

Our Reference: 23.064  
TCC Reference: MCU26/0016  
HF

13 April 2026

Assessment Manager  
Townsville City Council  
PO Box 1268  
TOWNSVILLE QLD 4810

Via email: [jake.kidner@townsville.qld.gov.au](mailto:jake.kidner@townsville.qld.gov.au)

## **Attention: Planning and Development – Jake Kidner**

Dear Jake,

### **Response to Information Request Development Application for Material Change of Use – Tourist Park 772 Black River Road, Black River and formally identified as Lot 24 on SP305779**

Northpoint Planning acts on behalf of the applicant, R. MacElroy, in relation to the abovementioned development application. We refer to the Information Request issued by Townsville City Council on 31 March 2026 (refer **Attachment 1**).

The information contained within this correspondence constitutes the Applicant's full response to the Information Request.

### **Response to Information Request**

The Information Request included one (1) request item. In response, please refer to Table 1 below.

#### **Table 1 – Response to Information Request**

##### **Request Item 1 – Low Impact Traffic Assessment**

This item requires the Applicant to provide a Low Impact Traffic Impact Assessment Report, prepared by a suitably qualified Registered Professional Engineer of Queensland (RPEQ), in accordance with SC6.4.5.2 – Traffic Impact Assessments (TIA).

In response to this item, please refer to the Low Impact Traffic Impact Assessment provided at **Attachment 2**.

### **Proceeding**

We trust the information provided is sufficient for Council to continue its assessment of the application. We look forward to receiving Council's draft conditions in due course.



We welcome the opportunity to discuss the application further should any additional clarification or information be required. Please do not hesitate to contact the undersigned should you have any queries.

Yours faithfully,

**Hannah Flynn**

Town Planner

**Northpoint Planning**

Attachment 1 – TCC Information Request

Attachment 2 – TIA



# Attachment 1



31 March 2026

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Dear Sir/Madam

## Information Request

### *Planning Act 2016*

As per our telephone conversation on 31 March 2026 please be advised that, upon review of the below mentioned development application, further information is required to undertake a comprehensive assessment. In accordance with section 12 of Development Assessment Rules under the *Planning Act 2016* the following information is requested.

#### Application Details

---

Application no:	MCU26/0016
Assessment no:	10303058
Proposal:	Tourist Park - Expansion of Existing Site - Stage 2
Street address:	772 Black River Road BLACK RIVER QLD 4818
Real property description:	Lot 24 SP 305779
Applicant's reference:	NP23.064

---

The information requested is set out below >>

#### Request Item 1 - Low-Impact Traffic Impact Assessment

The applicant is requested to provide a low-impact traffic impact assessment report, prepared by a suitable qualified Registered Professional Engineer of Queensland (RPEQ), in accordance with SC6.4.5.2 Traffic impact assessments (TIA).

The traffic impact assessment report must:

- Address site access safety including adequate sight line clearances and impacts on existing traffic facilities such as heavy vehicle turning paths.
- Confirm that sufficient queuing capacity is provided at the site access in accordance with the RTA's Guide to Traffic Generating Developments.
- Consider and recommend a Basic Right Turn Treatment (shoulder widening opposite the access point), as this represents the typical AUSTRROADS minimum standard.

#### Reason

To demonstrate compliance with Part 9.3.5 Transport impact, access and parking code, and Part 9.3.6 Works code of the Townsville City Plan.

### Advice

The applicant is advised that the additional 55 sites will increase the traffic significantly from the approved 19 sites. A traffic impact assessment report will confirm that the direct access to Black River Road is safe with the increased traffic noting that Black River Road is a two-lane high speed road.

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### End of Information Request >>

Under the provisions of the Development Assessment Rules under the *Planning Act 2016*, you have three options available in response to this Information Request. You may give the assessment manager (in this instance Council):

- (a) all of the information requested; **or**
- (b) part of the information requested; **or**
- (c) a notice that none of the information will be provided.

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If you have any further queries in relation to the above, please do not hesitate to contact Jake Kidner on telephone 07 4417 5240, or email [developmentassessment@townsville.qld.gov.au](mailto:developmentassessment@townsville.qld.gov.au).

