

Response to Submission Items

RTI RELEASE - DSDIP



Our Ref: 7230140
DSDILGP Ref: MID-0524-0845

19th September 2024

Department of State Development, Infrastructure,
Local Government and Planning
PO Box 15009 City East
Brisbane Qld 4002

Attn: Sean McCawley and Merisa Menin

Via email: sean.mccawley@dasilgp.qld.gov.au
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Dear Paul and Ian,

Re: 1-11 Princess Street Newtown Social or Affordable Housing MID- Response to Submissions

On behalf of Newtown QLD Pty Ltd, we provide below a summary of key items raised within submissions received during the statutory consultation and responses demonstrating how the feedback has been considered. The responses are presented in two tables, the first summarising public and community stakeholder comments, and the second providing direct responses to comments received from Toowoomba Regional Council.

Overall, 115 submissions were received as of the closing date on 16 September 2024, however one submission was a repeat, therefore the total properly made submissions is 114, comprising the following:

Support:	29
Oppose:	82
Neutral:	4
Total:	115

As detailed in our application and this response to submissions, the approval of this development will assist in meeting a significant need identified for affordable and social housing within the Toowoomba Region. It will provide much needed accommodation to support the influx of key workers that will arrive to service the new Toowoomba Hospital, the new Boeing office and other new employment generating business earmarked for the region. In addition, it will service the likes of schoolteachers and emergency services workers struggling to find rental accommodation that is affordable.

The community housing will assist in housing person such as over 55 women who have been victims of domestic violence and who aren't financially independent.

This proposal presents a high-quality development with accommodation commensurate with build to sell product that will provide a positive contribution both from a visual perspective and to the social fabric of the community. All of this will be owned and operated by provided Mission Australia Housing (MAH) who have extensive national experience and are a tier one community housing provider.

Ethos Urban has gone above and beyond with its community consultation processes. Council and its elected members are highly supportive of the project and has demonstrated during the statutory consultation process, the level of support is also considerable and reflects that the community perception of these forms of development have turned into a more positive response.

We look forward to receiving the Minister's approval and should you have any questions, please do not hesitate to contact Sch. 4(4)(6) - Disclosing personal information

Yours sincerely,

Sch. 4(4)(6) - Disclosing personal information



Director, Planning

Sch. 4(4)(6) - Disclosing personal information@ethosurban.com

Ethos Urban

RTI RELEASE - DSDIP

1.0 Response to Community Submissions

Item	Issue	Response
1) Support		
a) Various	<ul style="list-style-type: none"> The construction of this development by McNab would support local employment, subsequently boosting local economy. McNab will deliver the proposed development at a high quality. Appropriate infrastructure such as Clifford Gardens Shopping Centre in vicinity of development to support density. Proposed land use, building height and form is consistent with the Toowoomba Regional Planning Scheme. Current shortage of affordable housing developments area. This development would assist in amending that and support struggling individuals and families. Development would cater for housing demand of key workers, predicted to increase with development of the Toowoomba Hospital. Management of the housing by respected organisation, MA, alleviates concern of apparent behaviour and perceived risk of residents on the local community. Developments of similar style and/or purpose are likely to become more common in the area. Car parking is appropriate given low car ownership rates of those expected to occupy housing. This can also be managed by MA. MA will be operating a minibus for resident use and provide two dedicated pool EVs Development is respectful of surrounding structures and would act as an enhancement to the neighbourhood, providing jobs and opportunities to local businesses. 	<p>The approval of this development will assist in meeting a significant need identified for affordable and social housing within the Toowoomba Region. It will provide much needed accommodation to support the influx of key workers that will arrive to service the new Toowoomba Hospital, the new Boeing office and other new employment generating business earmarked for the region. In addition, it will service the likes of schoolteachers and emergency services workers struggling to find rental accommodation that is affordable.</p> <p>The community housing will assist in housing person such as over 55 women who have been victims of domestic violence and who aren't financially independent.</p> <p>This proposal presents a high-quality development with accommodation commensurate with build to sell product that will provide a positive contribution both from a visual perspective and to the social fabric of the community. All of this will be owned and operated by provided Mission Australia Housing (MAH) who have extensive national experience and are a tier one community housing provider.</p> <p>Ethos Urban has gone above and beyond with its community consultation processes. Council and its elected members are highly supportive of the project and has demonstrated during the statutory consultation process, the level of support is also considerable and reflects that the community perception of these forms of development have turned into a more positive response.</p>
Lack of demand		
b) Demand for social housing.	<p>There is not demand for social and affordable housing in this area as there are other social housing proposals currently planned for or operating in Toowoomba. The social housing developments should be more evenly distributed throughout Toowoomba.</p> <p>The proposed development does not deliver the housing mix required by people awaiting accommodation.</p>	<p>There is a demonstrated need for additional community and affordable housing within Toowoomba, which will require significant investment to alleviate.</p> <p>As of December 2023, there were 1,443 applications who reside in or around Toowoomba were listed on the public housing wait list. This includes 692 applicants requiring a 1-bedroom apartment, 305 applicants requiring a 2 bedroom apartment,</p>

