18 April 2026

Townsville City Council
PO Box 1268
TOWNSVILLE QLD 4810

USC Reference: USC119

Dear Sir/Madam

DEVELOPMENT APPLICATION FOR A DEVELOPMENT PERMIT FOR MATERIAL CHANGE OF USE FOR MULTIPLE DWELLING (14 UNITS)
177-179 FRANCIS STREET, WEST END (LOT 1 ON RP711746, LOT 2 ON RP711746, LOT 3 ON RP711746 AND LOT 4 ON RP711746)

On behalf of Kaenetto Investments, please accept this development application for a Development Permit for Material Change of Use for Multiple Dwelling (14 Units) at 177-179 Francis Street, West End, formally known as Lot 1 on RP711746, Lot 2 on RP711746, Lot 3 on RP711746 and Lot 4 on RP711746.

If you have any questions regarding the application, please do not hesitate to contact the office.

Yours sincerely,

URBAN SPACE CONSULTING

Encl: Development Application Package

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TOWN PLANNING REPORT

177-179 FRANCIS STREET
WEST END

LOTS 1-4 ON RP711746

APRIL 2026

PREPARED FOR KAENETTO INVESTMENTS

URBAN SPACE CONSULTING

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Executive Summary

Proposed Development

Type of Approval	Category of Assessment	Planning Scheme Use
Development Permit	Impact Assessment	Multiple Dwelling (14 Units)

Subject Site Details

Subject Site Address	177-179 Francis Street, West End QLD 4810
Property Description	Lot 1 on RP711746, Lot 2 on RP711746, Lot 3 on RP711746 and Lot 4 on RP711746
Site Area	4,436m^2
Landowner	Kaenetto Investments Pty Ltd A.C.N 684 140 485
Local Government	Townsville City Council
Planning Scheme	Townsville City Plan
Zoning	Low Density Residential Zone
Relevant Overlays	OM1 – Operational Airspace and Wildlife Hazard Buffer Overlay OM3.1 – Environment Coastal Hazard Area – Storm Tide Inundation Area OM6.1 – Development Constraints Flood Hazard OM10.1 – Major Infrastructure and Hazardous Facilities OM11.1 – Development Constraints Transport Noise Corridors
State Referrals	Schedule 10, Part 9, Division 4, Subdivision 2, Table 4 ▪ Within 25m of a State transport corridor (State-controlled road)
State Planning Policy	Strategic Airports and Aviation Facilities Natural Hazards Risk and Resilience Transport Infrastructure Biodiversity

Applicant Details

Applicant	Contact Details	Reference
Kaenetto Investments C/- Urban Space Consulting	urbanspaceconsulting@outlook.com 0404 539 291 PO Box 5161 West End QLD 4101	USC119

1.0 Introduction

Urban Space Consulting, on behalf of Kaenetto Investments, has prepared this development application for a proposed development at 177-179 Francis Street, West End, formally known as Lot 1 on RP711746, Lot 2 on RP711746, Lot 3 on RP711746 and Lot 4 on RP711746 (subject site). This development application seeks approval for a Development Permit for a Material Change of Use for a Multiple Dwelling (14 Units)

