

Town Planning Report

*Other Change Application to
Existing Development Approval*

April 2026

Prepared for: CHPF South Bunbury Pty Ltd

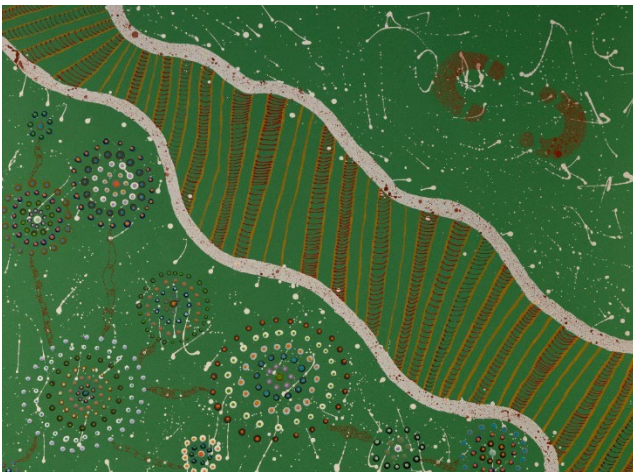
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Report Number Version 1

Acknowledgment of Country

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Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Rpt - 260414 - Other Change Planning Report - Weststate Private Hospital

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Executive Summary

Urbis has been commissioned by *CHPF South Bunbury Pty Ltd (the Applicant)* to make a Change Application (Other Change) to Development Approval MI7/0007 pursuant to Section 78 of the *Planning Act 2016 (Planning Act)*. The site is located at 37 Ingham Road, West End QLD 4810, formally described as Lot 707 on SP327134. It is commonly referred to as the Weststate Private Hospital. The site benefits from an existing Development Approval for Material Change of Use for Hospital (22 Beds), Health Care Services, Shop (Pharmacy) and Food and Drink Outlet and Preliminary Building Works and subsequent minor changes (Council Ref.: MI7/0007 & P&E Court Ref: 13/18, 176/20 and 155/23).

Since the current approval was granted by way of Consent Order by the Planning and Environment Court on 27 February 2020 and subsequent minor changes on 19 January 2021 and 11 December 2023, Townsville City Council's planning policy and growth context has evolved. Of note, the growing population and ageing demographic has increased the demand for healthcare services across both public and private sectors.

The Applicant has worked to refine the design, responding to both market demand and future tenant requirements, in efforts to deliver a high-quality hospital offering to service Townsville and North Queensland more broadly. Specifically, the Applicant is proposing to increase the number of hospital beds delivered within the existing built form from 22 to 50. The proposed change represents a well-positioned contribution to the delivery pipeline of hospital beds in the region, aiming to respond to increasing demand in a fast-paced manner. Importantly, the refined proposal maintains its function as a key healthcare provider within Townsville.

The locational attributes of the site ensure that it is well suited to accommodate the proposed increase in number of hospital beds. This application is supported by traffic and civil engineering memorandums, confirming that the existing approved site car parking provisions and infrastructure can adequately accommodate the anticipated network demand resulting from the proposed changes.

Site and Proposal Details

Key Details	Proposal Details
Site Address	37 Ingham Road, West End QLD 4810
Real Property Description	Lot 707 on SP327134
Zone	Mixed Use Zone
Proposed Development	Other Change to Development Permit for Material Change of Use for Hospital (22 beds) Health Care Services, Shop (Pharmacy) and Food and Drink Outlet
Level of Assessment	Impact Assessment
Referral Agencies	State Assessment and Referral Agency

Aspects of Development

This application seeks the following development approval:

Aspect of Development	Development Approval Sought	Category of Assessment
Other Change to Development Approval for Material Change of Use for Hospital (22 beds), Health Care	Development Permit	Impact Assessable

Applicant Details

Applicant	Urbis Contact Details
CHPF South Bunbury Pty Ltd C/- Urbis Ltd Level 32, 300 George Street Brisbane QLD 4000	Rauha Firaq Ella Middleton (07) 3007 3800

Reasons for Approval

Overall, this report demonstrates that the proposed development warrants approval for the following reasons:

- The proposed changes to the approved development are consistent with the relevant provisions of the Townsville City Plan (**Planning Scheme**), particularly the themes and outcomes of the strategic framework, purpose, overall outcomes and the application of zone code provisions.
- The proposed changes remain generally consistent with the previous approval. The development continues to deliver a Hospital and Health Care Service led scheme, supported by ancillary Food and Drink Outlet and Shop (Pharmacy) uses. The proposal intends solely to reconfigure the internal layout of the approved and largely delivered building footprint at the site.
- The proposed changes, contained within the existing built form, continues to ensure that the development complements its surrounding land use, context and maintains the overall amenity of the area.

Council's approval of the application is therefore sought, subject to relevant and reasonable conditions.

Introduction

On behalf of *CHPF South Bunbury Pty Ltd* (**the Applicant**), Urbis have prepared this town planning assessment report in support of a proposed change to an existing Development Approval for Material Change of Use for Hospital (22 Beds), Health Care Services, Shop (Pharmacy) and Food and Drink Outlet and Preliminary Building Works over the site at 37 Ingham Road, West End QLD 4810 (Council Ref.: MI7/0007).

The application seeks an Other Change under Section 82 of the *Planning Act 2016* (**Planning Act**) to the abovementioned development approval (Council Ref.: MI7/0007 and Planning and Environment Court Ref.: 13/18, 176/20 & 155/23) (**existing approval**).

Since the existing approval was issued for the site, the Applicant and project team have undertaken a detailed design review to respond to the growing demand for hospitals and health care facilities across Townsville and North Queensland more broadly. This has resulted in the proposed changes, with the aim of ensuring that the revised scheme maximises the provision of hospital beds at the site to align with the expectations of provisional future tenants.

The key change being sought for the approved development is the increase of total bed provision by 28 additional beds at Level 4 of Building A, resulting in an overall delivery of 50 beds within the site. The proposal will support the continued operation and capacity of the approved hospital, enabling it to better meet the current and future healthcare needs while maintaining its intended role within the local health services network. In addition to the proposed increase in hospital beds, the Applicant has undertaken amendments to the internal configurations of Levels 1-3 of Building A as a result of the detailed design process. These internal changes intend to facilitate improved delivery of health care services onsite.

As detailed further in this report, this Other Change application is identified as being subject to Impact Assessment in accordance with Section 45(5) of the Planning Act. This report addresses the merits of the development with regard to the assessment benchmarks under the *Townsville City Plan* (version 2025/01) (**City Plan**) and other relevant planning instruments and considerations.

This report is accompanied by and should be read in conjunction with the following supporting plans and technical reports:

- **Appendix A** – DA Forms;
- **Appendix B** – Property Searches and Owner’s Consent;
- **Appendix C** – Architectural Plans, prepared by *HSPC Health Architects*;
- **Appendix D** – Traffic Impact Statement, prepared by *TRAFFIX*;
- **Appendix E** – Infrastructure Memo, prepared by *DPM Water*;
- **Appendix F** – TCC and SDAP Assessment Benchmark Responses.
- **Appendix G** – Regional Capacity Need Memo, prepared by *CHPF South Bunbury Pty Ltd*.

The assessment of the application is to be undertaken in accordance with Section 45(5) of the *Planning Act 2016* and Sections 30 and 31 of the *Planning Regulation 2017*. This report provides the Applicant’s assessment against these provisions and concludes that the proposed changes are appropriate, generally consistent with State and Local legislative frameworks and are not anticipated to impact upon the amenity of the locality. Council’s approval of the application is therefore sought, subject to reasonable and relevant conditions.

1 The Site

1 The Site

The site is located on a corner site of O'Brien Street and Sturt Street in Townsville. It benefits from frontages to Ingham Road (approx. 130m), Sturt Street (approx. 58m) and O'Brien Street (approx. 75m) (see **Figure 1**). The site is irregular in shape, with a total area of approximately 7,846m². This land is identified as 37 Ingham Road and is located approximately 200m south-west of Townsville CBD. The site is located within a mix of existing commercial, retail and residential land uses with mixed-use development adjoining the site.