		<p>306 applicants requiring a 3 bedroom apartment and 140 applicants requiring a 4+bedroom apartment.</p> <p>The proposal will provide 96 affordable housing units, and 89 community living units. Residents of the community living units will be selected from the public housing waitlist, providing for only a small proportion of the demonstrated need.</p> <p>It is concluded that there is demonstrated there is a significant need and demand for this form of housing within this locality.</p>
2) Traffic and Carparking		
<p>a) Number of Carparking spaces</p>	<p>The proposal provides car parking at a rate of 0.7 spaces per apartment. This is considered insufficient and non-complaint with the planning scheme rate which would require 321 car parking spaces. The surrounding streets are already busy with on street parking, and the reduced parking rate will increase the demand for on street parking.</p> <p>It is requested that the proposal apply the State Governments recommended rate for social housing developments, requiring 1 space per unit.</p> <p>Due to Toowoomba's regional location, it is anticipated that residential, especially those within the affordable housing portion of the development, would be more reliant on private vehicles.</p> <p>The 11 visitor spaces appear to be included in the car parking calculation of 128 spaces. It is unclear whether the 11 visitor spaces will be enough to accommodate carers and allied health professionals.</p> <p>There is also no dedicated emergency vehicle space, or taxi pick up / drop off area within the proposal area.</p>	<p>The proposed on-site car parking provision equates to approximately 0.7 spaces per unit, which aligns with the Australian Bureau of Statistics (ABS) census data for households living in affordable housing in the Toowoomba Local Government Area (LGA). The census data determines that the average car ownership rate per dwelling for community and affordable development in Toowoomba is much lower than for a typical multiple dwelling residential use development. Furthermore, the proposed parking rate (or lower) has been approved for similar developments throughout Australia, including Toowoomba.</p> <p>Cycling facilities will be provided as part of the development, with a total of 59 secure bicycle parking spaces supporting cycling as a viable alternative to private motor vehicle use. Moreover, a minibus and two (2) electric vehicle pool cars will be donated to and managed by MAH to facilitate the movement of future occupants on the site who require transport.</p> <p>The visitor spaces will be available for carers and allied health professions, as visitors to the site. The eleven (11) spaces provided is adequate for these purposes.</p> <p>There is no requirement to provide a taxi pick up/drop off area, or emergency vehicle bays, however the vehicular access lane through the site will allow for emergency vehicles to set down off the street. The visitor parking bays located outside the security entry gate will also allow for taxis to pick up and drop off customers.</p> <p>It should also be noted that the site is adjacent to an existing shopping centre that provides a wide range of services and facilities that can be access by a very short walk from the site and, therefore, circumventing the need for cars.</p>
<p>b) Loss of car parking</p>	<p>The subject site is often used as overflow parking for by shopping centre staff, students of the Glennie School and larger vehicles. The removal of the staff car parking area will increase parking demand for the area and push staff parking on to residential streets.</p>	<p>The site is currently used to accommodate parking overflow, primarily from staff of the Clifford Gardens shopping centre. The owners of Clifford Gardens Shopping Centre recently obtained approval (MCUC/2022/2323/D) from Toowoomba Regional Council ('Council') to remove reliance upon this site for the purposes of car parking by the overarching plan of development for the shopping centre and several other planning permits i.e., the site is now exercised and free from any relationship to land comprising the shopping centre.</p> <p>It has therefore been demonstrated via Councils approval of MCUC/2022/2323/D that there is no longer the demand necessary to retain the site as an overflow parking area.</p>

		<p>Observations of the existing car park on numerous occasions has demonstrated that it is not readily used with circa less than 20% of the spaces occupied throughout the day. The primary users of the car park are those going to the adjoining gym or as The Glennie School pointed out in their submission by their students. We would submit that the loss of this car park will therefore have negligible impact on servicing the car parking demand in this locality.</p>
c) Impact on existing road network	<p>There will be an increased demand on the surrounding road network, which is already busy due to the nearby school and shopping centre. The anticipated traffic generation of this proposal would benefit from access via a Collector or Distributer Road or higher.</p> <p>Access is currently provided off Vacy Street within the school zone, which will further impact school traffic. The increased congestion will result in poor amenity for the residents and increased wear and tear on the network.</p>	<p>The Traffic Impact Assessment (TIA) supporting the application (appendix F of the MID submission) has demonstrated that this proposal will have no adverse impacts on the local traffic network. The TIA has provided some recommendations with respect to the provision of some signage prohibiting right turns onto Anzac Avenue that will be implemented.</p> <p>The proposed development is expected to generate 94 trips during the morning and evening peak hours with vehicle movements evenly split between access points on Vacy Street and Princess Street.</p> <p>The additional development generated traffic will result in a 6.8% increase in average delay compared to pre-development traffic at the Anzac Avenue / Vacy Street / Lendrum Street, James Street / Westray Street and James Street / Mirle Street intersections. This increase has been determined as marginal and therefore acceptable.</p> <p>It should also be noted that an on-site analysis of the locality at school pick up and drop off time found that traffic associated with this time was negligible in Princess Street with the bulk of traffic being on the other side of the school in Herries Street.</p>
d) Traffic and pedestrian safety	<p>The traffic congestion will lead to an increase in the risk of traffic accidents. There will be a higher number of pedestrians and this will lead to overcrowding of the pedestrian pathways.</p> <p>There is no provision of a pedestrian route from the development to Clifford Gardens from Princess St. Street trees and pedestrian footpaths should be provided on all frontages to ensure pedestrian safety and encourage active transport.</p>	<p>The application is supported by a Traffic Impact Assessment (TIA), which has assessed the likelihood and consequence of safety risks being increased due to the additional use of the road network. This assessment found that the addition of development generated traffic is not expected to have a significant adverse impact on the safety of the state-controlled road network.</p> <p>The proposal includes pedestrian access points from the Vacy Street, Mirle Street and Princess Street frontages, which will provide safe pedestrian connections to the existing pedestrian footpath network. Furthermore, the TIA has recommended that a pedestrian footpath be provided within the Princess Street verge (subject to an assessment of the impact on the existing street trees). This footpath should connect with the existing footpath on Mirle Street to the east. The development proposes to deliver this requirement.</p> <p>The proposal has been reviewed by Councils traffic engineers for suitability, and a response is provided in the following Table 2.0.</p>
e) Lack of public transport network	<p>The site is not within proximity to sufficient public transport networks to support the residents who do not own vehicles. The pedestrian environmental from the proposal site to the nearest bus stop is unsafe.</p>	<p>The proposal is within 500m walk distance of existing bus services that run to and from the Clifford Gardens Shopping Centre. Notwithstanding this, additional transport options will be provided by MAH including a shuttle service via the dedicated minibus and two (2) EV pool cars.</p>