Yours faithfully



**For Assessment Manager**  
Planning and Development



# Attachment 2

# TRAFFIC IMPACT ASSESSMENT

772 BLACK RIVER ROAD BLACK RIVER

APRIL 10, 2026

JAIDEN PATEL TRAFFIC CONSULTING

## Version History

Issue	Date	Description	Prepared By	Approved By
1.0	10 April 2026	Initial Issue	Jaiden Patel	Jaiden Patel   RPEQ #33098

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- Attachment 1:** Council Information Request
- Attachment 2:** Swept Path Diagrams

# 1 Introduction

## 1.1 Background

Jaiden Patel Traffic Consulting Pty Ltd has been engaged by Erlmac Holdings Pty Ltd to prepare a low-impact traffic impact assessment for an Expansion of Existing Site (Tourist Park) at 772 Black River Road, Black River (subject site). The subject site is located in the City of Townsville local government area, approximately 22 km west of Townsville City. It is understood that the subject site currently operates as a Caravan Park.

Figure 1 illustrates the location of the subject site with respect to the surrounding road network.



**Figure 1:** Subject Site Location

## 1.2 Development overview

The proposed development details are summarised below:

- The subject site is formally described as Lot 24 on SP305779, located at 772 Black River Road, Black River, comprising approximately 232,900 m<sup>2</sup> within the Townsville City Council Local Government Area
- The subject site is currently approved as a 15-site caravan park, and the development application seeks to add 55 additional sites across two (2) stages
- Vehicular access is via an existing private access road connecting to the Council-controlled Black River Road. No new access points are proposed
- The largest vehicles serviced by the caravan park are 18 m car-and-caravan combinations and 19 m articulated vehicles

### 1.3 Information request details

Council's Information Request is summarised as follows:

- On 31 March 2026 City of Townsville issued an Information Request in relation to application MCU26/0016 for Tourist Park - Expansion of Existing Site - Stage 2 at 772 Black River Road, Black River QLD 4818
- One (1) item was included in the Information Request for a low-impact traffic impact assessment report, prepared by a suitable qualified Registered Professional Engineer of Queensland (RPEQ), in accordance with SC6.4.5.2 Traffic impact assessments (TIA).
- It was stated that the traffic impact assessment report must:
  - Address site access safety including adequate sight line clearances and impacts on existing traffic facilities such as heavy vehicle turning paths.
  - Confirm that sufficient queuing capacity is provided at the site access in accordance with the RTA's Guide to Traffic Generating Developments.
  - Consider and recommend a Basic Right Turn Treatment (shoulder widening opposite the access point), as this represents the typical AUSTRROADS minimum standard.
- The reason for the request is to demonstrate compliance with Part 9.3.5 Transport impact, access and parking code, and Part 9.3.6 Works code of the Townsville City Plan.

A copy of Council's Information Request is included at Attachment 1.

### 1.4 Scope of work

The scope of this traffic impact assessment included the following tasks:

- Reviewing the existing road network information for Black River Road, including hierarchy, speed environment, geometry and crash history,
- Estimating and assessing the development's peak traffic generation, noting an increase in yield from 1, to 70 sites
- Reviewing and confirming suitability of access arrangements, including on-site queuing, sight distance, turn warrants, and design vehicles
- Undertaking a qualitative assessment of the traffic safety and efficiency impacts arising from the proposed development
- Identification of any safety or operational mitigation measures required to support the development (if any)

## 2 Existing conditions

### 2.1 Road network

A review of Black River Road was undertaken with relevant information summarised in Table 1.

**Table 1:** Road Network Information

Road Name	Asset Owner	Hierarchy	Speed Limit	Geometry
Black River Road	Council	Arterial (rural)	100 km/h	Flat, straight with occasional gentle curved, open view

In summary, Black River Road is generally flat and straight with occasional gentle curves, good forward visibility, and no notable constraints affecting safety or performance in proximity to the subject site.

## 2.2 Crash history

A review of publicly available crash data for the most recent ten (10) years was undertaken for Black River Road in the vicinity of the subject site to identify any crash trends associated with the existing access. While the area of influence for a property access with very low turning movements on a low-volume rural arterial is limited, the review was conservatively extended to 500 m upstream and downstream of the access; no crashes were identified within this area.

In summary, there are no crashes in proximity to the subject site's access on Black River Road.