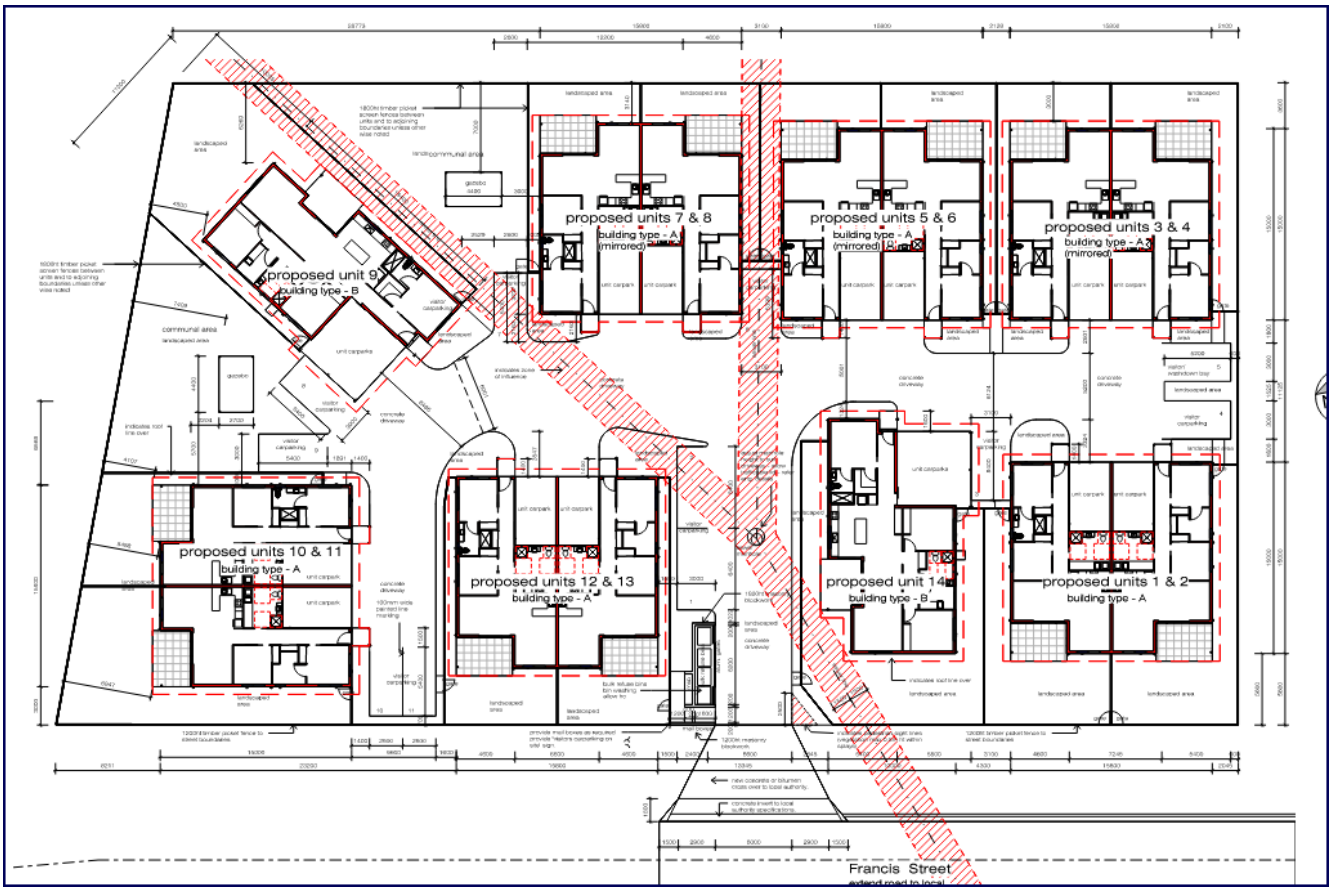

Figure 1: Proposed Development (source: Concepts Building Design)

This report addresses the merits of the proposed development with regard to the assessment benchmarks under the Townsville City Plan and the relevant sections of the *Planning Act 2016* (*Planning Act*).

This development application should be read in conjunction with the following supporting materials:

- Appendix A – DA Form
- Appendix B – Title Searches and Smartmap
- Appendix C – Land Owner Consent
- Appendix D – Proposal Plans prepared by Concepts Building Design
- Appendix E – Detail and Contour Survey prepared by Atkinson Surveys
- Appendix F – Traffic Engineering Report prepared by Modus
- Appendix G – Operational Waste Management Plan prepared by Modus
- Appendix H – Engineering Report prepared by STP Consultants
- Appendix I – Acoustic Report prepared by Acoustic Works
- Appendix J - SPP Mapping Report
- Appendix K – SARA Mapping
- Appendix L – SDAP Code Responses prepared by Urban Space Consulting
- Appendix M – Planning Scheme Assessment Benchmarks prepared by Urban Space Consulting

2.0 Subject Site and Surrounds

2.1 Subject Site

The proposed development is located at 177-179 Francis Street, West End shown in **Figure 2**. The subject site is located within the residential area of West End and is surrounded by low density residential zoning north, east and south, Percy Street (State-controlled road) to the west, as shown **Figure 3.**

Figure 2: Subject Site and Surrounding locality (source: Nearmap)

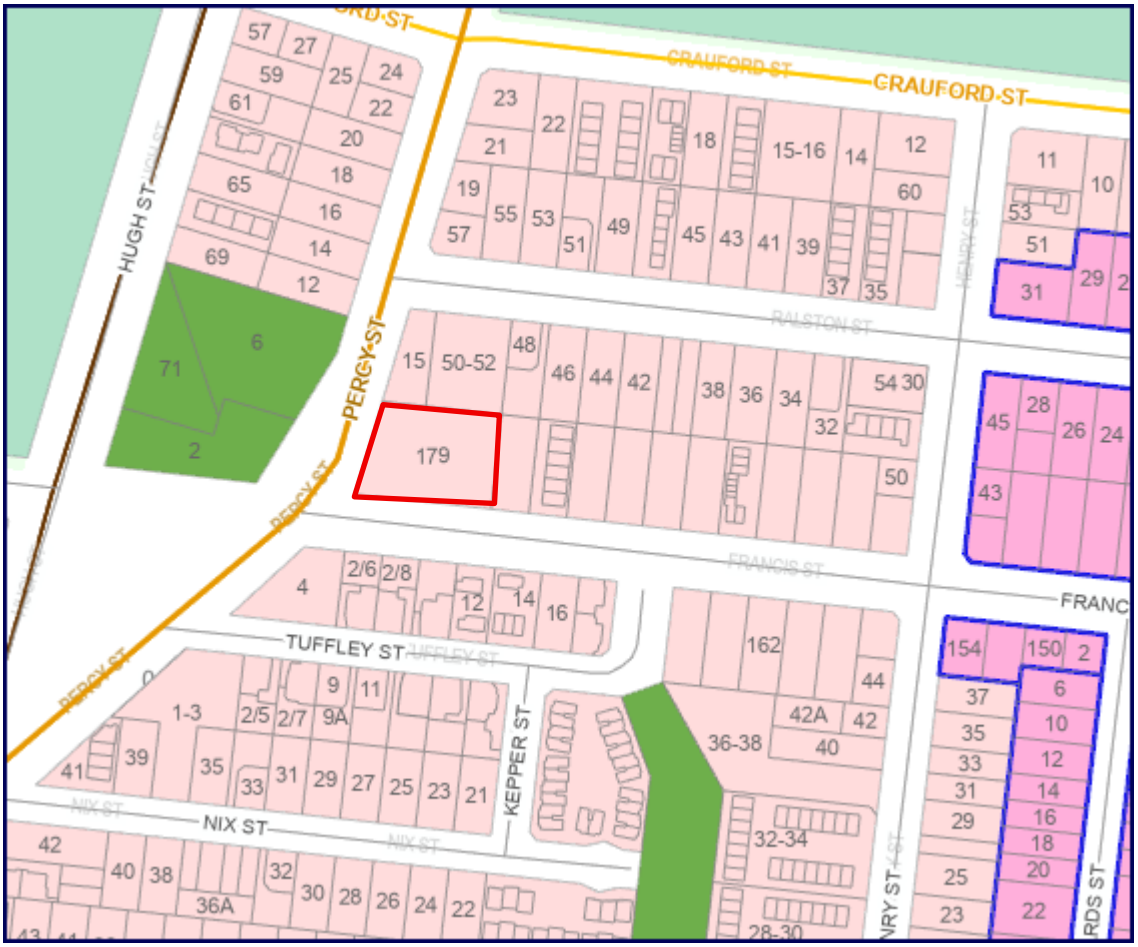

Figure 3: Planning Scheme Land Use Zoning (source: Townsville City Plan)