		Additionally, the site has been selected due to its proximity to the existing range of goods and services provided by the Clifford Gardens Shopping Centre.
f) Access arrangements	The entrance to the proposal from Vacy street should be removed or relocated to Mirle Street. The current entry point is too close to the school.	<p>The entry/exit on Vacey Street does not impact on the school's secondary access used primarily for staff parking with their main access point for pick up/drop offs being on the other side of the school in Herries Street.</p> <p>The site currently used as part of the Shopping Centre carpark and provides an exit/entry onto Vacay Street and thus the proposal does not change the status quo. The proposal will provide two entry/exit options with the other being on Princess Street and, therefore, allows for the distribution of trips two and from the site rather than a concentration on one of the adjacent access roads.</p>
Engineering and Services		
g) Impact on existing infrastructure	The proposal will unduly increase demand on resources such as roads and utilities and sewage infrastructure. The Serviceability Report does not adequately consider peak demand on the existing infrastructure and the downstream impacts. It is also noted that Councils infrastructure planning would not have anticipated development of this scale within the Major Centre Zone and therefore is inadequately prepared.	<p>A preliminary serviceability report has been included as part of the submission, which demonstrates that the existing infrastructure network is sufficient to support the proposal.</p> <p>Newtown QLD Pty Ltd will also be entering into an Infrastructure Agreement with Toowoomba Regional Council to provide appropriate contributions.</p>
3) Building Design		
a) Building Height	There are no other buildings within the immediate area that are 5-6 storeys, therefore the proposal will look out of place and will overshadow nearby properties. The proposed development's size, scale, and density do not align with the established character of the neighbourhood. The building height does not provide an adequate transition from the centre uses to the surrounding residential and character areas. The building height should be reduced to 2-3 storeys to better reflect the neighbourhood character.	<p>The current built form proposed has already been revised from nine (9) storeys that was presented in the initial stakeholder consultation. This was then reduced in the MID endorsed concept down to maximum of eight (8) storeys.</p> <p>The proposal, which now comprises 4 building footprints has a maximum height ranging from 5-6 storeys. This height is now more consistent with development anticipated within the site's Major Centre zone under the Toowoomba Regional Planning Scheme (TPS), which allows for buildings of up to 6 storeys in height.</p> <p>Furthermore, the proposal has been designed to provide a transition in building height by stepping down to 5 storeys on Princess St to provide appropriate relationship to the lower density residential areas to the south and east. It should be noted that the TPS permits development of up to three (3) storeys for surrounding development in the Urban Consolidation Precinct. It has therefore been concluded that the proposed building height is not in conflict with the intended outcomes for the locality.</p> <p>With respect to overshadowing, the solar access analysis submitted with the application demonstrates that only the front yards of some of the existing dwellings on Mirle Street would be impacted upon during the Winter Solstice by the proposal. At this time the primary internal and external living areas will not be impacted by shadow cast by the proposal. At all other times of the year no other existing adjacent residential property will incur any shadowing impact by the proposal</p>

		<p>Additionally, the submitted Heritage Impact Assessment report concluded that the development is within acceptable outcomes in relation to building height within planning scheme for this location.</p>
b) Building Design	<p>The current proposal conflicts with the Q-Design principles, specifically Principle 2: <i>Be inspired by local place, character, form and culture – Memorable places, places with their own identity, reflect the distinctive qualities of their physical setting, heritage and community values.</i></p>	<p>The proposal reflects the intended physical setting for its centre location in terms of building height and overall appearance. It also supports a sustainable population density in a well serviced location and encourages housing diversity in the locality consistent with Q-Design Principle 6: Deliver Diverse Development Forms and Density.</p> <p>The overall design of the proposal is of a high quality and will use a material palette in keeping with the surrounding area. The use of materials such as face brickwork, lightweight cladding and cedar imitation cladding reflect the materials seen in nearby properties, creating a cohesive design palette. In essence, the building will provide a positive contribution to the existing urban fabric in this locality.</p> <p>Wide street setbacks ranging from 4m to 6m are provided at ground level allowing for generous deep soil landscaping around the perimeter of the site. Up to 6m setbacks are provided at upper levels maximising the separation distance between adjacent buildings.</p> <p>The design of the building will also provide generous sized units will high level of internal amenity commensurate with a typical build to sell product. There will be no difference in the quality that will be provided between the affordable and community housing accommodation.</p>
c) Density of development	<p>The number of dwellings proposed is inappropriate for the size of the site. The overall density proposed is too high for this location and does not reflect gentle density, as described in the SEQ Regional Plan.</p> <p>The proposal equates to 280 dwellings per hectare, which exceeds the anticipated density of the Major Centre Zone. Furthermore, the plot ratios is 3.1, where a plot ratio of 2.0 is anticipated.</p>	<p>The Major Centre zone code in the TPS requires residential developments to achieve a minimum density of 40 dwellings per hectare or greater. It is acknowledged that the proposal exceeds the minimum density requirement as it seeks to respond to the need and demand for increased supply of affordable and community housing in the locality. The development is at an appropriate intensity and density that supports the strategic role and function of the Clifford Gardens shopping centre.</p> <p>The development is broken up into four (4) buildings that aids in reducing the proposed building scale and mass. Each building has a footprint of approx. 850m² – 935m² which is significantly smaller than the adjacent gym and many of the buildings within The Glennie School.</p>
d) Impacts on heritage assets	<p>The proposal will impact on the historical character of the suburbs and surrounding heritage and character residential areas. The bulk and scale of the development, together with the sites proximity to The Glennie School has the potential to adversely impact the heritage value of the existing asset. The proposal will detract from views to and from the Local Heritage Place. The Heritage Impact Statement submitted with the MID application has not considered the impact of the development on the neighbourhood character values of the surrounding streetscape. It is also proposed that the Heritage Statement is not valid as it refers to seeking support from Council, not the State.</p>	<p>A heritage impact assessment has been undertaken for the proposal, which assesses the potential impact on the cultural heritage significance of the nearby local heritage place, The Glennie School. The proposal has been assessed against the relevany local planning scheme policies and states that it can be supported with no design changes necessary.</p> <p>This assessment concludes also that the proposal adheres to the relevant performance outcomes of the TPS and demonstrates a commitment to preserving the cultural heritage significance of the Glennie School. The materials palette proposed for the building façade contributes to the design cohesion of the proposal and the existing hertiage place.</p> <p>The proposal also has had regard for the site context, ensuring that amenities such as parking facilities and communal areas are appropriately placed and screened.</p>