# 3 Development traffic

## 3.1 Site-specific considerations

The following site-specific considerations are relevant to the subject site's traffic generation and operational characteristics:

- The majority of occupants are long-term residents (typically retirees), who generate infrequent daily vehicle movements
- Long-term occupants generally do not commute daily to and from the subject site
- Short-term occupants are predominantly workers associated with nearby employment areas
- Worker-related arrivals and departures typically occur outside the network peak periods

In summary, these factors result in low and highly dispersed daily traffic demand, with little to no concentration during peak periods.

## 3.2 Background traffic

Current background traffic data was sourced from the *TCC Traffic Calibration Model 2025* and is summarised in Table 2.

**Table 2:** Background Traffic Volumes

Road Name	ID	Direction	Daily	AM Peak	PM Peak	% HV
Black River Road	10708	Northbound	55	10 vph	6 vph	24%
	4011	Southbound	57	6 vph	6 vph	19%

In summary, the traffic volumes on Black River Road are very low.

## 3.3 Development traffic

### 3.3.1 Trip generation rate

Trip generation for caravan parks is not well documented, with specific trip generation rates not identified in:

- Council's Townsville Road & Pathway Demand Rates Planning Report,
- Council's TIA Guidelines Appendix D (Summarising TDB), and

- the NSW Guide to Traffic Generating Developments.

Given the absence of directly applicable published rates, trip generation has been estimated based on the site-specific considerations outlined in Section 3.1, having regard to the predominance of long-term occupants, low turnover, and the rural context of the development.

The assessment approach is consistent with the Austroads Guide to Traffic Management Part 12, which identifies that the scope and complexity of assessment should reflect the scale of traffic demand and the extent of likely impacts. Accordingly, a simplified and conservative traffic generation approach has been adopted.

The adopted daily and peak hour trip generation rates are summarised in Table 3.

**Table 3:** Trip Generation Rates

Land Use	AM Peak	PM Peak	Daily	Unit
Rural Caravan Park	0.1	0.1	1	trips / site

These trip generation rates reflect the observed travel behaviour of occupants, noting advice from the caravan park operator that residents do not leave the site on a daily basis and commonly remain on site for several consecutive days without generating vehicle movements. On this basis, an average daily traffic rate of 1.0 trip per site is considered conservative when averaged over time. Peak hour rates have been retained at a conservative level to ensure that access performance and safety are robustly assessed.

### 3.3.2 Trip generation

Trip generation for the proposed development has been calculated for both the number of existing approved sites (15), and proposed increase for which approval is being sought (55).

Table 4 summarises the daily and peak hour development trip generation.

**Table 4:** Trip Generation

Land Use	Approval	Sites	AM Peak Trips	PM Peak Trips	Daily Trips
Rural Caravan Park	Total	70	7	7	70
	(-) Existing	15	1.5	1.5	15
	<b>Proposed</b>	<b>55</b>	<b>6</b>	<b>6</b>	<b>55</b>

In summary, the proposed trip generation by the subject site is considered very low in both the AM and PM peaks, and daily.

### 3.3.3 Directional split

The adopted directional split reflects the predominance of outbound movements in the AM period and inbound movements in the PM period, consistent with typical residential and worker accommodation travel behaviour.

Table 5 summarises the adopted directional split of the development traffic based on generally accepted traffic engineering practice.

**Table 5:** Directional Split

Land Use	AM Peak		PM Peak	
	In	Out	In	Out
Rural Caravan Park	20%	80%	60%	40%

### 3.3.4 Traffic distribution

Table 6 summarises the assumed traffic distribution for the subject site based on the navigational routes to areas within the general Townsville area, as well as by considering the current equal northbound and southbound trip distribution in traffic data (see Table 2).

**Table 6:** Traffic Distribution

Direction	Proportion
East	50%
West	50%

### 3.3.5 Peak development traffic

Peak development traffic has been calculated in detail to demonstrate the limited number of turning movements associated with the proposed development.

Table 7 summarises the peak hour development traffic by direction.

**Table 7:** Peak Hour Development Traffic by Direction

AM Peak Trips					PM Peak Trips					Daily Trips
Left		Right		Total	Left		Right		Total	Total
In	Out	In	Out		In	Out	In	Out		
1	3	1	3	7	2	1	2	1	7	70

In summary, while the development represents an increase in the number of approved sites, the resulting traffic increase remains small in absolute terms, with peak-hour traffic increasing by approximately seven (7) vehicle movements in both the AM and PM peaks, which is operationally negligible on Black River Road.

