

From: "No Reply" <mydas-notifications-prod2@qld.gov.au>
Sent: Tue, 17 Dec 2024 15:42:28 +1000
To: "enquire@bncplanning.com.au" <enquire@bncplanning.com.au>
Cc: "Helena.Xu@dsdilgp.qld.gov.au" <Helena.Xu@dsdilgp.qld.gov.au>;
"Development Assessment" <developmentassessment@townsville.qld.gov.au>
Subject: 2411-43466 SRA application correspondence
Attachments: 2411-43466 SRA - GE77-N Advice notice.pdf
Importance: Normal

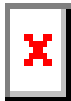
This Message Is From an External Sender

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 [2411-43466 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-1224-0022-4906

SARA reference: 2411-43466 SRA
Applicant reference: DA041-24
Council reference: MCU24/0108 & RAL24/0067

17 December 2024

MCK TSV Pty Ltd
C/- BNC Planning
PO Box 5493
TOWNSVILLE QLD 4810
enquire@bncplanning.com.au

Attention: Mr Benjamin Collings

Dear Mr Collings

SARA advice notice—1 Racecourse Road, Cluden

(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 (SDAP).

In addition to the information request issued on [insert date of IR] and the [phone conversation/email/meeting with you] on [insert date(s)], the following issue(s) with the proposed development have been identified:

Traffic Impact Assessment	
1.	<p><u>Issue:</u></p> <p>The Traffic Impact Assessment (TIA) prepared by Geleon, dated 20 September 2024, reference 50890-RP02-A, does not clearly demonstrate that the proposed development can comply with PO15 – PO17 and PO25 – PO27 of State code 1: Development in a state-controlled road environment (State code 1) along with PO1-PO3 of State code 6: Protection of state transport networks (State code 6). A detailed assessment of SARA's concerns has been provided below.</p> <p>Access</p> <ul style="list-style-type: none">• The TIA states that all internal roads will be accessed via an internal four-way roundabout; however, the development plans include three separate T-intersections along a 'New Road' extending from Lakeside Drive.• The proposed development plans include 3 direct access driveways to Stuart Drive.

However, no review / justification has been included within the report to support these driveways.

- It is unclear how the Townsville Turf Club and 'Future Development Site 1' will be accessed.

Traffic Generation Rate

- Initial Distribution:
 - o The traffic distribution has reportedly been based solely on the existing survey data. This is not considered appropriate noting the low volumes of traffic generated by the existing development over the subject site and that development generated traffic will likely be new trips to network. Further, it results in major inconsistencies, such as ~90% of all inbound traffic arriving from the north along Lakeside Drive and only ~25% travelling north outbound.
- Background Traffic Distribution Post Connection to Stuart Drive:
 - o The background traffic volumes have been redistributed to account for a new connection between Lakeside Drive and Stuart Drive that allows for a “rat-run” through the site between the two (2) state-controlled roads.
 - o It is unclear how the percentage of traffic being distributed has been determined and if it is considered representative of the expected traffic conditions.
 - o It is recommended that all assumptions are outlined and justified as part of the traffic redistribution. This should include reasoning to support the adopted percentages of traffic being redistributed.
- Development Traffic Redistribution Post Connection to Stuart Drive:
 - o The development traffic has been redistributed to account for the new connection from Stuart Drive. This results in significant changes in the reported traffic catchment, such as the volume of traffic arriving from the north on Lakeside Drive decreases from ~90% to ~60%
 - o It is unclear how this 90% northern catchment has reduced to now have ~30% arrive from the south.
 - o It is recommended that the redistribution is amended to retain similar development catchments as the original traffic distribution (pre connection to Stuart Drive)

Scoping Assessment

- A 5% scoping assessment has reportedly been undertaken in accordance with the GTIA, however, it has not been included in the TIA.
- Based on the assumed development traffic volumes and distributions, the adopted impact assessment area may require further intersections noting that ~90% of traffic was assumed to arrive from the state-controlled Lakeside Drive / Darcy Drive intersection.
- However, noting that the adopted traffic distribution is required to be amended, it is recommended that a 5% scoping assessment is undertaken to determine the impact assessment area based on the updated distribution.

Delay Assessment

- A 5% delay assessment excluding the extension of Lakeside Drive was undertaken, which identified significant (>5%) delay impacts. As part of the mitigation measures, a new connection has been provided to Stuart Drive, which required the external traffic to be

redistributed. However, an amended 5% delay assessment has not been undertaken demonstrating the proposed development will result in >5% delay impacts. As such, it is recommended that a delay assessment is undertaken considering the mitigation measures to demonstrate the net delay impacts.