2.2 Surrounding Context

The subject site is situated in a predominantly residential area that combines suburban charm. West End is known for its family-friendly atmosphere and accessibility to local amenities. The surrounding context features a mix of established homes, green spaces and neighbourhood centres, with a pleasant neighborhood feel. The locality blends modern developments in the area with existing character. The location benefits from its proximity to key roads and public transportation, offering a balance between suburban living and convenient access to the broader city infrastructure, as shown in **Figure 4**.

Figure 4: Subject Site and Surrounding locality (source: Open Street Map)

2.4 Easements and Encumbrances

There are currently no easements or encumbrances over the subject site, as shown in **Figure 5**.

Figure 5: Lot Boundaries and Easements (source: Queensland Globe)

3.0 Proposed Development

The proposal seeks a Development Permit for a Material Change of Use for a Multiple Dwelling(14 Units).

The proposed development is for a multiple dwelling development to accommodate family dwellings, designed to blend seamlessly with the surrounding neighbourhood. This project will feature state-of-the-art amenities, including elegant dwellings and a vibrant community hub. Residents will enjoy a lifestyle rich in beautiful green spaces, all while having access to top-tier centres accessed along Percy Street. This development promises not only a comfortable and active lifestyle but a thriving, supportive community where every need is met with excellence and warmth. Proposal Plans of the proposed development have been provided in **Appendix D**.

Figure 6: Proposed Development 3D Render (source: Concepts Building Design)

3.1 Development Details

A summary of the key components of the development proposal are summarised below in Table 2.

Table 2: Summary of Development

Key Development Parameter	Proposed Development
Defined Land Uses	Multiple Dwelling
Staging	The development will be constructed as one stage
Number of dwellings	14 dwellings
Dwelling mix	Building Type A: ▪ 2 bedroom, 2 bathroom Building Type B: ▪ 3 bedroom, 2 bathroom
Building Height	1 storey
Access	Access to all dwellings will be from Francis Street (extended)
Car Parking	27 carparking spaces total
Servicing	HRV loading can occur onsite and access provided from Francis Street

3.2 Description of Proposed Development

This development application seeks approval for a Development Permit for Material Change of Use for a Multiple Dwelling (14 x Units). The development provides an exciting opportunity to deliver much needed housing, with a primary focus being conveniently located with suburban amenity. The proposal provides an efficient use of residential zoned land and is consistent with the establishing pattern of development in the immediate context and the wider urbanised area and suburb of Cranbrook.

The subject site is located within an established urban locality characterised by a mix of detached dwellings and low-rise unit developments. The surrounding Francis Street corridor and broader West End area demonstrate an existing pattern of multiple dwelling sites, including small unit complexes and walk-up apartments, reflecting a transition toward increased residential density. Nearby properties along the same street comprise established unit developments, indicating that multi-unit housing is a consistent and accepted built form within the immediate locality.

In this context, a development comprising 14 units is considered consistent with the prevailing residential character and aligns with the intent of the Townsville City Council planning framework, which supports a diversity of housing types and incremental increases in density in well-located urban areas. As such, the proposed development would integrate seamlessly into the existing streetscape and built form pattern without introducing a scale or intensity that is out of character with the surrounding locality.

The proposed development application for a multiple dwelling directly aligns with the objectives of the Townsville City Council Local Housing Action Plan 2024–2027, which seeks to increase housing supply, promote infill development, and diversify housing options across the region. By delivering medium-density housing within an existing urban footprint, the proposal supports Council's goal of boosting the proportion of infill development from less than 5% to at least 10% annually. The design responds to the Plan's emphasis on housing diversity by offering an alternative to detached dwellings, catering to evolving household structures and affordability needs. Additionally, the development leverages existing infrastructure and services, consistent with Council's strategy to optimise land use and reduce urban sprawl. This application contributes to the Plan's broader vision of creating vibrant, walkable communities that accommodate Townsville's projected population growth while maintaining liveability and economic resilience.

Furthermore, the Queensland Government's Securing our Housing Foundations plan outlines a strategic approach to addressing housing challenges across the state. With a commitment to delivering 1 million new homes by 2044, the plan aims to ensure sustainable growth and accessibility for all Queenslanders. By focusing on infrastructure, affordability, and long-term planning, the initiative seeks to create a more resilient housing market that meets the needs of both urban and regional communities. The proposed application directly contributes to these goals, offering a practical solution to Queensland's housing crisis.

4.0 Specialist Supporting Material

The following specialist material has been undertaken in support of the proposed development:

- Proposal Plans, prepared by Concepts Building Design
- Traffic Engineering Report, prepared by Modus
- Operational Waste Management Report, prepared by Modus
- Engineering Report prepared by STP Consultants
- Acoustic Report, prepared by Acoustic Works

A summary of the key findings of each of the technical reports is provided below, including the key elements proposed for the application and the matters that affect the assessment of the application.

