

MP ref: M2592  
 DA ref: MCU25/0103  
 QA: ed.gm.

5 March 2026

Assessment Manager  
 Townsville City Council  
 PO Box 1268  
 TOWNSVILLE QLD 4810  
 Via: *developmentassessment@townsville.qld.gov.au*

**Attention: Maris-Claire Salazar – Planning and Development**

Dear Maris-Claire,

**Re: Response to Information Request  
 Development Application seeking a Development Permit for Material Change of Use – Health Care Service (Doctors Clinic) and Dwelling Unit on land described as Lot 55 on T11884 and located at 30 Paxton Street, North Ward**

On behalf of the Applicant, Milford Planning refer to the abovementioned development application and to correspondence dated **23 January 2026**, being the formal Information Request issued by Townsville City Council (Council) (refer **Attachment 1**).

In response to Council’s Information Request, and in accordance with Section 13.2 of the Development Assessment Rules, we hereby provide a response to all of the information requested as detailed in **Table 1** below.

<b>Table 1 – Response to Information Request</b>	
<b>Item</b>	<b>Response</b>
<b>Item 1</b> Justification regarding location and off-site impacts of use	<p>This item requested to provide further justification regarding the location of the proposed commercial use within the Character residential zone (Grand Queenslanders precinct) instead of the nearby established centre zones and further justification as to how the commercial use will mitigate off-site impacts to the surrounding residential uses.</p> <p>In response to this item, we confirm our assessment that:</p> <p><u>1.) The proposed development is appropriate for the character</u></p>

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**Table 1 – Response to Information Request**

Item	Response
	<p>residential zone. Specifically:</p> <ul style="list-style-type: none"><li>▪ The proposal involves retaining, renovating and reusing a contributing character building, thereby avoiding its relocation or demolition and conserving its contribution to the streetscape and character of the area;</li><li>▪ The development works have been very carefully designed to be reversible – so that the building could be simply modified in future to be wholly used as a dwelling;</li><li>▪ The development has a significant residential component, involving the reuse of the existing dwelling floor plan. This in all likelihood will be accommodate an employee of the business</li></ul> <p>2.) The proposed health care service is a small-scale general practice clinic that will provide valuable primary health care services to the surrounding community. North Ward and surrounding suburbs has unmet demand for such health care services, and in that way it will successfully provide a 'local service for local people' that is needed within the community. The 'local' nature of proposal is supported through the provision of accommodation on-site.</p> <p>3.) The proposed development has been carefully designed with full consideration of the Character Residential Zone and it intent to accommodate low-intensity, locally focussed uses. The built form responds directly to the outcomes sought by the zone code, which recognises the roles of community uses and small-scale services that provide a direct benefit to local residents and contribute to the day-to-day functioning and liveability of established residential neighbourhoods.</p> <p>4.) There is no land included in the commercial zone that is available and more appropriate to accommodate the proposed use, including its residential component.</p> <p>5.) The development enhances the buildings visual presentation in a manner consistent with the outcomes of the code, while remaining compatible with the established character of the precinct and streetscape. The site selection has been deliberate, reflecting its location within an already built-up area that accommodates a mix of residential, commercial and health-related services in the immediate vicinity, reenforcing the appropriateness of a small-scale, community serving use in its location.</p> <p>6.) The development will not create result in unacceptable adverse amenity impacts on adjoining uses – given its low intensity, the residential scale of the building, and the (low impact) characteristics of the proposed use. It is noted that the uses is only marginally more intense than a home-based business, and not at a scale of the other non-residential uses that occur (and have existed for decades) in Paxton Street.</p>
<p><b>Item 2</b> Alignment with the character of the Grand Queenslanders</p>	<p>This item requested to provide amended plans detailing that the roof pitch of the existing dwelling is maintained and that the ground floor is setback 1m from the front façade, featuring a valance. Where the above cannot be achieved, the applicant is requested to provide further justification against PO70 and PO71 of the Character residential zone</p>