- It is expected that the following new access intersections would be excluded from the delay assessment as they do not have a background intersection configuration / delay to compare against and instead would need to demonstrate operation for the year of opening and 10-year design horizon:
 - o Stuart Drive / Edison Street / Site Access roundabout
 - o Lakeside Drive / Precinct 1-3 access road roundabout.

Safety Risk Assessment

- In line with the abovementioned changes, the existing safety risk assessment will need to be updated.

Action:

You are advised to prepare an amended RPEQ certified TIA in accordance with DTMR's GTIA, which:

- Confirms the proposed ownership of the extension of Lakeside Drive. Will this be a public road or remain a private driveway?
- Confirms how the existing Townsville Turf Club will be accessed as part of the development.
- Includes concepts of the proposed accesses, with all accesses to / in the vicinity of the state-controlled network being reviewed considering the following:
 - o proposed configurations
 - o available sightlines
 - o turn warrants Assessments (if necessary)
 - o location / separation
 - o swept path diagrams of the largest design vehicle.
- Includes a review to demonstrate the internal configurations will not result in impacts to the state-controlled network via queuing or re-circulating vehicles. It is anticipated that significant internal changes will be required with the removal of the Stuart Drive driveways.
- Adopts amended traffic generation rates or provides suitable justification and sources to support the adopted rates. In accordance with the section on the Traffic Generation Rate above, the following rates require further review:
 - o Fast food outlet
 - o Tavern
 - o Multiple Dwelling
 - o Showroom
 - o Water Park / Amusement Park
 - o Hotel
 - o Function Facility.
- Amend the initial (pre connection to Stuart Drive) traffic directional distribution to reflect the

	<p>surrounding traffic volumes, trip generators, residential areas, etc. Alternatively, justification should be provided to support the existing distribution.</p> <ul style="list-style-type: none"> • Provide all assumptions and justification as part of the background traffic redistribution post Stuart Drive connection. This should include reasoning to support the adopted percentages of traffic being redistributed and redistributed routes. • Amend the post Stuart Drive connection development generated distribution to retain similar development catchments as the original traffic distribution (pre connection to Stuart Drive). • Undertake a 5% scoping assessment to determine the expected impact assessment area. Based on the current distribution, this is expected to also include the Lakeside Drive / D'Arcy Drive intersection at a minimum. If traffic is proposed to be re-distributed an amended 5% scoping assessment should be undertaken to determine the impact assessment area of the redistributed traffic volumes. • Undertake an amended 5% delay impact and if required, identifies appropriate mitigation measures. If mitigation measures are provided, a second 5% delay assessment should be undertaken to demonstrate the development impacts are below 5%. As part of any mitigation measures proposed (if required), a suitable concept should be provided demonstrating the changes and that the largest design vehicles can still suitably manoeuvre through the intersection • Provide an amended safety risk assessment reflecting the abovementioned changes to the assessment criteria. The safety risk assessment should also provide a comparison of the identified risk during the background and development scenarios to demonstrate a no net worsening outcome as a result of the proposed development. This should include (but is not limited to): <ul style="list-style-type: none"> o A review of intensified turning movements on the State-controlled network o A review of intensified queuing within the impact area o Consideration of intensified movements / queueing as part of the Lakeside Drive extension.
Impact on Urban Bus Services	
2.	<p><u>Issue:</u></p> <p>Section 5.1 and Appendix F of the TIA indicates that the upgrades to the Stuart Drive/Edison Street/Lakeside Drive roundabout are likely to impact on existing urban bus stop pair, 'Stuart Dr at Edison St, Cluden' (ID: 890681 and 890388) and urban bus routes.</p> <p>Additionally, the Masterplan and Masterplan Bubble Diagram indicate that potential vehicle access for the proposed car parks on Stuart Drive may potentially impact on urban bus stop pair, 'Stuart Dr at Watt St, Cluden' (ID:890389 and 890297).</p> <p><u>Action:</u></p> <p>You are advised to provide revised RPEQ certified traffic engineering information and revised proposal plans showing:</p> <ul style="list-style-type: none"> • the existing urban bus stops along the Stuart Drive frontage of proposed Lot 1 • a concept design for the upgrade of the Stuart Drive/Edison Street/Lakeside Drive roundabout • all proposed vehicle access points for the proposed development along Stuart Drive in relation to the proposed car parking and bus circulation areas • the impact of the proposed roadworks and vehicle crossovers on the existing bus stops (bus

