

**From:** "No Reply" <mydas-notifications-prod2@qld.gov.au>  
**Sent:** Thu, 6 Feb 2025 15:45:01 +1000  
**To:** "Emma.Staines@braziermotti.com.au" <Emma.Staines@braziermotti.com.au>  
**Cc:** "bronwyn.bignoux@dsdilgp.qld.gov.au" <bronwyn.bignoux@dsdilgp.qld.gov.au>; "Development Assessment" <developmentassessment@townsville.qld.gov.au>  
**Subject:** 2501-44068 SRA application correspondence  
**Attachments:** 2501-44068 SRA - Advice notice.pdf  
**Importance:** Normal

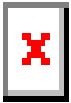
### This Message Is From an External Sender

This message came from outside Townsville City Council. Please think carefully before clicking links or responding if you weren't expecting this email.

Please find attached a notice regarding application [2501-44068 SRA](#).

If you require any further information in relation to the application, please contact the State Assessment and Referral Agency on the details provided in the notice.

*This is a system-generated message. Do not respond to this email.*  
GE77-N



Email Id: RFLG-0225-0022-8691

SARA reference: 2501-44068 SRA  
Applicant reference: 20477-012-01  
Council reference: MCU24/0125, RAL24/0085

6 February 2025

Parkside Development Pty Ltd  
C/- Brazier Motti  
595 Flinders Street  
TOWNSVILLE QLD 4810  
[Emma.Staines@braziermotti.com.au](mailto:Emma.Staines@braziermotti.com.au)

Attention: Ms Emma Staines

Dear Ms Staines

## SARA advice notice - 33 University Road, Annandale

(Advice notice given under section 35 of the Development Assessment Rules)

The State Assessment and Referral Agency (SARA) advises that your development application has not adequately demonstrated compliance with the State Development Assessment Provisions.

SARA has reviewed your application material and further to the email on 4 February 2025, the following issue(s) with the proposed development have been identified:

| Noise |  |
|-------|--|
| 1.    | <p><b><u>Issue:</u></b></p> <p>The Traffic Noise Investigation Report, prepared by Simpson Engineering Group, dated 29 Nov 2024, Ref 241107D02 does not adequately demonstrate compliance with the provisions of State code 1: Development in a state-controlled road environment (State code 1) of the State Development Assessment Provisions (SDAP).</p> <p>The report indicates that road construction was occurring along Townsville Connection Road during November 2024, impacting the ability of the report's authors to conduct traffic noise measurements near the site. The report also indicates that the developer proposes to apply an alternative to QDC MP4.4 and provides an indicative design based on assumptions. When any alternative to the QDC MP4.4 is proposed, it is recommended that internal noise criterion from Table 3: Maximum internal acoustic levels of State code 1 are applied and compliance with the code is demonstrated.</p> <p><b><u>Action:</u></b></p> <p>Provide an updated Traffic Noise Investigation Report that addresses the following:</p> <ul style="list-style-type: none"><li>Any alternative to QDC MP4.4 should apply the internal noise criterion from Table 3:</li></ul> |

|                                  |   |
|----------------------------------|---|
|                                  | <p>Maximum internal acoustic levels of State code 1 (<math>\leq 35</math> dB(A) Leq (1 hour) (maximum hour over 24 hours)).</p> <ul style="list-style-type: none"> <li>• SDAP requires compliance with free field noise criterion in private open space from AO38.1 and AO39.1 of PO38.</li> <li>• The traffic speed/s applied in the noise modelling should be summarised in the report.</li> <li>• The noise modelling should be based on earthworks drawings. The applicable earthworks drawings (drawing number, revision, and date) should be referenced in the report and a copy appended to the report.</li> <li>• Noise predictions on balconies should not consider any reduction due to solid balustrades.</li> <li>• All noise fences shall comply with all aspects of the Department of Transport and Main Roads' Technical Specification MRTS15. Lapped and capped timber fences do not comply with MRTS15.</li> <li>• Provide free field noise contours at 1.5m above finished surface levels which demonstrate compliance with free field noise criterion in all private open space at ground level as per AO39.1 of PO39. This may require 'zoomed in' noise contours to clearly demonstrate compliance. Noise barriers should not be limited to 4m if higher noise barriers are required to comply with noise criterion.</li> <li>• Provide free field noise contours at 1.5m above finished surface levels which demonstrate compliance with free field noise criterion in all areas of all lots for future accommodation activity as per AO38.1 of PO38. Noise barriers should not be limited to 4m if higher noise barriers are required to comply with free field criterion in private open space.</li> <li>• Demonstrate how the proposed development complies with PO42.</li> <li>• Provide noise predictions to demonstrate compliance with PO39 and PO40 for the proposed aged care. Noise barriers should not be limited to 4m if higher noise barriers are required to comply with noise criterion.</li> </ul> |
| <b>Traffic Impact Assessment</b> |   |
| 2.                               | <p><b>Issue:</b></p> <p>In order to demonstrate compliance with PO25-PO30 of SDAP State code 1, further clarity is required in relation to the Traffic Impact Assessment report (TIA), prepared by Northern Consulting Engineers, dated 10/12/2024, Ref number PARK0014 – TIA, Rev B.</p> <p>It is unclear whether traffic generated by the future Stages 2-4 on Proposed Lots 2, 3 and 4, has been taken into consideration when the TIA was prepared. The TIA has focused on the impact the development would have on the local government roads. As a result, an assessment of impacts upon the Gartrell Drive / Stuart Drive intersection are not considered within the report, other than a comparison and discussion in relation to the pre and post traffic generation along Gartrell Drive. Gartrell Drive / Stuart Drive intersection is currently being upgraded to a signalised intersection based upon the current and forecast traffic volumes within the TAIM, which has been reviewed and adopted as being appropriate by both Townsville City Council and the Department of Transport and Main Roads. However, it is unclear whether the forecasted traffic volumes are still current and whether the assessment took the traffic generated by the current and projected development traffic into consideration. Additionally, it is unclear whether the traffic impact assessment for the Townsville Connection Road included the potential future traffic generated by the proposed development under assessment.</p> <p>The TIA also states (in the last paragraph of section 6.0 Traffic Assessment) that "The site is</p>  |