**Table 1 – Response to Information Request**

Item	Response
Precinct	<p>code.</p> <p>In response to this item, it is confirmed that the proposed development retains and utilises the existing contributing character building without modification to the roof pitch or structure. While the dwelling is currently single storey, the raising of the building to accommodate an enclosed ground floor is not considered to detract from the established character of the building. The ground floor incorporates a valance to the eastern elevation, consistent with the location of the existing veranda, which reinforces traditional character elements.</p> <p>The ground floor adopts the same footprint as the original dwelling and does not introduce a 1-metre setback from the eastern portion of the front façade. Notwithstanding this, the proposed layout maintains the visual prominence of the original building form and does not adversely impact its character significance. The provision of an open veranda further enhances the presentation of the dwelling and is consistent with the architectural features of contributing character buildings. On this basis, the proposal is considered to achieve the intent of PO70.</p> <p>In relation to PO71, the proposal involves no alteration to the existing roof form or pitch. The roof pitch is retained in its current configuration, ensuring the dominant roof form of the character building remains unchanged. Accordingly, the proposed development complies with PO71 of the Character Residential Zone Code.</p> <p>The proposed works are sympathetic to and consistent with the character of the existing dwelling and reflect the built form of contributing character buildings within the immediate locality. Given the site context and surrounding development pattern, the proposal will not detract from the character or visual cohesion of the area.</p>
<b>Item 3</b> Amend layout plan with vehicle dimensions and swept paths	<p>This item requested to provide an amended plans detailing the following:</p> <ul style="list-style-type: none"><li>▪ Driveway dimensions and layout in accordance with AS2890.1, or otherwise provide vehicle movement swept paths from a qualified RPEQ demonstrating that passenger vehicles and an ambulance can be parked and satisfactorily manoeuvre without undue conflict with pedestrians and other vehicles; and</li><li>▪ Vehicle swept paths for an MRV service vehicle, demonstrating that it can safely and conveniently enter and exit the rear section of the site for occasional loading/unloading.</li></ul> <p>In response to this item, it is noted that the proposed driveway has a minimum width of 4.44 metres. In accordance with AS2890.1, curved driveways are required to have a width between 3.0 metres and 5.5 metres. The proposed driveway width therefore complies with the acceptable range prescribed by the standard.</p> <p>While concerns have been raised regarding the narrow driveway section, 90-degree bend and proximity of the rear stairway, these matters can be appropriately addressed through detailed design and conditions of approval. A condition can require the submission of certified swept path diagrams prepared by a qualified RPEQ demonstrating that:</p> <ul style="list-style-type: none"><li>▪ Passenger vehicles can safely enter, manoeuvre and exit the site</li></ul>



**Table 1 – Response to Information Request**

Item	Response
	<p>in a forward direction;</p> <ul style="list-style-type: none"><li>▪ An ambulance can access the site and undertake turning movements as required; and</li><li>▪ An MRV service vehicle can safely access the rear of the site for occasional servicing.</li></ul> <p>Should swept path analysis identify minor design refinements as necessary such as localised widening at the bend (which can be accommodated by reducing the landscaped area) or minor stairway adjustment, these can be incorporated at detailed design stage without altering the overall development intent. The matter is considered capable of being resolved by condition, with compliance to AS2890.1 and demonstrated vehicle manoeuvrability to be confirmed prior to operational works or building approval.</p>
<p><b>Item 4</b> Provide a concept stormwater plan</p>	<p>This item requested to demonstrate compliance with the Townsville City Plan and associated policy guidelines, including in particular PO10 and PO11 of the Healthy waters code by providing a concept stormwater plan demonstrating how site stormwater will be managed to not cause a new or increased nuisance along Paxton Street.</p> <p>This concept plan will address how runoff from the parking spaces, driveways, building roof, and any contributing runoff from upstream properties can be appropriately discharged to the road network (in accordance with QUDM requirements and without causing a nuisance to users of the verge and roadway).</p> <p>In response to this item, all stormwater runoff generated by the development, together with any contributing runoff from upstream areas, will be collected and directed toward the Paxton Street frontage for lawful discharge to the existing road drainage network, in accordance with the QUDM. A stormwater pit is located directly in front of 28 Paxton Street, providing an appropriate and established point of discharge.</p> <p>The stormwater management approach satisfies the intent of PO10, as the proposed development will not adversely affect the flooding or drainage characteristics of upstream, downstream, or adjoining properties. Stormwater will not be discharged onto neighbouring private land and no changes to overland flow paths effecting surrounding properties are proposed.</p> <p>The development also complies with PO11, as the design will ensure that runoff is conveyed in a controlled manner that avoids ponding and does not result in changes to flow rates or velocities that could adversely affect the safety, use or enjoyment of nearby properties, the road verge, or the roadway. The increase in impervious area will not result in nuisance to pedestrians or vehicles using Paxton Street, as flows will be appropriately captured and discharged to Councils infrastructure.</p> <p>Given the nature and scale of the development, it is considered appropriate that the stormwater plan be prepared during the Building Works or Operational Works Stage, when final site level, drainage infrastructure and construction details are confirmed. Accordingly, it is proposed that the provision of a concept stormwater management plan be secured as a condition of approval, with detailed design to be submitted and approved prior to the commencement of the use or as part</p>