	<p>zones/indented bus bays and bus stop infrastructure).</p> <p>The applicant should demonstrate that existing bus stops will be retained, or where this is not possible and practical, that they will be relocated and reinstated in accordance with Chapter 5 - Bus Stop Infrastructure of the <i>Public Transport Infrastructure Manual 2015</i>, and the <i>Transport Operations (Road Use Management – Road Rules) Regulation 2009</i>, in particular stopping at intersections. Any relocation of the bus stops should not compromise Translink's networking requirements with consideration given to the planning and design of bus stops in Section 5.5 - Bus Stop Environment of Chapter 5 - Bus Stop Infrastructure of the <i>Public Transport Infrastructure Manual 2015</i>.</p> <p>The Department of Transport and Main Roads' TransLink <i>Public Transport Infrastructure Manual 2015</i> is available at: http://translink.com.au/about-translink/reports-and-publications.</p> <p>Roadworks on Stuart Drive will need to be in accordance with the standards set out in Acceptable outcome (AO) AO29.1 – AOP29.3 of PO29 for a single unit rigid bus of 12.5m in length.</p> <p>Advice is provided that the existing bus stop pair, 'Stuart Dr at Edison St, Cluden' (ID: 890681 and 890388) will be required to be upgraded to a Premium stop standard due to the demand generated by the development.</p>
Short-term accommodation – Public Passenger Transport Demand	
3.	<p><u>Issue:</u></p> <p>The application does not demonstrate compliance with PO26 – PO29 and PO32-PO34 of State code 6. The proposed Short-term accommodation (highrise hotel) will have 209 suites initially (potentially 418+ people). There is potential for the hotel to expand by an extra 72 or 196 rooms (up to 810 people in total). This will generate demand for setdown facilities to be provided for private/chartered buses/coaches, mini-buses and shuttles. Additionally, the short-term accommodation use will generate a relatively high demand for the setdown of taxis and booked hire services such as rideshare. Despite this the Masterplan and Masterplan Bubble Diagram only show a VIP drop-off of limited capacity for the Beachclub VIP area.</p> <p><u>Action:</u></p> <p>You are advised to provide revised proposal plans and RPEQ certified traffic engineering information demonstrating the following for the initial and ultimate short-term accommodation use to demonstrate compliance with PO26 – PO29 and PO32-PO34 of State code 6:</p> <p>(i) <i>Bus Setdown</i></p> <ul style="list-style-type: none"> a dedicated bus setdown facility will be provided parallel to kerb with adequate capacity for the parking of private/chartered coaches, buses, shuttles and mini-buses. It is recommended that the bus setdown facility cater for at least 1 x single unit rigid bus of 14.5m in length for the initial hotel as this will also allow for the concurrent parking of 2 x mini-buses. However, additional bus setdown capacity is likely to be required for the ultimate hotel expansion. the maximum design vehicle can manoeuvre into and out of the bus zone, pull up parallel to kerb moving in a forward direction at all times and that the maximum design vehicle can pass a coach/bus parked in the bus zone. This should be demonstrated through a RPEQ certified swept path analysis. The maximum design vehicle for a private/chartered coach/bus should be a single unit rigid bus of 14.5m in length.