4.1 Proposal Plans

A consistent theme has been applied to the development for uniformity and sense of community with subtle changes provided in colour. The theme is 'simplistic modern elegance' and responds to the immediate built environment of nearby residences. The design seeks to maximize and leverage from a northerly aspect and is achieved with a north/south orientation.

The intentional architectural outcome of the development represents an exemplar outcome for modern and sustainable design. The proposed development has been designed in accordance with advice from engineers and Council to ensure the design is capable to be built in a cost effective and efficient manner.

4.2 Traffic Engineering Report

The Traffic Engineering Report prepared by Modus for the proposed multiple residential development, concludes the project is acceptable from a traffic and transport engineering perspective. It confirms compliance with driveway and crossover design standards, identifies modest traffic generation, and shows no significant impact on surrounding intersections, all of which operate within acceptable thresholds.

4.3 Operational Waste Management

The Operational Waste Management Plan outlines the refuse generation, storage, transfer and servicing arrangements for the proposed development. It details the expected waste volumes based on Townsville City Council generation rates, confirming the need for four 1100L bulk bins (two general waste and two commingled recycling) stored within a purpose-built refuse enclosure. The plan describes how residents will manage daily waste, how bins will be transferred approximately 5 m to the servicing area, and how Council's rear-loading collection vehicle will service the site on-site via a safe manoeuvring path. It also outlines operational procedures, minimisation strategies, equipment options, signage requirements, and ongoing management responsibilities to ensure compliant, efficient and safe waste handling throughout the building's operational life.

4.4 Engineering Report

The Engineering Report confirms the site can be serviced and developed without major constraints. The land is unaffected by the 1% AEP flood event, though coastal hazard mapping requires minimum floor levels of RL3.9 m AHD. Only minor earthworks are needed, and existing overland flow paths and a small external catchment are accommodated in the design. Stormwater will be captured, treated via Atlan Stormsacks and a FlowFilter unit, and discharged to the lawful points of discharge on Francis and Percy Streets, with no detention required due to a low impervious fraction. Water and sewer network modelling shows sufficient capacity for the development, with new connections required but no upgrades. Power and telecommunications will be extended to the site. Overall, the report concludes there are no engineering impediments for the development.

4.5 Acoustic Report

The acoustic report assesses road traffic noise impacts on the proposed development, with a focus on noise generated from Percy Street, a State-controlled road. Unattended noise monitoring was undertaken over several weeks to establish existing ambient and traffic noise levels, which were then used to model future noise conditions to the year 2036 in accordance with SDAP and Queensland Development Code MP4.4 requirements. The assessment confirms that predicted noise levels can be mitigated through a combination of acoustic barriers, upgraded glazing, alternative ventilation, and compliant wall and roof constructions to ensure internal and external acoustic criteria are met. The report concludes that, with the recommended treatments, the development can achieve the required noise performance standards for habitable rooms and private open space.

5.0 Prelodgement Discussions

On 14 August 2025, representatives of Urban Space Consulting and Kaenetto Investments met with Townsville City Council officers to discuss the proposed development (Council Ref: PLM25/0146). The table below provides a summary of Council's advice, as well as how the proposed development has considered the advice.

Table 3: Summary of Prelodgement Meeting Discussion

Item	Council's comments	Proposal Response
1. Proposal Overview	▪ The proposal involves a multiple dwelling development comprising 22 units. ▪ The site is located within proximity to key amenities including a shopping centre, parks, and public transport, aligning with locality requirements for multiple dwellings. ▪ The development supports the Housing Action Plan and infill development objectives.	After working through concept design, engineering and improving amenity for the site and surrounds, it has resulted in a lower density for the development with a total of 14 dwellings. Although the site could be designed for a higher yield, given its location and size, 14 dwellings provides a higher level of amenity for future residents and home owners.
2. Engineering Considerations	<u>Flooding and Stormwater</u> ▪ Site is not significantly affected by flooding under current and upcoming flood mapping. ▪ Storm Water Management Plan (SWMP) is to be prepared in accordance with the current AR&R, QUDM, and rainfall intensities to demonstrate how Minor and major flows are managed, and must consider: ▪ Quantity • Minor flow: Stormwater from the site for the design rainfall event is to be discharged to the legal point of discharge at the predevelopment flow rate or the capacity of downstream network whichever is lesser. Stormwater exceeding the allowed flow rate is to be detained on site. • Major flow: overland flow for major rainfall event is to be directed towards the road reserve. If via private properties, then need to provide drainage easement. • Stormwater drainage design is to incorporate no nuisance to the neighbouring properties due to the proposed development. ▪ Quality – • Stormwater is to be treated onsite prior to discharging to LPOD to demonstrate compliance with the water quality objectives of SPP. • Stormwater quality treatment device is to be private in nature.	An Engineering Report is provided in **Appendix H**.

