

SARA reference: 2605-52145 SRA
Applicant reference: USC119
Council reference: MCU26/0031

18 May 2026

Kaenetto Investments
C/- Urban Space Consulting
PO BOX 5161
WEST END QLD 4101
urbanspaceconsulting@outlook.com

Attention: Mr William Kruze

Dear Sir/Madam

SARA information request – 177 Francis Street, West End (Townsville City); 179 Francis Street, West End (Townsville City)

(Notice issued under section 12 of the Development Assessment Rules)

SARA has undertaken a preliminary review of the material provided in support of the above referenced application which was deemed properly referred on 6 May 2026.

From this review, SARA has identified a range of matters relating to State code 1: Development in a state-controlled road environment of the State Development Assessment Provisions (SDAP) that it wishes to draw to your attention.

1. Stormwater

In reviewing the application material, it is noted that, under pre-development conditions, stormwater runoff from the site discharges via overland flow toward the southern and western boundaries into existing open drains running parallel to these boundaries. These drains represent the lawful points of discharge (LPDs) and discharge directly into the existing drainage culverts beneath the state-controlled road.

Under post-development conditions, the Engineering Report (ER) (by STP Consultants dated 1 April 2026, reference STP25-1272, revision A) proposes to retain these existing LPDs. It is noted that the site is currently vacant and consists of grassed land. As such, the proposed development will increase the impervious area compared to existing conditions. The ER states that the post-development impervious fraction of the site will be 59%, which is below the allowable threshold of 65% for the Low density residential zone under the Townsville City Plan. As the proposed impervious fraction complies with this limit, the ER concludes that on-site detention is not required.

However, given that the development site abuts the state-controlled road and proposes to discharge post-development stormwater without mitigation to the existing culverts beneath the state-controlled road,

the applicant must demonstrate that the post-development discharges will not result in any worsening impacts on the state-controlled road compared to pre-development conditions.

The SDAP Supporting Guideline for Development in a state-controlled road environment requires a stormwater assessment demonstrating design peak discharges for the site and surrounding area, for both pre- and post-development conditions, across all main storm events (i.e. 63%, 50%, 20%, 10%, 5%, 2%, and 1% AEP).

Response requested:

Please provide a Stormwater Management Plan (SMP) that includes the following:

- a) Identification of all lawful point(s) of discharge (LPDs).
- b) Peak runoff calculations for the above storm events for both pre- and post-development conditions, along with a tabulated comparison of the two scenarios to demonstrate no worsening impact on the state-controlled road. The calculations and comparison are required for each point of discharge.
- c) Where the comparison identifies increased peak flow rates under post-development conditions, appropriate mitigation measures must be proposed. These measures should include detailed design information (e.g. on-site detention volumes and outlet specifications) to ensure peak discharges are equal to or less than pre-development conditions.
- d) Drawings showing catchment areas, contour plans, drainage layouts, and flow path directions for both pre- and post-development conditions.

2. Noise Report

In reviewing the Acoustic Report prepared by Acousticworks, dated 25 March 2026 (reference 2026025, revision R01B), it has been identified that the report does not adequately demonstrate compliance with the applicable free-field noise criteria for private open space areas associated with the proposed development.

In particular, the report identifies exceedances of the 60 dB(A) free-field noise criterion within the ground level private open space areas of Units 9, 10 and 11, and the information provided is insufficient to verify compliance across all exclusive use outdoor areas.

Response requested:

Please provide an amended Acoustic Report that addresses the following matters:

- a) Review and validate the monitoring data used within the assessment. In particular, Section 5.2 of the report indicates that a number of monitoring days may have been affected by adverse weather conditions (including rainfall). Any exclusion of data due to adverse weather is to be undertaken in accordance with the requirements of the Transport Noise Management Code of Practice.
- b) Revise the assessment contained in Section 7.3 and Figure 4 (of the Acoustic Report, prepared by Acousticworks, dated 25 March 2026) to address the predicted exceedances of the 60 dB(A) free-field noise criterion within the ground level private open space areas of Units 9, 10 and 11.
- c) Provide revised noise contour plots that clearly identify the 60 dB(A) free-field noise contour line, as the current contour plots do not enable clear verification of compliance with the applicable criterion.
- d) Provide detailed and zoomed-in noise contour plots for Units 9, 10 and 11, including any proposed acoustic mitigation measures such as noise barriers, to clearly demonstrate compliance with the 60 dB(A) free-field noise criterion across all private open space areas.
- e) Demonstrate that all areas intended for the exclusive use of residents, including yards and landscaped areas associated with the proposed units, comply with the applicable free-field noise criterion.

How to Respond

In accordance with section 13 of the Development Assessment Rules (DA Rules), you have three months to respond to this Information Request. The due date of a response to SARA is **18 August 2026**.

You can choose to respond to all, some, or none of the matters raised in this notice.

If you decide not to respond to the matters raised, SARA will finalise its assessment on the material provided to date in support of the application.

It would be appreciated if you would provide your response to SARA 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, North and North-West Queensland, on 4747 3907 or via email NQSARA@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Kellie Galletta
Principal Planning Officer, North and North-West Queensland

cc Townsville City Council, developmentassessment@townsville.qld.gov.au