	<ul style="list-style-type: none"> the bus setdown facility will be separate from passenger loading zones for taxis, rideshare and private vehicles and service vehicle loading zones to avoid conflict between vehicle types. safe, direct, convenient and inclusive pedestrian access will be provided between the bus setdown facility and the pedestrian entry to the development. Preferably the bus setdown facility should be provided parallel to kerb at the entry to the development. Pedestrian crossing arrangements should be at the start (before) or end (after) of the bus zone and have adequate separation from it to allow for sightlines for pedestrians and vehicles. should bus lay-by parking be required for when buses have to wait or park on-site, that suitable provision for bus parking will be provided outside the porte cochere and bus setdown facility. <p><i>(ii) Taxis and Rideshare</i></p> <ul style="list-style-type: none"> a dedicated passenger loading zone will be provided parallel to the kerb at the entry to the short term accommodation (so that patrons do not cross vehicle circulation areas). the passenger loading zone will have sufficient capacity (the number of parked vehicles that can be accommodated) to cater for the demand generated by the development for private vehicles, taxis and rideshare applications. This should include the initial and ultimate hotel development. the passenger loading zone will include a disability compliant parking bay suitable for a wheelchair accessible taxi. Please refer to AO34.1 and AO34.2 of PO34 of the State Development Assessment Provisions and Chapter 7 – Taxi Facilities of the Public Transport Infrastructure Manual 2015. the maximum design vehicle (including a maxi taxi of 5.38m in length) can enter and exit the passenger loading zone, pull up parallel to kerb and can pass the maximum design vehicle parked in the passenger loading zone. Vehicles within the passenger loading zone should have independent movement. This should be demonstrated through a RPEQ certified swept path analysis. Any pedestrian crossing arrangements should be at the start or end of the passenger loading zone and should not traverse the zone.
Water Theme Park and Beachclub – Public Passenger Transport Demand	
4.	<p><u>Issue:</u></p> <p>The application does not demonstrate compliance with PO26 – PO29 and PO32-PO34 of State code 6. The proposed development relates to a large, multi-faceted water theme park and is expected to form a regional tourist attraction. This will generate demand for the setdown and lay-by of private/chartered buses and coaches for tours, excursions and interest groups. The tourist attraction is also likely to have a relatively high proportion of visitors travelling by personalised passenger transport, namely taxis and rideshare.</p> <p>It is not clear that the waterpark drop-off area shown on the Masterplan and the area for ‘buses’ indicated on this plan and the Masterplan Bubble Diagram will have adequate capacity or a design that is fit for purpose. In particular, a bus setdown facility does not appear to have been provided.</p> <p><u>Action:</u></p> <p>You are advised to provide revised proposal plans and RPEQ certified traffic engineering information to demonstrate the tourist attraction is compliant with PO26 – PO29 and PO32-</p>

PO34 of State code 6. In particular, the following should be addressed:

(i) Bus Setdown

- Provide adequate bus parking capacity (number of bus parking bays) for the demand generated by the development (including events). This should consider bus setdown facilities (parallel to the kerb in a bus zone) and bus lay-by parking for when buses have to wait on the site.
- Provide bus setdown facilities parallel to the kerb at the entrance to the development and with support infrastructure (waiting area with shelter and seats). Otherwise setdown facilities should be connected to the entrance of the development by direct, safe and convenient pedestrian pathways that minimise vehicular/pedestrian conflict.
- Provide bus lay-by parking commensurate with demand. It is anticipated that bus lay-by parking may need to be substantial. Lay-by parking can be provided in a perpendicular or angled arrangement.
- Provide swept paths for the maximum design vehicle which demonstrate that buses can manoeuvre on the site and into and out of bus parking bays, allowing buses to move in a forward direction at all times. Vehicles should be able to pass buses parked in allocated bus parking areas. The maximum design vehicle for a private/chartered coach/bus should be a single unit rigid bus of 14.5m in length, particularly, as the development is likely to cater for interest groups such as school groups and tours.
- Demonstrate that all bus parking zones will be separate from passenger loading zones for taxis, rideshare, private vehicles and loading zones to avoid conflict between vehicle types and maximise safety and efficiency and bus parking capacity.
- Demonstrate an internal bus route that avoids congested car parking areas and aisles and enables an efficient and direct route between the entry and exit of the development.
- Demonstrate bus parking complies with the Disability Standards for Accessible Public Transport 2002 made under subsection 31(1) of the Disability Discrimination Act 1992.

(ii) Taxis

- Demonstrate how taxi facilities with sufficient capacity (number of parking bays) will be provided to cater for the demand generated by the development. This should consider likely passenger volumes and the demand for taxi services given factors such as the gross floor area of the development, use mix, anticipated demand, demographic considerations, and regular uses/activities.
- Demonstrate how taxi facilities will be appropriately positioned to maximise coverage and decrease the distance that potential passengers have to walk. Importantly, taxi services provide an essential form of transport for those who cannot access other forms of transport or drive independently and are completely reliant on taxi services. Taxi facilities should be sited parallel to the kerb at the main entry to the development.
- Demonstrate that taxi facilities will be in accordance with relevant Australian Standards to ensure their safety and operational integrity as well as accessibility to people with a disability. Please refer to AO34.1 and AO34.2 of PO34.
- Provide a RPEQ certified swept path analysis demonstrating that the maximum design vehicle (including a maxi taxi) can enter and exit the taxi rank and has a direct, convenient and priority route through the development.
- Provide adequate transport analysis to verify whether a dedicated taxi rank/zone is