	<u>Stormwater</u> ▪ Storm Water Management Plan (SWMP) is to be prepared in accordance with the current AR&R, QUDM, and rainfall intensities to demonstrate how Minor and major flows are managed, and must consider: ▪ Quantity • Minor flow: Stormwater from the site for the design rainfall event is to be discharged to the legal point of discharge at the predevelopment flow rate or the capacity of downstream network whichever is lesser. Stormwater exceeding the allowed flow rate is to be detained on site. • Major flow: overland flow for major rainfall event is to be directed towards the road reserve. If via private properties, then need to provide drainage easement. • Stormwater drainage design is to incorporate no nuisance to the neighbouring properties due to the proposed development. ▪ Quality – • Stormwater is to be treated onsite prior to discharging to LPOD to demonstrate compliance with the water quality objectives of SPP. • Stormwater quality treatment device is to be private in nature.	An Engineering Report is provided in **Appendix H**.
	<u>Flood Hazard Overlay</u> ▪ Minimal affect by 1%AEP storm event per new flood mapping. ▪ Any minor adjustments can be addressed via Stormwater Management Plan ▪ Floor level for habitable buildings to be 300mm above the DFE in accordance with QUDM (or floor level requirement per coastal whichever is greater).	An Engineering report is provided in **Appendix H**.
	<u>Coastal environment overlay code</u> ▪ The Coastal hazard overlay code requirements must be considered for any future built form outcomes proposed over the subject site i.e. 3.05 m AHD lot levels and 3.9m AHD FFL for all habitable areas.	An Engineering report is provided in **Appendix H**.
	<u>Reticulated water</u> ▪ Detailed network analysis to confirm capacity and pressure requirements ▪ boundary condition information can be requested with council, and/or access to Council's network models by submitting a "Request for Network Modelling Information" form ▪ Fenced structure (raised in the meeting) appears to be air valve /scour valve and needs to be confirmed during the design phase via dial before you dig and onsite inspection. If scour valve, then council may consider heavy duty	An Engineering report is provided in **Appendix H**.

	driveable manhole over at the same location. If air valve than needs to be relocated. ▪ Existing water main within the development frontage is 750mm diameter major infrastructure. Utmost care must be taken during design and construction phase to ensure no impact to the water main. Applicant is encouraged to liaise with council after the preliminary design (i.e. After the survey/investigation of the existing water main and other under and over ground structure are carried out). Request can be made to Council if the main hole lids are locked and need to be unlocked for survey/investigation purpose.	
	<u>Sewer</u> ▪ Construction of dwelling or access over the existing sewer trunk line is not supported. ▪ Council may consider removal and relocation of existing sewer gravity main at the developers cost. Realignment to follow DTMR road reserve at west of 179 Francis Street and Council Road reserve at the south of 179 Francis Street. ▪ Constructability must also be considered to maintain operational capability of existing services, and the design would need to demonstrate continuous operation with a limited 4 to 6-hour shutdown period. ▪ Detailed design is to be submitted for councils' approval and must comply with current CTM requirements. ▪ Driveway crossing over trunk line may be allowed provided that applicant could demonstrate it cannot be achieved in other areas. ▪ Service connections cannot be obtained from trunk sewer. ▪ Building near or over to services will be required for non-trunk lines if performance outcome and acceptable outcome of QDC MP1.4 is not met. ▪ Connection points will need to have clearance of 1m at all sides ▪ Detailed network analysis to confirm capacity and pressure requirements ▪ Boundary condition information can be requested with council, and/or access to Council's network models by submitting a "Request for Network Modelling Information" form ▪ Sewer if at the rear will require a minimum of 1.5m clear access from the road frontage	An Engineering report is provided in **Appendix H**.
	<u>Traffic</u> ▪ Traffic Impact Assessment will be required. Consider following: • Refer SC6.4.5.2 (3) of city plan for impact level of TIA and Requirement	A Traffic Engineering report is provided in **Appendix F**.

	• For Material Change of use, Francis Street is to be extended up to the farthest proposed driveway. • Proposed road width is to allow for two-way traffic and incorporate necessary line marking, signage, LATM device as per Austroads requirement for safe transition if a reduced road width is proposed. • Formal MCU application is to demonstrate turning of service vehicles (council waste/recycle truck) within the road reserve and within the road pavement. • Formal MCU application is to incorporate swept paths with design and check vehicles for entry and exit to the driveway and within the development site. • Driveways are to be constructed to commercial/industrial standard • Sight distance analysis of design vehicle exiting the development site, with pedestrian over the footpath/nature stip. • Sight distance analysis of design vehicle exiting the development site with vehicles on the public road in accordance with Australian standard. • Consider Local area traffic management as necessary. • Road design to incorporate other essential road infrastructures such as kerb and channel, underground drainage, street lights etc	
	<u>Parking</u> ▪ To be contained within the development site.	A Traffic Engineering report is provided in **Appendix F**. The development has been designed to ensure compliant carparking.
	<u>Waste collection</u> ▪ Show waste collection location with dimensions. Refer SC6.4.22.7 of planning scheme for bulk waste facilities (if MCU) ▪ Commercial bins and on street collection is acceptable only if bins are brought to the kerb by the owner/developer. Council does not collect bins from bin storage area. ▪ Waste management plan to include a scaled plan showing bins located on kerbside to ensure the bins remain within the property frontage for collection. ▪ Council will charge for waste service as part of rates, even if waste collection is undertaken by a private contractor.	An Operational Waste Management Plan is provided in **Appendix G**.
	<u>Street trees</u> ▪ To be provided per council policy.	These can be conditioned by Council.
	<u>Footpath</u> ▪ To be provided per council policy.	These can be conditioned by Council.

