



18 June 2026

The Assessment Manager
Townsville City Council
PO Box 1268
Townsville QLD 4810

Attention: Kate Wilkes

Delivery via email: kate.wilkes@townsville.qld.gov.au

Dear Kate,

Response to Information Request – 37 Ingham Road, West End QLD 4810 (Council Ref.: MCU26/0030)

Urbis Ltd continue to act on behalf of *CHPF South Bunbury Pty Ltd* (**the Applicant**) in relation to the abovementioned development application to change the current approval over the site. This correspondence constitutes the Applicant's full response to the information request issued by Council on 12 May 2026 for the development application in accordance with Section 13.2 (a) of the *Development Assessment Rules (DA Rules)*.

This response is accompanied by the following supporting information:

- **Appendix A** – Traffic Impact Statement, prepared by *Traffix*.

Each item from Council's Information Request has been outlined below (*in italics*) along with the respective comments and responses to each item.

Item 1 – Traffic Impact Assessment

A new Traffic Impact Assessment (TIA) report certified by an RPEQ is requested in support of the proposed change. The TIA should utilise up-to-date traffic counts and be prepared in accordance with SC6.4.5.2 Traffic impact assessments (TIA) of the Townsville City Plan. The TIA must identify if any upgrades and/or modifications are required to the external road network to accommodate the additional vehicle movements anticipated to be generated by the proposed change.

Reason

To demonstrate compliance with Performance Outcome PO1 of the Transport, impact, access and parking code.

Advice

- a) The submitted Traffic Impact Statement refers to a previous TIA by Premise (report no. GRI001/R01, revision A dated 15 February 2017), which is over 9 years old at the time of writing. SC6.4.5.2(3)(a)(iv) of the Townsville City Plan states that "any traffic study may also need to be revised if the study is older*

than 2 years and Council determined that the existing conditions have changed enough to invalidate the study results”.

- b) Townsville City Council's Traffic Calibration Model may be used to inform the TIA. The model data can be viewed at the following link: <https://data.gov.au/data/dataset/tcc-traffic-calibration-model-2025>
- c) The proposal would likely trigger the need for a Moderate level TIA report per Table SC6.4.5.2 of the Townsville City Plan.

Response

In the first instance, the Applicant acknowledges Council's concerns on the potential for additional traffic generation resulting from this Other Change application. We understand that consideration to traffic impacts on the broader network is an important aspect of ensuring the development continues to function safely and efficiently within its context.

However, it is noted that the nature of this application in an Other Change and therefore should be assessed in the context of the existing development approval (Council Ref.: M117/0007) (**Original Approval**). The Original Approval was supported by a Traffic Impact Assessment which was endorsed by Council. It is also noted that the previous traffic report calculated traffic generation on the total floor area of the hospital rather than the number of hospital beds provided. The proposed addition of 28 hospital beds in this application is understood to be a marginal increase to the approved development over the site, and does not alter the fundamental nature, scale or intensity of the development to the extent that would otherwise trigger the need for a new or updated Traffic impact Assessment. On this basis, the proposed change is unlikely to give rise to any new or worsened traffic impacts or necessitate external road upgrades or infrastructure works.

The originally approved development has been largely constructed on site, including the delivery of most of the works required to the external road network as part of the original conditions of approval. The proposed change maintains the approved 103 car parking pays provided on site, as well as the two access points to the site from O'Brien Street and Ingham Road. The retention of the existing traffic arrangements, access points and operational characteristics are therefore already established and set to function as approved, further supporting the view that a new Traffic Impact Assessment is not warranted in this instance.

The outstanding upgrades to the external road network are on track for completion prior to the commencement of the use, inclusive of the proposed changes outlined by this application. No additional external works are understood to be required as part of the proposed increase to hospital beds within the existing built form.

Accordingly, a new Traffic Impact Assessment is not necessary to assess the proposed Other Change, which can be appropriately determined having regard to the existing approval. This is further supported by a supplementary Traffic Impact Statement prepared by the Applicant's traffic engineers, *Traffix*, included in **Appendix A** of this correspondence.

We trust that this response suitably addresses Council's concerns raised in **Item 1** of the Information Request.

Item 2 – Carparking

The applicant is requested to provide an updated car parking assessment (within the new TIA) to include the approved Health care services, Shop and Food and Drink Outlet.

Reason

To demonstrate compliance with Performance Outcome PO17 of the Transport impact, access and parking code and to allow a comprehensive assessment of the anticipated parking demand.

Advice

As part of the response, the applicant is requested to confirm whether the proposed Shop (Pharmacy) and Health care services (Pathology etc), as mentioned in the application material will be open to the public.

Response

In response to **Item 2** of Council’s Information Request, the Applicant emphasises the intention of the proposed development to function as a holistic facility for healthcare services within Townsville. Specifically, the proposed Shop (Pharmacy) and Health Care Services (Pathology etc.) are intended to serve an ancillary function to the hospital. It is not anticipated that these ancillary aspects will be used independently or attract patronage exclusive of the scope of the approved hospital.

Performance Outcome PO17 of the Transport impact, access and parking code states the following:

“PO17

Provision is made for on-site vehicle parking to:

- (a) Meet the demand likely to be generated by the development; and*
- (b) Avoid on street parking that would adversely impact on the safety or capacity of the road network or unduly impact on local amenity.”*

The proposed change maintains the approved 103 car parking spaces onsite and is understood to be suitable for the intended use and achieve compliance with Performance Outcome PO17 as follows:

- **Nature of operations** – The previous traffic statement assessed the parking requirement to be 143 parking spaces, based on the rates prescribed by the *Townsville City Plan (City Plan)*, assuming all 100 staff and 20 doctors are on-site simultaneously. The Weststate Private Hospital, however, is intended to operate 24 hours via a 3-shift model. The operational peak of employees at any given time (including during shift overlaps) is a maximum of 70 staff, which has been assessed in the updated Traffic Impact Statement provided in **Appendix A**;
- **Patients and Visitors** – Combined with the expected number of patients and visitors to the site at any given time peaking at 22 during the day shift, the Applicant’s traffic engineers conclude that at no point does the parking demand exceed the available 103 parking spaces (see **Appendix A**). This is also consistent with the operational nature of a hospital, where the majority of patients require overnight accommodation as part of their care; and
- **Traffic Generation** – The anticipated traffic generation by the proposed increase in hospital beds is not expected to result in a significant increase to that already contemplated for the site by previous Traffic Impact Assessments (see **Appendix A**).

The operational peak demand anticipated for the site requires approximately 65 parking spaces, resulting in a consistent surplus of approximately 13 spaces at any given point. The proposed 103 car parking spaces

maintained by this current application therefore achieves compliance with the relevant requirements of Performance Outcome PO17.

We trust that this response suitably addresses Council's concerns raised in **Item 2** of the Information Request.

Summary

This correspondence constitutes the total extent of the Applicant's response to the information request made by Council in accordance with section 13.2(a) of the DA Rules. We ask that Council progress the assessment of the application on that basis.

If you have any questions regarding the above or attached material, please do not hesitate to contact the undersigned or **Rauha Firaq** (Consultant) on (07) 3007 3800.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Erin Brooks". The signature is fluid and cursive.

Erin Brooks
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Appendix A – Traffic Impact Statement