		<p>It is noted that the school is orientated to the north and as such, development on the opposite side of Vacy Street, will not be visible from Harries Street. This ensures that the proposal does not adversely impact the historical entrance to the school.</p> <p>Overall, the heritage impact assessment of the proposal is found to not compromise the cultural heritage significance of The Glennie School.</p>
e) Provision of communal open space	<p>The proposed open space within the site is not sufficient for the number of residents. There is an insufficient provision of recreational space for children, with no proposal for play areas.</p>	<p>Centralised landscaped communal open space areas at podium level are proposed, which are suitably sized and located to enhance the amenity of residents and encourage social interaction and wellbeing. A ground level communal landscaped garden is also proposed which extends from an internal communal open space area.</p> <p>The podium level space is proposed to include a mix of recreational opportunities, such as a vegie garden, seating, table tennis and 2 x BBQ areas. The total communal space area equates to 15% of the site area, which is appropriate for the scale of the development.</p>
f) Location of Transformer substation	<p>There is a main transformer station proposed opposite residential dwellings. This should be relocated to the opposite side where the adjoining property is currently an industrial development.</p>	<p>Location of the pad mounted transformer has been informed by the existing services, which restricts it being able to be relocated. Furthermore, these are standard pieces of infrastructure that do not emit any nuisance noise.</p>
g) Overshadowing	<p>The submission material only demonstrates the shadowing of the proposal at two times of the day. A wider range should be shown.</p>	<p>The solar access diagrams provided demonstrate the shadows at the most impactful time of the year being the Winter Solstice at 3pm. As previously noted, the front yards of some existing dwellings on Mirle Street would be impacted in the Winter Solstice, however their primary internal and external living areas remaining unaffected at this time or at any other times during the day.</p>
h) Balcony design	<p>The balconies on the northern side of the northern towers that face Vacy street are too large, and should be reduced in size. This should in turn reduce potential noise impacts. Additionally, balconies should have fixed screening to reduce overlooking.</p>	<p>Whilst some of the balconies on Vacy Street are larger in total area, this is in part due to the wrap around feature. The additional space along the window is not large enough to be considered usable space.</p> <p>All the balconies proposed along all street façades include solid balustrading, with some featuring additional batten balustrade above the blockwork.</p>
i) Landscaping	<p>It is proposed that podium level landscaping, including deep planting, be provided along Vacy street to further screen the proposal from the surrounding area.</p>	<p>The Vacy Street frontage will include on average 4m wide setback for deep soil planting at the ground floor, along with additional planting on the upper levels of the façade, as per the Landscape Plan.</p>
4) Conflicts with the Planning Scheme		
a) Non-compliances with zone requirements	<p>The proposal conflicts with the zone requirements of the site. The zone code requires street activation and a mix of uses, which is not being delivered as part of the proposal.</p> <p>The conflicts with the planning scheme, (including building scale, response to the zone requirements and residential density etc.) amount to the development not meeting reasonable community expectations of the scale of development in this area.</p>	<p>We understand that with respect to MID proposals, whilst regard for the relevant planning scheme is necessary it is not mandatory to strictly comply with its Acceptable Outcomes. The proposal is focussed on the delivery of critically important infrastructure and strict compliance would make it unfeasible to deliver and meet the demand for affordable and community housing.</p>

	Approving something that doesn't align with the planning scheme will set a precedent for future similar development.	Council has been a key stakeholder throughout this process and have also assessed how the proposal responds to the planning scheme. Council have agreed that the land use is consistent with Council intent expressed in the Strategic Framework of the TPS and that the development intensity is generally consistent with Councils intent as expressed in the Purpose and Overall Outcomes of the Major Centre Zone Code in the TPS.
5) Location		
a) Proximity to Glennie School	<p>The proposal will result in overlooking of the existing Glennie Boarding School. There are concerns that this will result in an unreasonable intrusion on the privacy of the students and create an unsafe environment for young women. It is anticipated that the school will lose enrolments if the proposal goes ahead.</p> <p>If the development does go ahead, it has been recommended that either windows be removed from the Vacy street façade, or that the full height windows be either decreased in size, or glazed to obscure the glass.</p>	<p>The building will be setback from the site's Vacy St frontage 6m from levels 1 and above. The proposal is also separated and/or located circa 50m from the nearest boarding house on The Glennie School grounds. This separation in itself is more than adequate to mitigate potential adverse visual and aural privacy impacts from the proposal on The Glennie School.</p> <p>The building façade has been designed to minimise overlooking and potential impacts on privacy through the incorporation of fixed vertical blade screens and solid balustrading for each of the balconies.</p> <p>Moreover, deep soil landscape screening proposed along the Vacyt Street frontage will also assist in providing privacy screening to the lower 3 levels of the building.</p>
b) Proximity to services and facilities	The development will add strain on the existing community facilities such as schools, medical services and public open spaces. The proposal will require additional health and welfare support services, at a scale greater than what is currently provided within the locality.	<p>The location for the proposal has been chosen in part due to its proximity to existing services and facilities. Proximity to the Clifford Gardens shopping centre will provide residents easy access to core facilities such as groceries, banking facilities and medical services.</p> <p>The site is also within walking distance to two parks (Laurel Bank Park and O'Quinn Street North Park). The site is also within the catchment of Newtown State School (1.3km away) and is within walking distance to nearby childcare centres.</p>
c) Alternative locations	There are other locations within Toowoomba that would be better suited for this development. It is proposed that the development would be better suited out of the city area where there will be more green space and a better environment.	The site was chosen due to its proximity to existing services, such as medical and health facilities and shops, and due to its appropriate land use zoning. It is not a requirement of the planning process to undertake a site selection process therefore the appropriateness of other locations cannot be a determining factor in decision making.
d) Removal of developable area in centre use.	The proposal results in a reduction of land that would otherwise be available for centre uses, which is in conflict with community expectations for the growth of commercial development in the area. Additionally, it is suggested that approved change application MCUC/2022/2323/D demonstrates that the proposal subject site is the only land available for future development in this zone.	The proposal presents a land use compatible with that anticipated in the Major Centre Zone, therefore, the dwellings and small offices space is not in conflict with community expectations. The approval of MCUC/2022/2323/D demonstrate that the land is no longer required for retail uses or uses supplementary to the existing Clifford Gardens Shopping centre.

e) Impacts on property values	Current residents property values will decrease as a result of the development. It is considered that the introduction of social and affordable housing will alter the perception of the neighbourhoods.	Land value is not a matter for consideration within the relevant planning framework. Notwithstanding this, it is submitted that proposal will provide a positive contribution to the area in terms of a new modern built form and integration of persons who need assistance into a well-established and serviced community.
6) Construction Impacts		
a) Amenity impacts during construction	This development is intended to take a minimum of 2 years to build and complete. This will result in a loss of amenity for residents due to increased noise, traffic and dust. This will have health implications for surrounding residents.	A Construction Management Plan will be developed by the project builder as part of the Building Application stage. This will demonstrate how construction can be managed with minimal impact on the surrounding residents and will provide mitigation measures for potential impacts that cannot be avoided.
b) Parking	There is nowhere for construction workers to park during the construction period of two years and this will further increase the parking issues in the area.	A Construction Management Plan will be developed by project builder as part of the Building Application stage. This will demonstrate how construction can be managed with minimal impact on the surrounding residents and will provide mitigation measures for potential impacts that cannot be avoided.
7) Social Impacts		
a) Anti-social behaviour and crime	The introduction of higher density dwellings and social / affordable housing will lead to an increase in anti-social behaviour and result in higher levels of crime. There will be an increase in noise disturbances, vandalism, littering and loitering. There should be effective management in place to address this. This will also increase the demand of police in the area.	MAH is a top tier community and affordable housing provider, who operate a number of successful developments throughout Queensland and nationally. Their aim is to support people to access and sustain a safe and stable home, enable them to improve their wellbeing and live a healthy and vibrant life so that they can achieve individual and community outcomes Their experience in operating similar developments ensures they will responsible operators and hold residents to a high standard. MAH offer an integrated model of housing and support, with community service teams on hand to assist tenants throughout their tenancies. MAH provide options for tenants to connect with educational opportunities, training and employment services and other support programs to that improve independence. MAH is committed to ensuring tenant and community safety and have numerous programs and safeguards in place to ensure the adverse impacts that concerns the community will not be realised. MAH will also have an onsite management office during business hours and an after-hours call service to deal with complaints or tenant and/or building associated issues.
b) Impacts surrounding residents	The proposal will bring a large number of new residents into the neighbourhood and there is concern that this will disrupt the social fabric of the existing community.	As noted above, MAH is highly experienced and well-resourced, with a range of management policies and supports in place for its future tenants.
c) On site security	An on-site, line in manager should be provided, along with on site security to manage potential crime and protect residents.	MAH will have on-site manager deployed at the premises during business hours as well as an after-hours call centre/contact provided to future residents and those who reside within proximity to the site.
8) Approval Pathway		