	<p>required.</p> <ul style="list-style-type: none"> Further guidance can be obtained from the Department of Transport and Main Roads TransLink Public Transport Infrastructure Manual 2015 which is available at: http://translink.com.au/about-translink/reports-and-publications. In particular, please refer to Chapter 7 – Taxi Facilities. <p>(iii) <i>Passenger Loading</i></p> <ul style="list-style-type: none"> Demonstrate how the development will provide passenger loading zones for drop-off/pick-up by rideshare, taxis and private vehicles with sufficient capacity to cater for the demand generated by the development. Demonstrate how passenger loading zones will be suitably positioned, in convenient location(s) to cater for this demand. These should be parallel to kerb and adjacent to the main public entrance to the venue. Each passenger loading zone should include a disability compliant parking bay. The position of passenger loading zone/s should allow for a direct and efficient route of travel for rideshare and taxis. Provide a RPEQ certified swept path analysis demonstrating that the maximum design vehicle (including a maxi taxi) can enter and exit the passenger loading zone and can pass vehicles parked in the passenger loading zone.
Stormwater and Flooding	
5.	<p><u>Issue:</u></p> <p>The application does not demonstrate compliance with PO12 – PO16 of State code 2 and PO14-PO16 and PO18 - PO19 of State code 6. Namely, the proposed development relies on floodwater and stormwater mitigation measures that are still within the assessment process associated with 2311-37917 SRA for Operational work. Information has not yet been provided to SARA to satisfy that the proposed floodwater and stormwater regimes associated with the <i>Engineering Report</i> and the <i>Flood Impact Assessment</i>, both prepared by Northern Consulting Engineers, dated 16/08/2024, document reference BNC0084, revision A, will not result in adverse impacts to the State-controlled transport corridors.</p> <p>In particular:</p> <ul style="list-style-type: none"> The stormwater quantity assessment only modelled impacts in the 1% and 20% AEP events. Given the strategic importance of the racecourse for stormwater and flood management for the local area and the proximity of the site to the railway corridor, further modelling is required to ensure no worsening across all potential flood events; The Flood Impact Assessment has addressed afflux and velocity impacts but has not considered the time of submergence. Given the railway corridor is already flood prone, the potential for prolonged submergence due to increased runoff from the development is critical to evaluate; and The staging and timing of mitigation works is unclear, both are crucial to ensuring no worsening occurs during all phases of development. <p><u>Action:</u></p> <p>You are advised to provide a revised Flood Impact Assessment and revised Engineering Report.</p> <p>The revised Flood Impact Assessment and Engineering Report should demonstrate that the</p>

	<p>management of stormwater and flooding post development can achieve a no worsening impact (on the pre-development condition) for all flood and stormwater events that exist prior to development and up to a 1% Annual Exceedance Probability (AEP). This should include at least the following flood and stormwater events: 63.2%, 50%, 20%, 10%, 5%, 2% and 1% AEP. Stormwater management for the proposed development must ensure no worsening to the railway corridor, including rail transport infrastructure, caused by peak discharges, flow velocities, water quality, sedimentation and scour effects. The report should also demonstrate that flood storage capacity is maintained on the site with the development. Overland flow paths/ hydraulic conveyance should be maintained on the site as part of the proposed development. The flood immunity of the railway corridor should not be worsened.</p> <p>In particular, the following should be addressed:</p> <p>(a) <i>Revised water quantity assessment</i> – Provide updated peak discharge analysis modelling for the pre and post development stormwater discharge for the following flood and stormwater events: 63.2%, 50%, 20%, 10%, 5%, 2% and 1% AEP. The design flood peak discharges should be shown for the mitigated case to demonstrate there is no worsening impact on the railway corridor.</p> <p>(b) <i>Revised flood impact assessment</i>. Provide an updated hydraulic and hydrological analysis demonstrating the proposed development will not materially worsen the existing time of submergence for the railway corridor (<i>NB: the top of formation is the control point for this assessment</i>). The updated assessment should also address the following:</p> <ul style="list-style-type: none"> o The design flood peak discharges for the site and surrounding area which exist in the pre and post development scenarios for at least the following flood and stormwater events: 63.2%, 50%, 20%, 10%, 5%, 2% and 1% AEP. o The flood model needs to adequately encompass the railway corridor. o Mapping (afflux, water level/depth and velocity impact maps and time of submergence) should be provided to clearly illustrate the pre-development scenario, and the post development impacts for the above design events. o Any staging of the proposed works and mitigation measures should be clearly detailed and explicitly analysed to ensure there is no worsening during all phases of development for the above design events.
Proposed Allotment Layout Plan	
6.	<p><u>Issue:</u></p> <p>In accordance with the abovementioned concerns with the proposed development and accompanying reports, amendments to the 'Plan of Development – Precinct Plan' that informs the 'Townsville Waterpark, Hotel and Beachclub Plan of Development' are required to demonstrate compliance with State Code 1, 2 and 6 of the State Development Assessment Provisions.</p> <p><u>Action:</u></p> <p>Provide an amended development plan in accordance with abovementioned items, including:</p> <ul style="list-style-type: none"> • Illustrate the full extent of the property boundaries of Lot 1, fully showing the boundaries of each 'precinct'. • Demonstrate how the proposed boundary realignment and plan of development will ensure that the access to the Townsville Turf Club will be maintained. • Remove the additional accesses along Stuart Drive and demonstrate how 'Future

