locating a highly sensitive land use—specifically a Child Care Centre catering to vulnerable, developing infants and young children—next to a fuel outlet presents unmitigated environmental health and safety hazards:

- **Air Quality and Toxic Volatile Emissions:** Fuel stations continuously vent Volatile Organic Compounds (VOCs), including benzene, toluene, and xylene, during vehicle refuelling. Young children have higher respiratory rates and

developing immune systems, making long-term exposure to these airborne carcinogens in outdoor play areas an unacceptable health risk.

- **Hazardous Material and Explosion Risks:** Service stations store thousands of litres of highly flammable fuel. Introducing a high-occupancy facility for children—who cannot independently evacuate in an emergency—directly inside the impact or blast radius of a potential fuel fire or vapour ignition violates basic risk-minimisation planning principles.
- **Compounded Traffic Conflict:** Merging the erratic traffic profiles of fuel-seeking vehicles (including heavy rigid delivery trucks) with families negotiating child drop-offs creates an incredibly chaotic and high-risk environment for pedestrian children in the immediate vicinity.

2. Traffic Congestion and Road Safety Along Cawdor Road

Cawdor Road is already experiencing a severe increase in vehicle volumes due to ongoing large-scale residential subdivisions in the immediate vicinity, including the major 97-lot development at 49 Cawdor Road. A Child Care Centre inherently generates high-volume, high-frequency "drop-off" and "pick-up" traffic windows in the morning and afternoon. These peak periods will directly conflict with daily commuter traffic and local school runs. The addition of tight turning movements and increased vehicle queues near the intersection will create an unacceptable traffic bottleneck and heighten the risk of vehicular accidents.

3. Inappropriate Ingress/Egress and Pedestrian Safety

The proposed access points for the Child Care Centre do not safely accommodate the volume of vehicles expected for a commercial facility of this nature. Cawdor Road lacks the necessary auxiliary lanes (such as dedicated right-turn pockets) to safely manage stopping traffic. Furthermore, the high volume of children and parents navigating the site on foot poses a significant safety hazard, given the current lack of continuous, protective pedestrian infrastructure linking this specific site to the broader Highfields pedestrian network.

4. Conflict with Local Character, Amenity, and Visual Impact of Car Parking

Highfields is traditionally valued for its spacious, low-density residential amenity, large street trees, and semi-rural peace. Introducing an intense, commercial-scale child care facility into a predominantly residential pocket undermines the "Highfields, Meringandan and Meringandan West Local Plan Code," which emphasizes orderly growth that preserves local residential integrity.

- **Visual Amenity of the Car Park:** The large expanses of asphalt and high-turnover parking associated with this commercial development are completely out of character with the Cawdor Road streetscape. To maintain any semblance of local character, the car park must be completely hidden from view from

Cawdor Road using dense, deep-ground structural landscaping, acoustic mounding, or architectural screening. An exposed commercial car park directly degrades the visual amenity of this primary corridor.

- **Acoustic Disturbance:** The associated noise from outdoor play areas, mechanical plant systems (such as commercial air conditioning), and frequent delivery vehicles will create an intrusive acoustic footprint that directly diminishes the lifestyle quality of adjoining neighbours.

5. Severe Boundary Impacts and Effluent Management Concerns for Adjoining Property

As the owner of the directly adjoining property, the design and layout of the facility have an immediate, negative impact on my boundary. I hold significant concerns regarding the placement and management of the proposed on-site effluent disposal area. To mitigate airborne odours, prevent potential subsurface wastewater migration, and protect my immediate visual amenity, Council must mandate that the effluent area be densely planted with advanced, water-tolerant native vegetation. A bare or poorly landscaped effluent field next to my boundary is entirely unacceptable. This vegetation must serve as a thick, structural buffer zone to shield my property from the visual, environmental, and physical realities of a commercial-scale wastewater disposal system.

6. Light Pollution and Intrusive Night-Sky Glow Affecting Adjoining Amenity

The commercial nature of the childcare centre introduces an unacceptable level of artificial light at night (ALAN) into an area prized for its dark, semi-rural evening amenity. The proposed outdoor security illumination, building-mounted floodlights, and illuminated commercial signage will cause severe, unmitigated light spill directly onto my adjoining property boundary.

- **Violation of AS/NZS 4282 Standards:** I hold grave concerns that the proposed lighting design will breach the strict limits for pre-curfew and post-curfew light spill set out in *AS/NZS 4282 (Control of the obtrusive effects of outdoor lighting)*, directly impacting the sleep quality and residential comfort of my household.
- **Ecological and Wildlife Disruption:** Highfields is home to native nocturnal fauna, including owls, possums and bandicoots. The introduction of unshielded, high-intensity, or blue-white outdoor LED fixtures will disrupt local wildlife foraging corridors and create artificial skyglow that interferes with these vulnerable species.
- **Requirement for Strict Directives:** To safeguard the immediate residential zone, Council must require a comprehensive, independent lighting impact assessment. Should this application proceed, strict conditions of approval must

mandate the use of fully shielded, downward-facing "warm-spectrum" fixtures (under 3000K), the complete prohibition of illuminated pylon signage after standard operational hours, and an absolute curfew on non-essential external lighting past 6:30 PM.

7. Long-Term Commercial Encroachment and Restriction of the Newly Created Lot

This application seeks a Reconfiguring a Lot (RAL) approval to split 1A Cawdor Road into two separate parcels. While one parcel is explicitly designated for the commercial Child Care Centre, the secondary newly created lot represents a significant risk for unmitigated commercial sprawl. I object to any outcome where this second lot is left open to future commercial development, overflow parking, or childcare expansions. To protect the surrounding residential fabric, Council must impose a strict condition of approval ensuring that the newly created vacant lot is explicitly restricted to low-density residential use only. It must not be utilized for any commercial purposes or ancillary activities associated with the childcare centre.

8. Insufficient Infrastructure Capacity and Stormwater Management

The localized civil infrastructure is already under immense pressure from surrounding developments. I hold significant concerns regarding the site's capacity to manage increased stormwater runoff. Forcing a commercial footprint and a dual-lot reconfiguration onto 1A Cawdor Road reduces permeable land. Without an exhaustive, independent stormwater assessment, this development risks exacerbating overland flow and localized flooding onto adjacent properties during heavy downpours on the high ridge.

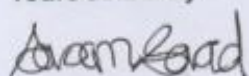
Conclusion

The proposed development represents an over-development of the site that introduces commercial-level traffic, environmental hazards, and noise impacts into an area ill-equipped to absorb them. As an immediate neighbour, the negative impacts on my property's safety, boundary privacy, health risk exposure, and residential character significantly outweigh the commercial utility of the project.

I urge the Toowoomba Regional Council to uphold the integrity of our local planning scheme and refuse application RAL/2025/5338. I request that Council keep me informed of any public hearings, reporting periods, or final determinations regarding this application.

Thank you for considering this submission.

Yours sincerely



Susan Saad