d) Lack of community consultation	There has not been a sufficient amount of community consultation to support the application.	Ethos Urban on behalf of the applicant has gone above and beyond in terms of the non-statutory consultation with stakeholders. Prior to lodging the MID, the Applicant undertook extensive early engagement with a range of stakeholders including local residents, The Glennie School, elected officials, indigenous groups, DHLGPPW and Council. Consultation has included numerous face to face meeting, 3 x webinars, letters and a presentation to both the elected Council members and the Council planning team.
e) Use of MID pathway	The proposal is being considered via the MID pathway as a way of avoiding having to comply with planning scheme policies.	MIDs facilitate the delivery of certain community supporting infrastructure, including community housing. The MID process provides an alternative to lodging a development application with the relevant local government and is managed by the department with input from other government agencies. It is not the intent of this application to avoid consideration against the planning scheme. The MID application has included an assessment of the proposal against the relevant planning scheme, demonstrating compliance and identifying the areas of non-compliance.
f) Consideration of a State Interest	It is proposed that this social and affordable development does not automatically qualify for consideration as a State Interest under the Planning Regulation.	Upon declaration of the proposal as an MID, it was confirmed that it qualifies as a State Interest and is therefore appropriate for the MID pathway to be utilised.
g) Contractor employment	The contractor for the development is already engage, this should not be permitted prior to the approval of the application.	Engagement of the project building prior to the approval of the application has been necessary to ensure that it is 'shovel ready' and be able to be delivered in a timely manner to meet the need for the infrastructure.
Amenity		
h) Increased noise and air pollution	The proposal will result in increased road traffic, along with increased noise levels due to the number of residents. Higher numbers of cars on the road will lead to higher levels of air pollution.	As demonstrated within the TIA there will only be a minor increase in the level of traffic using the local road network. The benefit of providing this housing density in this location is that it is easily accessible by foot to a range of services and facilities provided by the Clifford Gardens shopping centre.
i) Overlooking	Due to the height of the building and its proximity to existing residential dwellings and the Glennie Boarding School, the proposal will result in a loss of privacy for existing residents.	The relevant amenity acceptable performance outcomes of the TPS have been addressed in the application, to ensure that a high level of amenity is achieved, and that the development contributes positively to the streetscape and public domain. This includes managing the interface with adjoining residential uses to mitigate amenity impacts including protecting visual privacy through appropriate design responses including, for example, building separation and privacy screening.

2.0 Toowoomba City Council Response

Reference	Issue	Comment or Recommendation	Applicant Response
Planning			
<p>Environmental Assessment Report Section 5.5</p> <p>Submitted plans and reports</p>	<p>Broad inconsistency with Council's intent expressed in the TRPS.</p>	<p>The land use is consistent with Council's intent expressed in the Strategic Framework of the TRPS.</p> <p>The land use and development intensity are generally consistent with Council's intent as expressed in the Purpose and Overall Outcomes of the Low-medium Density Residential Zone Code Urban Consolidation Precinct of the TRPS.</p>	<p>Noted.</p>
<p>Environmental Assessment Report Section 5.5</p> <p>Submitted plans and reports</p>	<p>Specific consistency or inconsistency with Council's intent expressed in the TRPS.</p>	<p>Although the subject site is within the Major Centre Zone, it forms the edge of that zone. The site is adjacent to low density residential uses to the south and east (located within the Neighbourhood Character Overlay), and a school to the north ('The Glennie School') with a built form characterised by a sprawling campus of single and double storey buildings.</p> <p>As the proposal exceeds a plot ratio of 2.0, it is recommended that the buildings step in height, with the highest components away from the low-density edges. This will allow a height transition from the east and south, to the highest point of the proposal (6 storeys), respecting the scale and character of existing low-scale built form areas. This will assist in reducing the visual impact of the plot ratio, while still capturing the unique opportunities provided by the site's proximity to Clifford Gardens and access to public transport.</p> <p>Additional specific comments are provided below, where warranted.</p>	<p>The proposal has been amended since the original concept design stage, which has a building height of up to nine (9) storeys across only 75% of the total site. Recognising the context of the site and relationship with surrounding development the design was amended to include the whole site and bring it back into line with a built form anticipated within the TP i.e., 6 storeys.</p> <p>The building height now provides a transition of 6 storeys from Vacey Street down to 5 storeys at the interface with the lower order residential zone on the opposite side of Princess Street. The residential land within Princess Street we understand, if sites are amalgamated, can accommodate town houses in the order of 3 storeys under the TPS and thus the height of the proposal ultimately provides an appropriate transition.</p> <p>The density proposed being a plot ratio of 3:1 is based on two key factors being to meet the established demand within Toowoomba for affordable and community housing and to ensure that the development is ultimately feasible given the current high construction costs the industry is currently battling. Without this level of density, the development cannot be delivered economically.</p>