**Table 1 – Response to Information Request**

Item	Response
	of the operational works approval process. This approach ensures full compliance with the Healthy Waters Code while allowing stormwater design to be undertaken at the most appropriate stage of the development process.

**Proceeding**

We trust the above and attached information is sufficient to allow Council to assess the development application. If Council is of the view that the response does not appropriately address the Information Request, we request the opportunity to meet to discuss further.

If you have any questions regarding this correspondence, please contact the undersigned or George Milford on TEL: (07) 4724 0095.

Yours sincerely,

**MILFORD PLANNING**

  
Electronic

Libby Dixon  
TOWN PLANNER

Encl: Council Information Request



23 January 2026

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Dear Sir/Madam

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## Information Request

### *Planning Act 2016*

As per our telephone conversation on 22 *January 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

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Application no:	MCU25/0103
Assessment no:	0234026
Proposal:	Dwelling Unit & Health Care Services
Street address:	30 Paxton Street NORTH WARD QLD 4810
Real property description:	Lot 55 T 11884
Applicant's reference:	M2592

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The information requested is set out below >>

#### Request Item 1 - Further justification regarding location and off-site impacts of use

The applicant is requested to provide further justification regarding the location of the proposed commercial use within the Character residential zone (Grand Queenslanders precinct) instead of the nearby established centre zones and further justification as to how the commercial use will mitigate off-site impacts to the surrounding residential uses.

##### Reason

To demonstrate compliance with the Character residential zone code of the Townsville City Plan.

##### Advice

Applicants should have regard to the outcomes and purpose of the Character residential zone code as well as SC6.5 Economic impact assessment planning scheme policy for guidance on addressing this request item.

#### Request Item 2 - Alignment with the character of the Grand Queenslanders precinct

The applicant is requested to provide amended plans detailing that the roof pitch of the existing dwelling is maintained and that the ground floor is setback 1m from the front façade, featuring a valance.

Where the above cannot be achieved, the applicant is requested to provide further justification against PO70 and PO71 of the Character residential zone code.

#### Reason

To demonstrate compliance with PO70 and PO71 of the Character residential zone code of the Townsville City Plan.

#### Request Item 3 - Amend layout plan with vehicle dimensions and swept paths

The applicant is requested to provide an amended plans detailing the following:

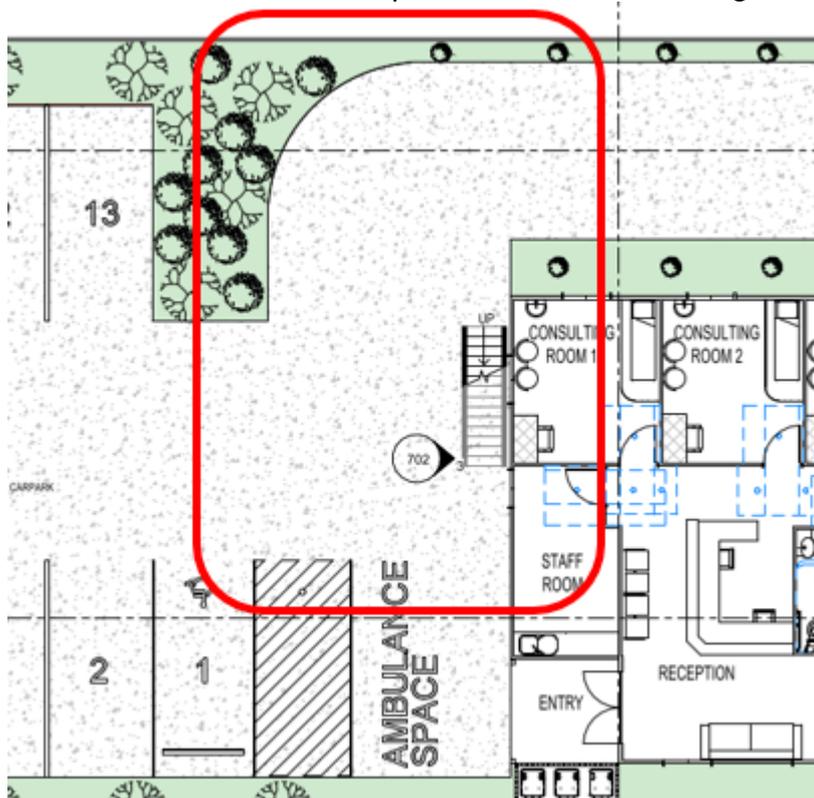
- Driveway dimensions and layout in accordance with AS2890.1, or otherwise provide vehicle movement swept paths from a qualified RPEQ demonstrating that passenger vehicles and an ambulance can be parked and satisfactorily manoeuvre without undue conflict with pedestrians and other vehicles; and
- Vehicle swept paths for an MRV service vehicle, demonstrating that it can safely and conveniently enter and exit the rear section of the site for occasional loading/unloading.