## 4 Access and queuing

### 4.1 Access

#### 4.1.1 Overview

Vehicular access to the subject site is provided via an existing gravel private access connecting directly to the Council-controlled Black River Road. No new access points are proposed as part of the development.

Black River Road is a rural arterial road in a 100 km/h speed environment carrying very low traffic volumes. As outlined in Section 3, the development is expected to generate limited additional traffic, with a maximum of seven (7) vehicle movements in each of the AM and PM peak periods. Given these very low

volumes, access demand is minimal and vehicle interactions with through traffic on Black River Road will be infrequent.

Based on the scale of traffic generation and the nature of the access movements, the existing access arrangement is considered appropriate for the proposed development, subject to confirmation of sight distance and turn treatment requirements.

Figure 2 illustrates the proposed access location on Black River Road.



**Figure 2:** Proposed Site Access Location

#### 4.1.2 Sight distance

Sight distances at the existing site access on Black River Road have been checked against the Austroads Guide to Road Design (AGRD) Part 4A. It is noted that Black River Road in the vicinity of the access is generally flat and straight with an open rural roadside environment, providing excellent visibility in both directions.

The alignment and surrounding environment do not present any horizontal or vertical constraints that would materially limit a driver’s ability to observe approaching vehicles on Black River Road when entering and exiting the site. Similarly, drivers travelling along Black River Road have clear visibility of vehicles entering or exiting the site.

Table 8 summarises access sight distance compliance against the Safe Intersection Sight Distance (SISD) requirements from the AGRD.

**Table 8:** Access Sight Distance Assessment

Road	Direction	Design Speed	AGRD SISD Requirement	Available	Compliance
Black River Road	East	110 km/h	285 m	> 300 m	Compliant
	West			> 300 m	Compliant

In summary, sight distances at the proposed access location are compliant with Austroads desirable distances for SISD.

#### 4.1.3 Design vehicle

The design vehicles adopted for assessment of the site access reflect the largest vehicles reasonably expected to access the caravan park in normal operation as both customers and service vehicles. Based on discussions with the operator and the operational nature of the development, the relevant design vehicles are as identified in Table 9.

**Table 9:** Design Vehicle Review

Land Use	Typical Design Vehicle	Adopted Design Vehicle	Typical Check Vehicle	Adopted Check Vehicle	Compliance
Rural Caravan Park	Car-Caravan Combination	Car-Caravan Combination (18 m)	HRV / Bus (12.5 m)	Articulated Vehicle (19 m)	Compliant

Swept path diagrams for the adopted design and check vehicles are provided in Attachment 1. The assessments confirm that both vehicles are able to safely enter and exit the site via the existing access arrangement without encroaching into opposing traffic lanes.

On this basis, the existing access geometry is considered suitable to accommodate the design vehicles associated with the proposed development, and no access widening or geometric modification is required from a traffic engineering perspective.

#### 4.1.4 Turn treatment warrants

As detailed in Section 3, the development is anticipated to generate no more than seven (7) vehicle movements in each of the AM and PM peak periods, with only a small proportion of these movements involving right-turn manoeuvres into or out of the site. Peak hour right-turn volumes are therefore extremely low and would occur as isolated events, rather than representing sustained turning demand.

On this basis, the provision of Basic Left Turn or Basic Right Turn Treatments is not warranted or reasonable, having regard to the combination of:

- very low through traffic volumes on Black River Road,
- very low right-turn demand associated with the site access,
- the absence of any identified safety issues at the location, and
- Basic Left Turn or Basic Right Turn Treatments are not typical of other accesses along Black River Road, including accesses serving land uses with significantly higher heavy-vehicle activity

Turn treatment requirements were also reviewed against the Department of Transport and Main Roads' Road Planning and Design Manual (RPDM) Part 4A, which serves as the Queensland supplement to the Austroads Guide to Road Design Part 4A.

While a Basic Right Turn Treatment is identified as a typical treatment for higher-volume rural intersections, the AGRD and RPDM expressly adopt a context- and volume-based approach, and do not mandate auxiliary turn lanes where turning demand and through traffic volumes are demonstrably low.