Reference	Issue	Comment or Recommendation	Applicant Response
Engineering & Infrastructure			
Traffic Impact Assessment Appendix F	Traffic Impact Assessment Section 3.4 describes the use of a rear-lift Refuse Collection Vehicle. Council's waste contractor only uses front and side lift vehicles	An amended TIA and site plan should demonstrate how a front lift RCV can enter and exit the site in a forward gear.	The project team met with Council offices on the 11 September 2024 to discuss what it intended to provide in its submission to the Minister. It was confirmed that use of the central access road that runs through the site will allow the RCV to enter and exit the site in forward gear and facilitate use of the front lift garbage truck used by Council.
Traffic Impact Assessment Appendix F Architectural Plans Appendix B	The TIA and site plan makes provisions for 128 car parking spaces, along with 59 bicycle parking spaces. Under the TRPS, the parking requirement is 322 car parking spaces.	An amended TIA and site plan should provide additional on-site car-parking spaces to limit the shortfall as much as possible. Council's preference is not less than 1 car parking space per unit.	As discussed in the meeting held with Council offices on the 11 September 2024, the proposed on-site car parking provision equates to approximately 0.7 spaces per unit which aligns with the Australian Bureau of Statistics (ABS) census data for households living in affordable housing in the Toowoomba Local Government Area (LGA). The census data determines that the average car ownership rate per dwelling for community and affordable development in Toowoomba is much lower than for a typical multiple dwelling residential use. Furthermore, the proposed parking rate has been approved for similar developments throughout Australia, including Toowoomba. Moreover, it is MAH's experience that the proposed car parking rate would be sufficient, based on similar operations run in other semi-rural localities. MAH also manage the tenant cohort based on level of car ownership to ensure it is generally commensurate with the on-site availability. As previously outlined the proposal will also include the use of a dedicated mini-bus and tenants will access to two (2) EV pool cars.
Traffic Impact Assessment Appendix F	The TIA proposes vehicular accesses to Vacy & Mirle Street, with an additional pedestrian footpath along Princess Street.	Council recommends that conditions of any approval include the requirement for an Operational Works application (to be submitted to Council) for the proposed vehicular access and footpath works.	Noted

Reference	Issue	Comment or Recommendation	Applicant Response
Serviceability Report Appendix I Section 3.4	A wastewater analysis report has not been provided demonstrating that Council's existing wastewater reticulation system is adequate to cater for the development.	<p>Council recommends that a wastewater analysis report, prepared in accordance with Council's <i>Wastewater Infrastructure Policy 2.04</i>, be provided which estimates the wastewater demand of the development, and the adequacy of Council's existing wastewater network including the downstream sewerage pump station.</p> <p>Where the existing wastewater network is not adequate to service the development, the report should identify augmentation works required. If augmentation is required, Council recommends the imposition of conditions requiring the augmentation work be completed.</p>	<p>A capacity assessment has been undertaken which has revealed that current wastewater infrastructure is adequate to service the proposal.</p> <p>Newtown QLD Pty Ltd are also entering into an Infrastructure Agreement with Council to ensure appropriate contributions are made toward any existing and future infrastructure needs.</p>
Serviceability Report Appendix I Section 3.5	A water analysis report has not been provided demonstrating that Council's existing water supply network is adequate to cater for the development.	<p>Council recommends that a water analysis report, prepared in accordance with Council's <i>Water Supply Infrastructure Policy 2.03</i>, be provided which estimates the water supply demand of the development and the adequacy of Council's existing water supply system to service the development. Water main sizes and modelling results should be provided for all stages of the proposal.</p> <p>Where the existing water supply network is not adequate, the report should identify any augmentation works required. If augmentation is required, Council recommends the imposition of conditions requiring the augmentation work be completed.</p>	<p>A capacity assessment has been undertaken which has revealed that current water infrastructure is adequate to service the proposal.</p> <p>Newtown QLD Pty Ltd are also entering into an Infrastructure Agreement with Council to ensure appropriate contributions are made toward any existing and future infrastructure needs.</p>
Architecture and Heritage			
Proposed Architectural Plans Appendix B	Too woomba's Major Centre Zone Code POS requires that development is oriented to the street with active uses provided such as shops, restaurants and cafes located at ground level; and incorporates footpaths, tree planting, lighting, seating and other	<p>Council recommends the imposition of conditions requiring the ground level car park has a minimum height of 3.5m to allow its conversion to an active use in the future.</p> <p>Note: The design shows a height of 3.5 metres at the corner of Vacy Street and Mirle Street. It is recommended this height extend for the full length of the building.</p>	<p>The car park will maintain a minimum height of 3.5m, with an open laneway running through the center of the site. Whilst there is some variation in ground floor height within the proposal, this will prevent future conversion of the development for alternate uses at this level.</p> <p>It should be noted that activation at the ground plane is provided to some degree via the MAH office proposed at the entry on Vacey Street. In addition, some units are</p>

Reference	Issue	Comment or Recommendation	Applicant Response
	<p>streetscape elements that enhance the quality of the pedestrian environment.</p> <p>The proposed Ground level is insular by design and has few active frontages.</p>		<p>proposed on the ground floor level on Princess Street.</p>
<p>Proposed Architectural Plans Appendix B</p>	<p>Toowoomba's Major Centre Zone Code PO14 requires building setbacks facilitate an attractive pedestrian environment at ground level which accommodates space for pedestrian circulation, social interaction and streetscaping and continuity of building lines that enhance the local character while, buffering to adjoining sensitive land uses where appropriate.</p> <p>The proposed screened car parks on the ground level doesn't promote activation.</p>	<p>Council recommends the imposition of conditions requiring the carpark to present an aesthetic facade to the public realm. For example: ground level carparking be screened to allow 40% visibility when viewed from street frontages and public places.</p>	<p>Ground floor activation will be achieved along some of the proposals facade through the following measures;</p> <ul style="list-style-type: none"> • Ground floor units sleeving the car park along the Princess Street frontage. • Pedestrian entry points and the communal room and garden along the Mirle Street frontage. • MAH office and lobby entrance along the Vacy St frontage. <p>Deep soil landscaping is also proposed to be incorporated to high degree along all of the site's street frontages that will soften any visual impact of the ground floor car parking.</p>
<p>Proposed Architectural Plans Appendix B</p>	<p>Toowoomba's Major Centre Zone Code PO19 requires a majority of car parking is provided at the rear of or under buildings.</p>	<p>Council requests that the Minister considers the option for car parking to be provided at the rear of, or under buildings rather than located on the ground level. This is to promote activation and to provide an aesthetic interface with the public realm.</p>	<p>Basement car parking was explored in early iterations of the concept design. The significant cost of constructing basement car parks however does not make the proposed development feasible unless there was a propensity to accept more building height and density on this site. It is submitted the proposal in its current form provides an acceptable balance between the built form anticipated in the planning scheme and delivering critical infrastructure.</p> <p>The car parking proposed will be well screened from all street frontages by the significant amount of deep soil landscaping provided along all the site's street frontages, an on-site office and units at the ground level on Princess Street. The screening used for the opening in the car park themselves will be integrated such they do not dominate the visual amenity of the surrounding streetscapes.</p>
<p>Proposed Architectural Plans Appendix B</p>	<p>Toowoomba's Medium Density Residential Code PO19 requires development incorporates typical domestic detailing to achieve a</p>	<p>Council recommends the imposition of conditions that achieves the screening of blank walls to minimise bulk through articulation and other measures, including the provision of the</p>	<p>The western facade includes a semi-open fire staircase that will provide articulation along with the proposed balconies. Other measures suggested by Council are incorporated into the building's facade such as:</p>