#### Reason

To demonstrate compliance with the Townsville City Plan and associated policy guidelines, including in particular PO20 and PO26 of the Transport impact, access and parking code and PO33 of the Works code.

#### Advice

*It appears that the narrow section of driveway (4.44m width), tight 90-degree bend, and rear building stairway may result in poor visibility, inconvenient and/or unsafe passenger vehicle manoeuvring, and potential safety risks for pedestrians. This is also likely to be particularly problematic for the occasional ambulance or service vehicle accessing the rear of the site. Consideration should be given to relocating the rear stairway, widening the driveway, reducing the driveway bend angle, the need for a dedicated ambulance space and/or other measures to improve on-site manoeuvring.*



#### Request Item 4 - Provide a concept stormwater plan

The applicant is requested to provide a concept stormwater plan demonstrating how site stormwater will be managed to not cause a new or increased nuisance along Paxton Street.

This concept plan will address how runoff from the parking spaces, driveways, building roof, and any contributing runoff from upstream properties can be appropriately discharged to the road network (in accordance with QUDM requirements and without causing a nuisance to users of the verge and roadway).

#### Reason

To demonstrate compliance with the Townsville City Plan and associated policy guidelines, including in particular PO10 and PO11 of the Healthy waters code.

#### Advice

Significant impervious area will be added due to the development (going from under 25% site cover to over 75% site cover), which will increase the peak rate of runoff from the site which per the layout will discharge to the street via the new driveway crossover.

Any changes to the carpark may require revision of the landscaping on the site.

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#### Advice Item 1

The applicant is advised that a development application for building works assessable against the planning scheme is required for any physical changes to the contributing character building as per the tables of assessment for building works (Table 5.7.1) under the Townsville City Plan.

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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.

For any response given in accordance with items (b) and (c) above, you may also advise Council that it must proceed with its assessment of the development application.

Please be aware that under the Development Assessment Rules under the *Planning Act 2016*, the applicant is to respond to any Information Request within **3 months** of the request. If you do not respond to the Information Request within this time period, or, within a further period agreed between the applicant and Council, it will be taken that you have decided not to provide a response. In the event of no response being received, Council will continue with the assessment of the application without the information requested.

Council prefers that all of the information requested be submitted as one package. If any additional matters arise as a result of the information submitted, or, as a result of public notification (where applicable), you will be advised accordingly.

Should any referral agency make an information request, you are reminded of your obligation to provide council with a copy of the information response provided to that referral agency.

You may wish to follow the progress of this application using PD Online on Council's website [www.townsville.qld.gov.au](http://www.townsville.qld.gov.au)

If you have any further queries in relation to the above, please do not hesitate to contact Maris-Claire Salazar on telephone 07 4727 9412, or email [developmentassessment@townsville.qld.gov.au](mailto:developmentassessment@townsville.qld.gov.au).

Yours faithfully

A handwritten signature in black ink, appearing to be 'M. Salazar', written in a cursive style.

**For Assessment Manager**  
Planning and Development