When the peak turning demand of seven (7) vehicles per hour is assessed against a background through volume of approximately ten (10) vehicles per hour using Figure A.11(a) for design speeds  $\geq 100$  km/h (see Figure 3), the access operates well within the intended serviceability limits for simple left-turn and simple right-turn movements. Accordingly, no additional turn lane treatments (such as a basic left or basic right turn) are required, and the existing access arrangement is considered appropriate to safely accommodate the expected turning movements without additional infrastructure works from a traffic engineering

perspective. Specifically, provision of a Basic Right Turn Treatment for a peak right-turn demand of approximately two (2) vehicles per hour would represent a disproportionate response to the identified traffic impacts.

Importantly, simple left-turn and simple right-turn treatments are typical of other accesses along Black River Road, including the nearby quarry, which is expected to accommodate significantly larger and more frequent heavy-vehicle movements than those associated with the proposed development. Requiring auxiliary turn treatments for this low-impact development would therefore be inconsistent with existing practice on the same road corridor and unreasonable given the comparatively minor traffic generation of the site.

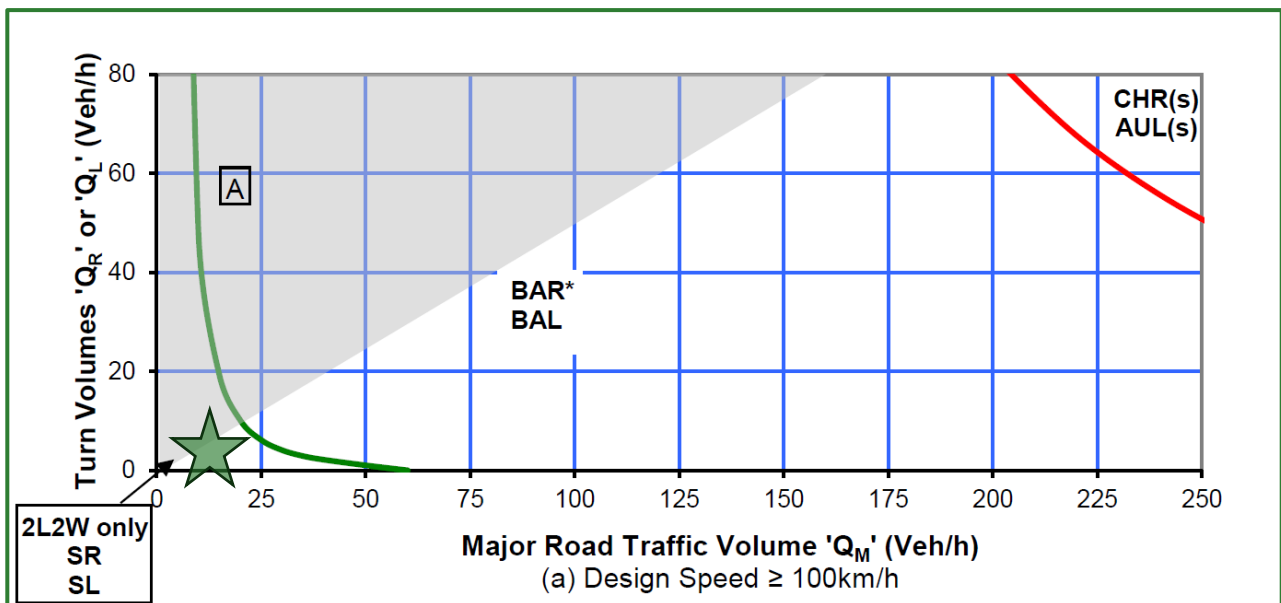


Figure 3: Turn Warrant Assessment (RPDM)

In summary, the very low turning and through traffic volumes mean the access operates safely and comfortably within the thresholds for simple left and simple right turn movements, and no additional turn treatment is warranted.

## 4.2 Queueing

The swept path diagrams in Attachment 1 demonstrate that the access arrangement provides adequate queuing space for 18 m car-and-caravan combinations and 19 m articulated vehicles, which represent the largest vehicles expected to access the site.

Queueing at the site access has been assessed qualitatively based on the very low traffic generation associated with the development. With peak-hour traffic generation limited to seven (7) vehicle movements, the maximum expected queue demand is one (1) vehicle, and the likelihood of two vehicles arriving simultaneously is extremely low.