	<p>Development Site 1' will retain access internally for future development.</p> <ul style="list-style-type: none"> Remove the three (3) T-intersections from the plan and replace with the 4-way roundabout along the extension of Lakeside Drive, as detailed in the Traffic Impact Assessment prepared by Geleon. Update the plan in accordance with any mitigation methods recommended within an updated Traffic Impact Assessment. Include dedicated and separated bus setdown and taxi/rideshare loading zones.
Additional advice	
7.	<p>The applicant is advised that:</p> <ul style="list-style-type: none"> One consolidated bus lay-by parking area is able to be provided for all uses triggering this demand, although buses will need to be able to safely and efficiently re-circulate to the bus setdown facilities and vice versa. If one strategically located bus setdown facility is to be provided, this must be convenient to all the venue entries (waterpark, beachclub and short-term accommodation) and have sufficient capacity (number of buses that can concurrently park) to cater for the setdown demand of the uses combined. This should consider the initial and ultimate hotel development. Setdown facilities for personalised public passenger transport (taxis and rideshare) should be provided directly adjacent to the entry of each of the uses as these are likely to cater to vulnerable people who find it difficult to walk a distance (elderly, children, persons with a disability) and those with luggage, prams and the like. <p>The applicant could consider altering the 'extra hotel carpark 24 cars' shown on the Masterplan to a dedicated parallel to kerb setdown facility to cater for the likely demand as this is strategically placed in proximity to the entries of the venues. Separate zones should be dedicated to buses, taxis and rideshare.</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 March 2025**. If you decide not to respond, your application will be assessed and decided based on the information provided to date.

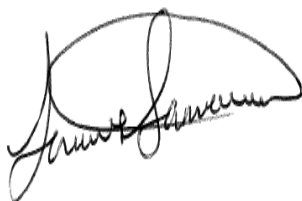
Under the [Development Assessment Rules](#) (DA Rules), the issuing of advice does not stop the assessment timeframes. If you intend to provide additional information, it should be provided in a timely manner to allow sufficient time for the information to be considered. As such, you are strongly encouraged 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 Helena Xu, Senior Planning Officer, on (07) 3452 6724 or via email 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

Development details	
Description:	<div>Development permit</div> <div>Reconfiguring a lot - Boundary realignment</div> <div>Preliminary approval</div> <div>Material change of use - Variation Request to override the planning scheme to facilitate development in accordance with the Townsville Waterpark, Hotel and Beachclub Plan of Development</div>
SARA role:	Referral agency
SARA trigger:	<ul style="list-style-type: none"> 10.8.2.3.1.1 - Development on or adjoining a Queensland heritage place 10.8.2.3.2.1 - Material change of use of premises on a lot adjacent to or containing a Queensland heritage place 10.9.4.1.1.1 - Development impacting on state transport infrastructure 10.9.4.2.1.1 - Reconfiguring a lot near a state transport corridor 10.9.4.2.4.1 - Material change of use of premises near a state transport corridor (Planning Regulation 2017)
SARA reference:	2411-43466 SRA
Assessment criteria:	<div>State code 1: Development in a state-controlled road environment</div> <div>State code 6: Protection of state transport networks</div> <div>State code 14: Queensland heritage</div>