	<u>Acid Sulphate Soil</u> ▪ Site is below 5mAHD therefore ASS Management plan will be required prior to construction and can be conditioned	These can be conditioned by Council.
	<u>Erosion and Sediment</u> ▪ Can be provided during operational work application ▪ Need to meet SPP target and designed in accordance with IECA ▪ Site exceeds 2500m2, RUSEL calculation will be required to inform what treatment type is required.	These can be conditioned by Council.
	<u>Poly-Fluoroalkyl Substances (PFAS)</u> ▪ Due to the recent discovery of PFAS within the Townsville Local Government area, it is strongly recommended that an independent Human Health Risk Assessment be undertaken over the subject site to ensure there are no impacts to human health resulting from potential environmental exposure to PFAS. The applicant is advised further information can be obtained via: https://www.pfas.gov.au/ or http://www.health.gov.au/pfas. ▪ PFAS contaminated map is here: Australian PFAS Chemicals Map - Highlighting contamination sites. (australianmap.net)	These can be conditioned by Council.
3. Planning and Design Considerations	<u>Zoning and Density</u> ▪ Site is zoned Low Density Residential. ▪ Proposal is impact assessable and subject to public notification. ▪ Density is higher than typical (1 dwelling per 200m² vs. 400m² in code). ▪ Application should justify how amenity is maintained despite increased density.	While the proposed density is higher than the typical 1 dwelling per 400 m² benchmark, the development has been significantly scaled down from 22 dwellings to 14, resulting in a much lower overall site intensity. This reduction materially improves the interface with neighbouring properties by decreasing building bulk, traffic generation, and overall site activity. The revised layout provides generous landscaping, improved separation between buildings, and a softer built form that maintains residential amenity for both future residents and adjoining neighbours. Importantly, the proposal also makes a meaningful contribution to the Townsville Housing Action Plan by delivering well-designed infill housing at a time of acute local housing shortage. The outcome

		strikes an appropriate balance between supporting housing supply and preserving neighbourhood amenity.
	<u>Open Space and Amenity</u> ▪ Private open space generally complies (~25m² per unit). ▪ Communal open space must be functional. ▪ Landscaping and screening are important for amenity and privacy.	The design of the development has taken Council's advice into consideration.
	<u>Car Parking</u> ▪ 34 spaces proposed for 22 units ▪ Consideration needed for bicycle racks, e-scooter charging, and visitor parking.	A Traffic Engineering report is provided in **Appendix F**. The development has been designed to ensure compliant carparking.
	<u>Setbacks and Privacy</u> ▪ Clarification needed on rear setbacks (1.5m vs. 4m). ▪ Screening required for balconies, bin areas, clotheslines, and car parking.	The design of the development has taken Council's advice into consideration.
4. Architectural Considerations	▪ Western-facing clerestory windows not recommended due to heat gain. ▪ Cross-ventilation and natural light should be maximised. ▪ Avoid box gutters due to high rainfall risk. ▪ Disability access requirements must be addressed (e.g., circulation space, compliant bathrooms). ▪ Mechanical ventilation or skylights may be needed for internal bathrooms. ▪ Consider placement of air conditioning units, hot water systems, and letterboxes to preserve landscaping.	The design of the development has taken Council's advice into consideration.
5. Road and Infrastructure Design	▪ Consideration of road reserve use for driveways was discussed but not supported by Council. ▪ Any proposal to alter road hierarchy or use road reserve must be formally assessed. ▪ Footpath connection to Percy Street likely required. ▪ Street trees and stormwater management in public space must be addressed.	The design of the development has taken Council's advice into consideration.

6.0 State Planning

6.1 Legislative Framework

The Planning Act provides a legislative framework for planning and development matters across most areas of Queensland. It is identified that this framework established by the Planning Act is relevant to the proposed development. To this end, the proposed development is not located within a Priority Development Area, State Development Area, Infrastructure Designation area, other or specific land use planning jurisdiction.

The Planning Act nominates several types of works within the definition of development.

Specifically, relevant to the proposed development, Schedule 2 of the Planning Act identifies the following types of works as being classified as *development* making a *material change of use of premises*. A *material change of use, of premises, means any of the following that a regulation made under section 284(2)(a) does not prescribe to be minor change of use—*

(a) the start of a new use of the premises;

(b) the re-establishment on the premises of a use that has been abandoned;

(c) a material increase in the intensity or scale of the use of the premises.

In view of the above definitions, the proposed development reflects a Material Change of Use.

6.2 State Planning Policy

The State Planning Policy (SPP) was introduced on 3 July 2017 as part of the new State planning system. The SPP defines the Queensland Government's policies about matters of state interest in land use planning and development and provides direction for the preparation of local planning instruments and assessment of development applications. The SPP also includes assessment benchmarks for some development applications, if a planning scheme does not appropriately integrate the relevant state interest.

The SPP provides supporting mapping to assist in spatially representing policies and requirements contained within the SPP (refer **Appendix J**).

The mapping indicates that the following SPP matters apply to the site:

- Strategic Airports and Aviation Facilities:
  - Wildlife hazard buffer zone
  - Lighting area buffer 6km
  - Aviation facility
  - Height restriction zone – 15m
- Natural Hazards Risk Resilience:
  - Medium storm tide inundation area
  - Flood Hazard Area – Level 1 – Queensland floodplain assessment overlay
  - Flood Hazard Area – Local government flood mapping area
- Transport Infrastructure:
  - State-controlled road
- Biodiversity:
  - MSES – Regulated vegetation (category R)

It is noted that the Townsville City Plan has not been prepared to fully reflect the latest SPP, and assessment of any proposed development against the Townsville City Plan will therefore require assessment against SPP.

The SPP contains assessment benchmarks that are expressed as performance outcomes for the purpose of development assessment. Importantly, these assessment benchmarks apply to the extent the SPP has not been identified in the Townsville City Plan as appropriately integrated. The proposed development has been assessed against and demonstrated to comply with the SPP assessment benchmarks for Natural Hazards Risk and Resilience, Transport Infrastructure, Biodiversity and Strategic Airports and Aviation Facilities.

6.4 State Assessment Referral Agency

The State Assessment and Referral Agency (SARA), seeks to deliver a coordinated, whole-of-government approach to the state's assessment of development applications. The State Development Assessment Provisions (SDAP) is an outcome of the SARA and a statutory instrument made under the Planning Act which sets out matters of interest of the state for development assessment, where the chief executive of administering the Planning Act is the assessment manager or a referral agency.