Reference	Issue	Comment or Recommendation	Applicant Response
	<p>residential scale living environment with aesthetic standards and amenity for occupants similar to those of single dwellings in the neighbourhood.</p> <p>It is noted that the proposed plans detail large unarticulated walls along the western elevation.</p>	<p>following:</p> <ul style="list-style-type: none"> • verandahs, porches, pergolas or balconies; • roof overhangs; • window hoods/screens; • awning and shade structures; • 600mm vertical gutter offset to create roof articulation; • climbing plants; or • different materials/textures/colours/mural. 	<ul style="list-style-type: none"> - window hoods/screens - awnings - mix of materials, textures and colours <p>Moreover, there is an existing building on the site to the west that will provide additional screening of the proposal. Any future redevelopment to the west of the site is unlikely to be orientated towards the site and therefore will potentially screen the entire western elevation of the proposal. Minimising openings in the west elevation has also been deliberate to protect from summer heat and winter westerly winds.</p>
Proposed Architectural Plans Appendix B	<p>Toowoomba's Transport, Access and Parking Code PO10 requires that set-down and pick-up facilities for bus, taxis or private vehicles are safe for pedestrians, cyclists and vehicles, conveniently connected to the main component of the development by pedestrian pathway; and designed to provide pedestrian priority and clear sightlines.</p> <p>The proposed development is to ensure that there are adequate sightlines between car park, mini-bus parking area and the office and the central open laneway.</p>	<p>Council recommends the imposition of conditions to provide for appropriate sight lines for the safety of pedestrians. For example:</p> <p>Sight lines at pedestrian and vehicle entrance points must be maintained using trees with a clean trunk to 1.8m height and shrubs to a maximum height of 0.75m.</p>	<p>Sight lines will be adequately maintained for both entrance points to ensure pedestrian safety. There are no trees proposed that will cause unnecessary safety risks.</p>
Proposed Architectural Plans Appendix B Landscape Concept Plan Appendix C	<p>Toowoomba's Transport, Access and Parking Code PO11 requires provision is made for the safe and convenient movement of pedestrians on site and external to the site, having regard to desire lines, legibility, weather protection and the needs of people with disabilities.</p> <p>The proposed open laneway is to include safe, priority pedestrian access through the lane to promote safe pedestrian</p>	<p>Council recommends the imposition of conditions to achieve visually attractive pedestrian treatments to promote activation and is aesthetic to the public realm. For example: Designates variation in pavement colours and/or materials to define safe pedestrian movement areas.</p>	<p>Noted.</p>

Reference	Issue	Comment or Recommendation	Applicant Response
	connectivity.		
Proposed Architectural Plans Appendix B	<p>Toowoomba's Major Centre Zone Code PO14 requires an attractive pedestrian environment at ground level which accommodates space for pedestrian circulation, social interaction and streetscaping, continuity of building lines that enhance the local character; and buffering to adjoining sensitive land uses where appropriate.</p> <p>Development in Clifford Gardens and parts of a building above two (2) storeys in height are set back a minimum of six (6) metres from the boundary alignment or the edge of the pedestrian pathway.</p>	<p>Council requests that the Minister considers increased setbacks to Mirle Street for those levels above 2 storeys, to create additional articulation and to reduce overshadowing of 3-4 dwelling houses on the east side of Mirle Street, particularly during the winter months.</p>	<p>The proposal will provide a setback of 6m from Mirle Street. This setback combined with the width of the carriageway of Mirle Street will provide significant and adequate spatial separation between the dwellings opposite this frontage. Deep soil landscaping will be provided to screen the proposal along the Mirle Street frontage along with high levels of articulation in the built form.</p> <p>As demonstrated in the accompanying shadow diagrams overshadowing of these properties is limited to a small amount within the front yards of some dwellings on Mirle Street during the Winter Solstice at and after 3pm. Subsequently, the proposal, the height and setback of the proposal results in negligible amenity impacts upon these existing dwellings.</p>
Proposed Architectural Plans Appendix B	<p><i>Queensland Government Social Housing Design Guideline QCompanion document, 2021</i> includes provisions for development to "Be a good neighbour, Make a good neighbour", including contributing positively to local character and making great streets.</p> <p>The TRPS Medium Density Residential Code has similar provisions to ensure development contributes to the positive qualities of the local streetscape and has a density appropriate for the site and local context.</p> <p>The proposal should include building materials that create lasting, quality accommodation and utilised to ensure the buildings age well and positively contribute to the area.</p>	<p>Council recommends the imposition of conditions to achieve a visually attractive built form to promote activation and is aesthetic to the public realm. For example:</p> <p>The final design is to incorporate a palette of materials that reflect typical materials and finishes of the local streetscape.</p>	<p>The overall design of the proposal is of a high quality and proposes a material and finishes palette in keeping with the surrounding area. The use of materials such as face brickwork, lightweight cladding and cedar imitation cladding reflect the materials observed in nearby properties, creating a cohesive design palette.</p>