|  |  |
|--|--|
|  | <p>proposed to be accessed via a new internal road extension of Lakeside Drive through to Stuart Drive at Edison Street. The road category proposed for this new section of road is a TCC major collector (Townsville City Council Drawing SD-002)." This statement does not make sense in context of the site.</p> <p><b>Action:</b><br/>Provide confirmation that the traffic generation and forecasting used in the TIA considered the entire future development of Lot 1 SP343205 (as per the staging as outlined in the Cottee Parker Proposed Site Plan and internal road network diagram).</p> <p>Provide confirmation regarding the proposed access to the site via a new road extension of Lakeside Drive through to Stuart Drive.</p>  |
| <b>Public Passenger Transport and Active Transport</b> |  |
| 3.   | <p><b>Issue:</b><br/>In order to demonstrate compliance with PO22 of SDAP State code 1, potential connectivity/linkages to the existing and/or proposed public passenger transport infrastructure, public passenger services and active transport infrastructure needs to be demonstrated.</p> <p>The subject site is well serviced by future active transport corridors and the Department of Transport and Main Roads is in the process of constructing a shared footpath from Lakeside Drive to Stuart Drive. However, the development plans do not indicate any connectivity from the proposed development to existing and/or proposed public passenger transport infrastructure, public passenger services and active transport infrastructure.</p> <p><b>Action:</b><br/>Provide amended site development plans indicating connectivity / linkages to the existing and/or proposed public passenger transport infrastructure, public passenger services and active transport infrastructure.</p> |

**Please note that unlike an information request, assessment timeframes do not stop when advice is provided by SARA.**

### How to respond

It is recommended that you address these issues promptly and provide a response to SARA by **11 February 2025**. If you decide not to respond, your application will be assessed and decided based on the information provided to date.

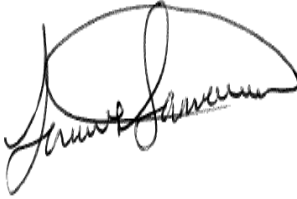
Under the [Development Assessment Rules](#) (DA Rules), the issuing of advice does not stop the assessment timeframes. If you intend to provide additional information, it should be provided in a timely manner to allow sufficient time for the information to be considered. As such, you are strongly encouraged to consider using the 'stop the clock' provisions under s32 of the DA rules, to allow sufficient time for you to consider and respond to SARA's advice; and for SARA to consider any new or changed material provided.

If you wish to utilise the 'stop the clock' provisions, you should give notice to the assessing authority (assessment manager or referral agency) whose current period you wish to stop. This can be done through MyDAS2 or via correspondence.

You are requested to upload your response using the 'manage documents' function in [MyDAS2](#).

If you require further information or have any questions about the above, please contact Bronwyn Bignoux, Principal Planning Officer, on 4747 3907 or via email [NQSARA@dsdilgp.qld.gov.au](mailto:NQSARA@dsdilgp.qld.gov.au) who will be pleased to assist.

Yours sincerely



Javier Samanes  
A/ Manager (Planning)

cc Townsville City Council, [developmentassessment@townsville.qld.gov.au](mailto:developmentassessment@townsville.qld.gov.au)

| Development details  |   |
|----------------------|---|
| Description:         | Development permit<br>Reconfiguring a Lot (One (1) Lot into Four (4) Lots) and New Road combined with Material Change of Use (Retirement Facility - 159 units)  |
| SARA role:           | Referral agency   |
| SARA trigger:        | Schedule 10, Part 9, Division 4, Subdivision 2, Table 1, Item 1 (Planning Regulation 2017) – Reconfiguring a lot near a state transport corridor<br>Schedule 10, Part 9, Division 4, Subdivision 2, Table 2, Item 1 (Planning Regulation 2017) – Reconfiguring a lot in a future state transport corridor<br>Schedule 10, Part 9, Division 4, Subdivision 2, Table 3, Item 1 (Planning Regulation 2017) – Reconfiguring a lot near a state-controlled road intersection<br>Schedule 10, Part 9, Division 4, Subdivision 2, Table 4, Item 1 (Planning Regulation 2017) – Material change of use of premises near a state transport corridor or that is a future state transport corridor |
| SARA reference:      | 2501-44068 SRA  |
| Assessment criteria: | SDAP State code 1: Development in a state-controlled road environment   |