Importantly, the site gates are ordinarily open, allowing vehicles to enter the site without delay. Queueing would therefore only occur in the unlikely event that the gate has been closed for operational reasons. In that scenario, the access and adjacent shoulder provisions provide sufficient standing space for several vehicles to wait clear of Black River Road, ensuring no obstruction or safety risk to through-traffic.

Consistent with the RTA Guide to Traffic Generating Developments, the access design ensures that the expected maximum queue of one (1) vehicle can be fully contained within the site and will not impact the operation or safety of the adjacent road network.

On this basis, the proposed development provides adequate on-site queuing capacity, and no adverse impacts to the operation or safety of Black River Road are anticipated.

## 5 Mitigation measures

This traffic impact assessment has demonstrated that the proposed expansion of the existing caravan park at the subject site will generate very low levels of additional traffic, with minimal interaction with the surrounding road network. Background traffic volumes on Black River Road are also very low, and the existing access arrangement provides adequate sight distance, accommodates the relevant design vehicles, and operates well within turn treatment warrant thresholds.

Importantly, provision of a Basic Right Turn Treatment for a peak right-turn demand of approximately two (2) vehicles per hour would represent a disproportionate response to the identified traffic impacts.

On this basis, no road network upgrades or access works are required to support the proposed development. The existing access arrangement is considered appropriate to safely and efficiently accommodate the anticipated traffic demand without the need for auxiliary turn lanes, access or shoulder widening, or other infrastructure upgrades.

In summary, from a traffic engineering perspective no specific conditions of approval are recommended in relation to traffic operation, safety or access arrangements.

## 6 Conclusion

### 6.1 Summary of impacts

In summary, the proposed development results in negligible impact to the operation and safety of the surrounding road network.

### 6.2 Compliance statement

This traffic impact assessment has been prepared in accordance with all relevant transport, traffic engineering and planning requirements as applicable to the subject site and proposed development. The analysis, design inputs and recommendations are based on publicly available State and Local Government guidelines. All methodologies, assumptions and design parameters reflect current industry practice and the standards referenced throughout this report.

### 6.3 Recommendations

This Traffic Impact Assessment demonstrates that the proposed development can be supported from a traffic and transport perspective, without conditions relating to access or other transport infrastructure upgrades. The findings are accurate, robust and suitable to inform Council development assessment processes.

# ATTACHMENT 1: COUNCIL INFORMATION REQUEST



31 March 2026

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Dear Sir/Madam

## Information Request

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Application no:	MCU26/0016
Assessment no:	10303058
Proposal:	Tourist Park - Expansion of Existing Site - Stage 2
Street address:	772 Black River Road BLACK RIVER QLD 4818
Real property description:	Lot 24 SP 305779
Applicant's reference:	NP23.064

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### Advice

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If you have any further queries in relation to the above, please do not hesitate to contact Jake Kidner on telephone 07 4417 5240, or email [developmentassessment@townsville.qld.gov.au](mailto:developmentassessment@townsville.qld.gov.au).

Yours faithfully



**For Assessment Manager**  
Planning and Development

## ATTACHMENT 2: SWEEP PATH DIAGRAMS



CLIENT: Erlmac Holdings Pty Ltd

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Rev.	AMENDMENT DESCRIPTION	DATE
A	INITIAL ISSUE	10/04/2026

**SITE ACCESS  
 SWEEP PATH DIAGRAMS  
 CAR TOWING CARAVAN**

SCALE: SCALE 1:500

DRAWN: JAIDEN PATEL | RPEQ 33098

JOB-DRAWING No. **DWG 1**

REVISION **(A)**



CLIENT: Erlmac Holdings Pty Ltd

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Document Set ID: 28260481  
 Version: 1  
 Date: 10/04/2026  
 APPROVED FOR WRITTEN CONSENT GIVEN