Reference	Issue	Comment or Recommendation	Applicant Response
Heritage Impact Assessment Appendix E	Within this report there is a small diagram showing that from Herries St, the proposed building will not be visible behind the heritage building.	Council recommends that additional architectural plan/s are provided to confirm that the proposed building will not sit in the background affecting views from the front of the heritage school building/s.	<p>Pendergast Architects Heritage has undertaken a heritage impact assessment specifically determining the development's potential impact on the cultural heritage significance of the nearby local heritage place, The Glennie School. The proposal has been assessed against the relevant local planning scheme policies and states that the proposal should be supported.</p> <p>This assessment concludes that the proposal adheres to the relevant performance outcomes of the TPS and that the proposal demonstrates a commitment to preserving the cultural heritage significance of the Glennie School.</p>
Landscape			
Landscape Concept Plan Appendix C	Toowoomba's Medium Density Residential Code PO19 requires that the treatment of fencing reinforces the high quality, amenity and safety of the development. Fencing material has not been specified. It should be noted that solid walls at ground level creates 'dead' space.	Council recommends the imposition of conditions to achieve high-quality, visually attractive fencing. Fencing should consider active frontages, particularly the communal area at the corner of Princess Street and Mirle Street. Low height fences are recommended to promote clear sightlines into the building and garden area. The inclusion of creeper plants to grow over solid walls is recommended, to soften the walls and promote visual attraction and activation.	Fencing details are provided as part of the Landscaping Plans, showing the provision of a mix of timber screen fencing, aluminum panel fence and low screen fencing. Additional details can be provided at the building approval stage. Landscaping plans demonstrate the proposal's commitment to providing aesthetic boundary treatments.
Landscape Concept Plan Appendix C Proposed Architectural Plans Appendix B	Boulevard treatment to site frontages. The landscape setbacks at ground goes toward addressing PO16 of the Major Centre Zone Code which requires an open landscaped frontage with large trees deep planted in natural ground.	Council recommends increasing the setbacks along Princess Street to at least 6 metres to better facilitate deep planted landscaping, and improved presentation to the street.	Deep planting will be provided along the Princess Street frontage, within the western side of the frontage. Additionally, the ground floor affordable apartments will be set back 6m from the verge and will provide gardens for soft plantings. It should also be noted that all street trees along the Princess Street frontage will be maintained that will aid in screening the built form within the public domain.
Landscape Concept Plan Appendix C Proposed Architectural Plans Appendix B	While it is acknowledged that the site has been subdivided from the Clifford Gardens site, there is still an expectation that development in this area will address the requirements in the Major Centre Zone Code through active ground floor uses to site frontages.	Council recommends the carparking is relocated to be setback within the site or sleeved behind ground floor units to improve the presentation and activation to the street.	All opportunities to increase street activation have been explored throughout the design process of this proposal. It is submitted that the design of the proposal adequately balances the need for car parking with the objective of achieving street activation. The Princess Street frontage will comprise sleeving through the provision of an entry lobby, ground floor dwellings and communal shared space. The Vacey Street frontage will also consist of an office space and entry lobby.

Reference	Issue	Comment or Recommendation	Applicant Response
Landscape Concept Plan Appendix C Proposed Architectural Plans Appendix B	There is existing vegetation, particularly within the site frontages which is considered to be significant and worthy of retaining to address Landscaping Code PO3. Most of this vegetation is located within the proposed landscape setback which would enable retention.	Council recommends the retention of existing on-site vegetation where possible.	All vegetation on the proposal site that can be maintained will be. Any tree removal deemed necessary will be replaced where possible.
Landscape Concept Plan Appendix C Proposed Architectural Plans Appendix B	Central laneway pedestrian experience. It is suggested that the central laneway will likely be utilised for pedestrians traversing through the site.	Council recommends an improved design of the laneway to better address CPTED requirements by minimising opportunities for entrapment and explore increased landscaping outcomes at the ground plane.	It is proposed that the current design appropriately addressed CPTED requirements, and that further landscaping may restrict sight lines and increase safety concerns. There are multiple points of entry/exit from the laneway as a pedestrian, including internal stairwell access points they will be well lit.
Street Trees			
Proposed Architectural Plans Appendix B	Impact of development on existing Street Trees	Council requests the retention and protection of existing street trees during planning and works. To this end, the proponent should consult with Council to identify the appropriate management of the street trees.	Noted.
Landscape Concept Plan Appendix C		It is recommended to include a condition requiring the submission of an Arborist Report that demonstrates the proposal will not negatively impact on the street tree/s. The Arborist Report should include, but not be limited to the following: <ul style="list-style-type: none"> - Site address; - Tree location/s and context (e.g. ground conditions); - Inspection methodology (aerial inspection, visual tree assessment, other); - Tree dimensions (height, crown spread and trunk diameter); - Health and structural condition; - Estimated age and useful life expectancy; - Details of the construction activities and their likely impact; - Tree Retention value; - Cultural / heritage values; 	Noted.

Reference	Issue	Comment or Recommendation	Applicant Response
		<ul style="list-style-type: none"> - Tree protection measures to be applied; - Recommendations; and - Supporting evidence (pictures, test results and site plan). 	
Proposed Architectural Plans Appendix B Landscape Concept Plan Appendix C	Modification/removal of existing Street Trees	<p>Council requests the imposition of conditions to ensure any modification/removal of existing Street Trees is appropriately undertaken. For example:</p> <p>Obtain written approval from Toowoomba Regional Council Parks and Recreation Services Branch for removal of existing street trees prior to any site works. Where approval by Council is granted, all conditions of the written approval must be adhered to.</p>	Noted.
Proposed Architectural Plans Appendix B Landscape Concept Plan Appendix C	Replacement of Street Trees	<p>Council requests the imposition of conditions to ensure any replacement of Street Trees is appropriately undertaken. For example:</p> <p>Unless otherwise agreed by Council OR varied in an approved landscape plan (to increase the number and/or vary the location of street trees only), plant and maintain for a period of 18 months, street trees within the road reserve for every ten (10) metres of road frontage.</p> <p>The selection and planting of any street tree, including any street tree required to replace a removed street tree must be in accordance with the requirements of <i>Planning Scheme Policy No.8 - Street Trees</i>, the <i>Toowoomba Regional Council Street Tree Master Plan</i>.</p> <p>All landscape works must be established by a qualified person and maintained for the life of the development, and in a manner that ensures healthy, sustained and vigorous plant growth. All plant material must be allowed to grow to full form and be refurbished when its life expectancy is reached.</p>	Noted.
Environmental			
Waste Management Plan Appendix H	The Waste Management Plan generally meets Council's Technical Guidelines for New	Council requests that the Minister approve the Waste Management Plan report or include conditions that stipulate waste storage and	Noted.

Reference	Issue	Comment or Recommendation	Applicant Response
	<p>Developments Waste Storage and Collection Requirements.</p> <p>The waste generation rates, storage areas and collection point are acceptable for a front lift waste collection vehicle.</p>	<p>collection as per the submitted plans and for the volumes and collection rates included in the Waste Management Plan report.</p>	
<p>Acoustic Report Appendix K, Sections 7.1.1, 7.1.2 and 7.2</p>	<p>Impacts from the development on existing receptors was assessed using AQO limits, and background creep limits. Results showed compliance.</p> <p>Modelling indicates compliance subject to recommendations in Section 8.</p>	<p>Council requests that the Minister approve the Acoustic Report or include the recommendations in Section 8 of the Acoustic Report as conditions of approval.</p>	<p>Noted.</p>

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