Importantly, the SDAP provide assessment benchmarks for the assessment by the chief executive officer or a referral agency and provides applicants with the opportunity to address performance criteria to demonstrate that a development appropriately manages any impacts on a matter of state interest, and/or protects a development from impacts of matters of state interests. An extract from the SDAP Mapping is shown in **Figure 7** below and is attached in **Appendix K**. An assessment of Schedule 10 of the Planning Regulation has identified the application will require referral to SARA. A response to the relevant SDAP codes is provided in **Appendix L**.

Specifically, the proposed development is required to be referred in accordance with the following sections of the Planning Regulation:

- Schedule 10, Part 9, Division 4, Subdivision 2, Table 4
  - Within 25m of a State transport corridor (State-controlled road)

Figure 7: SARA DA Mapping (source: Development Assessment Mapping System)

7.0 Local Government Planning

7.1 Local Planning Instrument

The Townsville City Plan is the local planning instrument that is used to assess the proposed development. The following sections of this report provide an assessment of the proposed development against the assessment benchmarks under the Townsville City Plan.

7.2 Definitions

The proposed development is identified within the Townsville City Plan as Multiple. The Planning Scheme identifies:

Multiple Dwelling

- *Premises containing three or more dwellings for separate households.*

7.3 Zoning

The subject site is included in the Low Density Residential Zone of the Planning Scheme, as shown in **Figure 7** below.

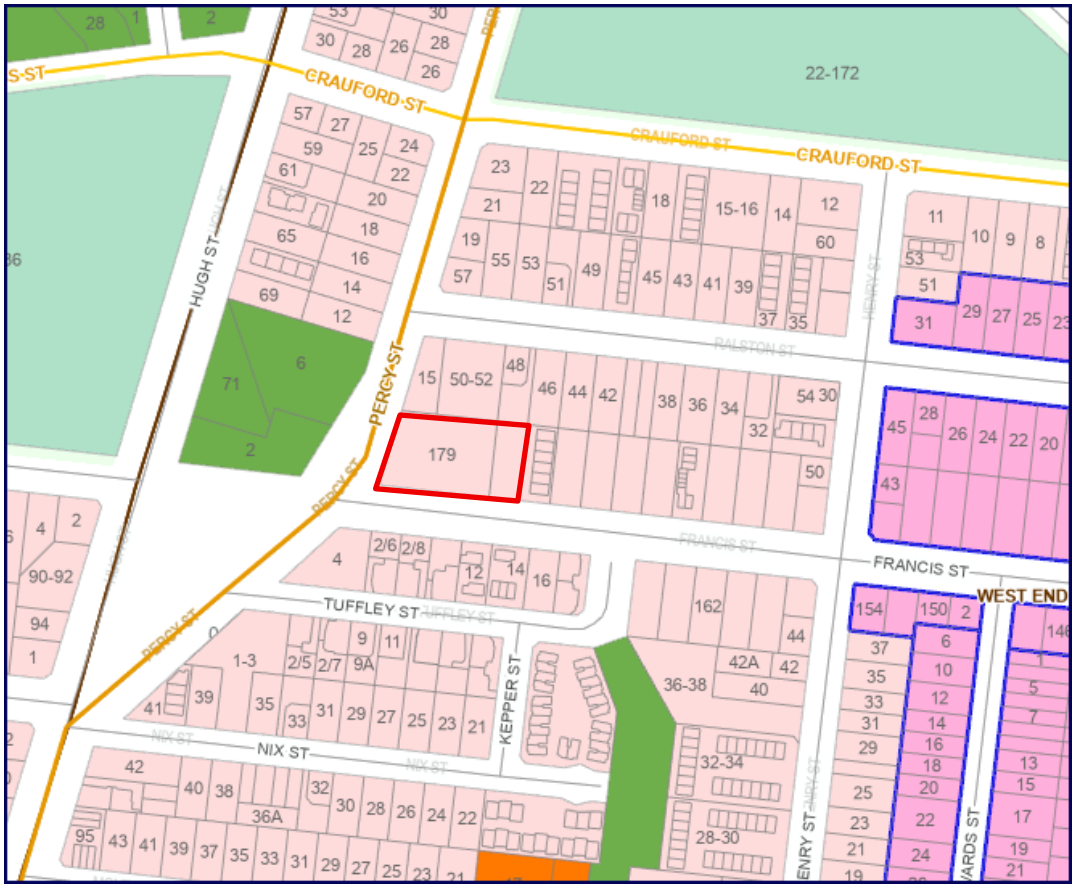

Figure 7: Subject Site Zone Mapping (source: Townsville City Plan)

The purpose of the Residential Low Density Zone is to be achieved through the following overall outcomes:

a) *built form is of a house compatible scale and consistent with the local streetscape character;*

b) *reconfiguration facilitates a range of lot sizes to accommodate dwelling houses and dual occupancy dwellings, typically on lots 400m^2 or greater (unless otherwise intended in a precinct);*

c) *development maintains a high level of residential amenity on the site and in the neighbourhood;*

d) *residential development is protected from the impacts of any nearby industrial activities, transport corridors, infrastructure, installations and major facilities such as the port, airport and Department of Defence landholdings;*

e) *the design of development promotes accessibility by walking, cycling and public transport;*

f) *the design of development is responsive to the city's climate and promotes sustainable practices including energy efficiency and water conservation;*

g) low-rise multiple dwellings, residential care or retirement facilities may be acceptable within this zone where provided in locations that are within a convenient walkable distance to centres, public transport and community activities, and where of a scale that is consistent with the local character;

h) *non-residential uses only occur within the zone where they primarily support the day-to-day needs of the immediate residential community, do not unreasonably detract from the residential amenity of the area and are not better located in nearby centre zones;*

i) *development minimises impacts on remaining areas of ecological significance within the zone; and*

j) *the natural bushland setting and village character of the northern beaches and Magnetic Island townships are maintained. Tourism accommodation in these communities is of a house compatible scale.*