Rev.	AMENDMENT DESCRIPTION	DATE
A	INITIAL ISSUE	10/04/2026

**SITE ACCESS**  
**SWEPT PATH DIAGRAMS**  
**CAR TOWING CARAVAN**

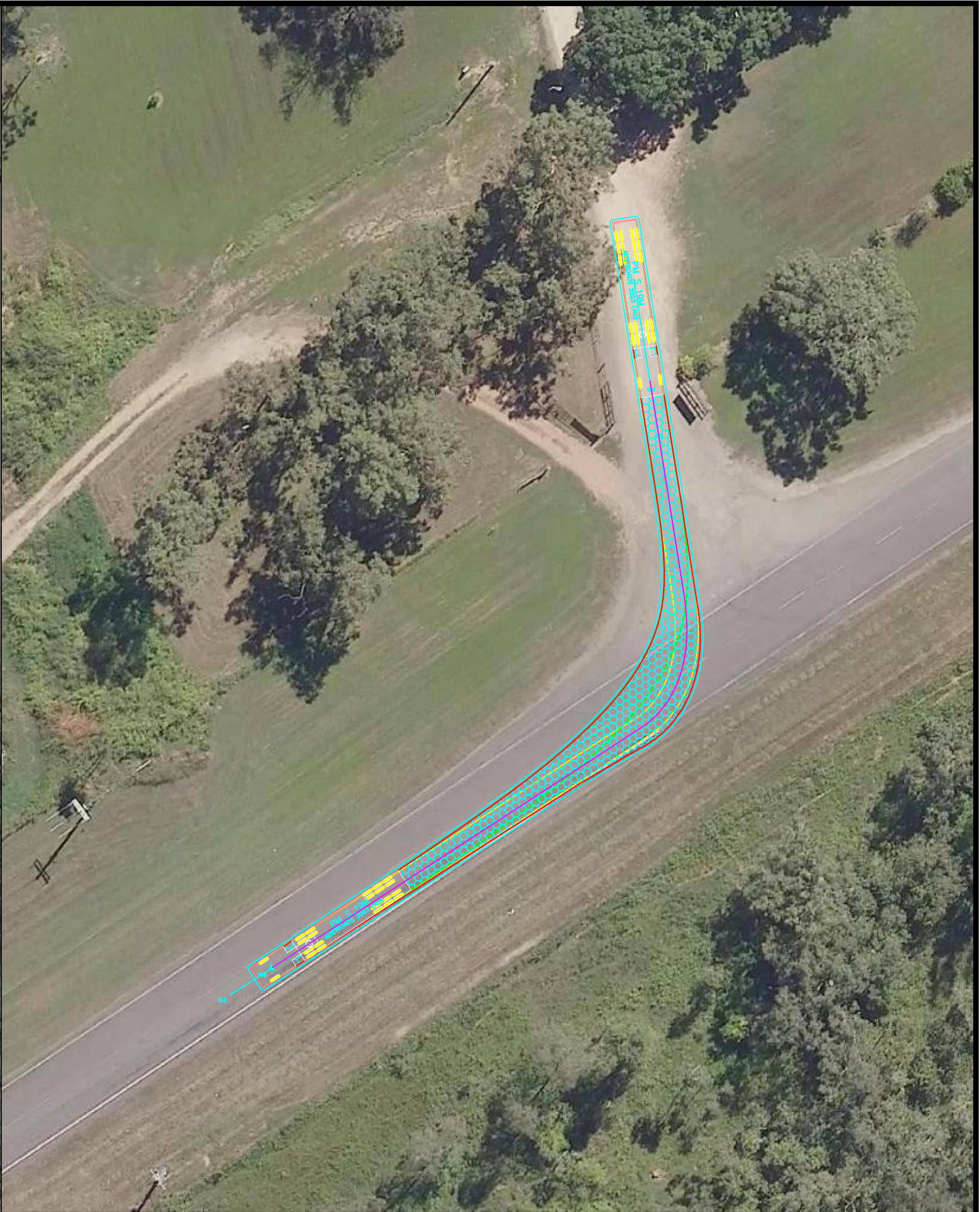
SCALE 1:500

SCALE: 5 0 5 10 15m

DRAWN: JAI DEN PATEL | RPEQ 33098

JOB-DRAWING No. **DWG 2**

REVISION **A**



CLIENT: Erlmac Holdings Pty Ltd

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Document Set ID: 28260481  
 Version Reference Date: 10/04/2026  
 APPROVED FOR CONSENT GIVEN

Rev.	AMENDMENT DESCRIPTION	DATE
A	INITIAL ISSUE	10/04/2026

**SITE ACCESS**  
**SWEPT PATH DIAGRAMS**  
**19 M ARTICULATED VEHICLE**

SCALE: SCALE 1:500

JOB-DRAWING No. **DWG 3**

REVISION **A**

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