In particular, AO22 of the Low density residential zone code identifies:

Location	
PO21 Multiple dwelling, residential care facility or retirement facility development occur only in locations where: a) they can be designed to be compatible with local character and low density scale of development; b) having convenient walkable access to the city's network of centres; c) having convenient walkable access to public transport; and d) having convenient walkable access to recreational facilities.	**AO21** The premises: a) is located within 400m of a centre zone or public transport stop on a major road; b) has a minimum site area of 1,000m² and 20m frontage where for a multiple dwelling; c) has a minimum site area of 3,000m² and 20m frontage where for a residential care facility or retirement facility; and d) is located within 400m of a park.

Figure 8 below shows the subject sites optimal location to centres, public transport, parks and has suitable site area and dimensions for a multiple dwelling.

Figure 8: Locality Map (source: Urban Space Consulting)

The proposed development is able to fulfil the intent of the Residential Low Density Zone as it is for a residential use that provides full urban services and is well located to provide sense of place.

7.4 Category of Assessment

The development application includes a Development Permit for Material Change of Use.

Table 5.5.1: Low density residential zone, does not identify a multiple dwelling within the table, and therefore requires **Impact Assessment** and assessment against the Townsville City Plan is required**.**

7.5 Codes of Assessment

The following Assessment Benchmarks are considered relevant to the proposed development:

- Low density residential code
- Airport environs overlay code
- Coastal environment overlay code
- Flood hazard overlay code
- Major infrastructure and hazardous facilities overlay code
- Healthy waters code
- Landscape code
- Traffic, impact, access and parking code
- Works code

7.6 Assessment Against Strategic Framework

The proposed development within the Low Density Residential Zone, while impact assessable, can demonstrate strong compliance with the Townsville City Plan strategic framework as it responds to the broader planning vision for housing diversity, urban consolidation, and community resilience.

The strategic framework encourages a compact urban form that supports infill development and efficient use of existing infrastructure. By delivering medium-density housing in an established suburb, the proposal contributes to the Townsville City Plan's goal of increasing housing choice and affordability, particularly in areas well-serviced by transport, education, and employment hubs. This aligns with the framework's emphasis on shaping Townsville as a connected and sustainable city that accommodates growth without compromising liveability.

Furthermore, the development supports the strategic outcome of creating a strong and connected community by integrating communal open space, pedestrian connectivity, and landscaping that enhances neighbourhood character. Although the Low Density Residential Zone typically anticipates detached dwellings, the impact assessment process allows for a merit-based evaluation where the proposal can demonstrate negligible amenity impacts, appropriate setbacks, and architectural articulation. The proposed development is supported by traffic, engineering, and waste management reports confirming operational suitability, the multiple dwelling use can be considered consistent with the strategic intent, particularly when it contributes to housing supply targets and aligns with the Townsville Local Housing Action Plan 2024–2027.

Therefore, it is considered the development aligns with:

- 3.3.2 Element – City shape and housing
  - 3.3.2.1(1)
  - 3.3.2.1(7)
  - 3.3.2.1(8)
  - 3.3.2.1(9)
- 3.4.2 Element – Urban design
  - 3.4.2.1(1)
  - 3.4.2.1(4)

8.0 Conclusion

Urban Space Consulting, has prepared this town planning report in support of a development application on behalf of Kaenetto Investments. This development application seeks approval for a:

- Development Permit for a Material Change of Use for a Multiple Dwelling (14 x Units)

The proposed development represents a strategically sound, technically supported and policy-aligned response to Townsville's evolving housing needs. Drawing upon best-practice design principles and a suite of expert assessments, the application achieves strong compliance with local and state planning frameworks. Key strengths of the proposal include:

- **Strategic Location**: Delivers medium-density infill housing within walking distance of centres, public transport, and open space—fulfilling AO21 locational criteria under the Low Density Residential Zone Code.
- **Built Form Integration:** Low-rise design and articulated facades complement existing neighbourhood character while elevating streetscape amenity.
- **Policy Alignment**: Directly addresses Townsville City Council's Housing Action Plan 2024–2027 and Queensland's Securing our Housing Foundations agenda, supporting increased housing supply and diversity.
- **Traffic & Parking Compliance**: Traffic impacts are negligible; alternative car parking benchmarks and a robust management plan address policy shortfalls.
- **Engineering Certainty**: Civil and hydraulic reports confirm capacity, lawful discharge, water quality compliance and negligible post-development runoff.
- **Efficient Servicing**: Waste management strategy aligns with SC6.4.22 policy and enables safe on-site collection through rear-loading vehicles.
- **Landscape & Amenity**: Subtropical planting, communal spaces, and pedestrian connections strengthen neighbourhood cohesion and outdoor liveability.
- **Strategic Framework alignment**: The proposed development is considered to meet the intent of the Townsville City Plan. Comprehensive documentation demonstrates that the development is compatible with its zone, maintains amenity, and supports planning scheme outcomes.

This report provides an assessment against all the relevant categorising instruments identified under section 45(3) of the Planning Act. From this assessment, it has been determined that the proposed development complies with, or can be conditioned to comply with, all relevant assessment benchmarks and should therefore be approved.

In view of the above information and the assessment carried out within this application, we recommend that the proposed development is approved, subject to reasonable and relevant conditions.