The site is currently improved by the Queensland Heritage listed Townsville and District Education Centre and Memorial Gates¹ (**Building B** identified in yellow) and the more recently constructed Annexure at the intersection of Ingham Road and Sturt Street (**Building A** identified in red). The approved five storey building has largely been delivered at the site.

Figure 1 – Site Aerial



Source: Nearmap, 2026

1.1 Site Details

Key details of the site are outlined in **Table 1** below.

¹ Also known as the Townsville West State School.

Table 1 – Site Details

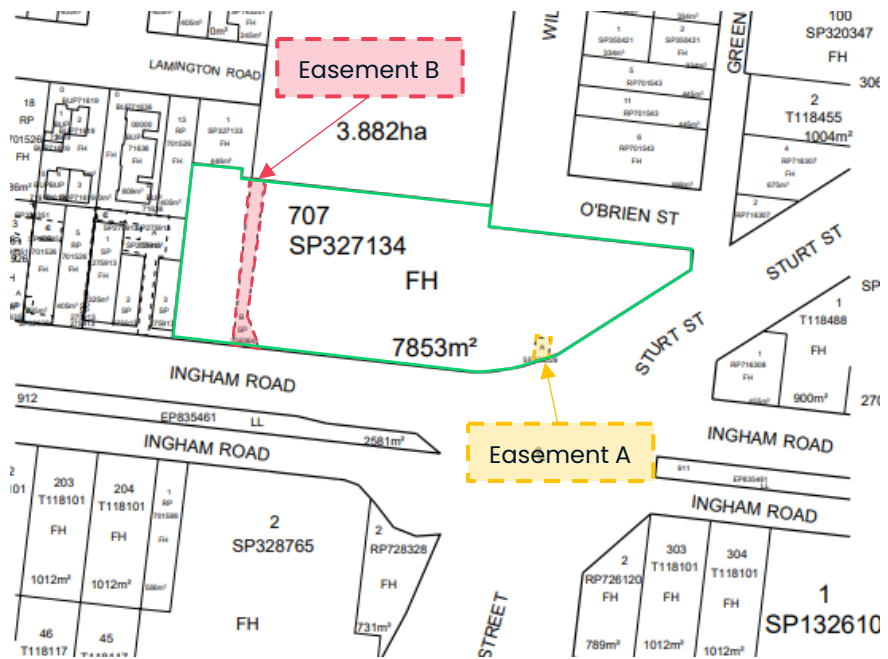
Category	Description
Site Address	37 Ingham Road, West End QLD 4810
Real Property Description	Lot 707 on SP327134
Site Area	7,846m ²
Land Owner	CHPF South Bunbury Pty Ltd (A.C.N. 637 758 957)
Contaminated Land	The site is not included on the Contaminated Land Register ('CLR') and Environmental Management Register ('EMR'). A copy of the EMR and CLR certificates for the site are included in Appendix B of this report.

Easements

The western and south-eastern portions of the site is burdened by the following two easements as follows and illustrated in **Figure 2** below:

- Easement A on SP338028 in Lot 707 on SP327134 burdening the site (Electricity Supply and Incidental Works)
- Easement B in Lot 707 on SP253232 burdening the site (Stormwater)

Figure 2 – Easements



Source: Queensland Globe

Existing Land Use

The site is currently improved by the Queensland Heritage listed Townsville and District Education Centre and Memorial Gates, and the recently constructed Annexure for a Hospital.

Existing DA Approval Land Use

Hospital (22 Beds), Health Care Services, Food and Drink Outlet and Shop.

Property searches are provided in **Appendix B**.

1.2 Surrounding Context

Figure 3 – Surrounding Context



Source: Nearmap, 2026

The land immediately surrounding the subject site is characterised by a mix of uses, including community facilities, heritage-protected land and low-scale development (refer to **Figure 3**). Specifically, the nearby uses include the following:

- **North:** The Townsville West State School Heritage site and associated educational and community facilities, alongside the West End Cemetery Heritage Site. Surrounding low density residential dwellings form a predominantly institutional and residential interface, with the Castle Hill reserve located beyond.
- **East:** Low-scale commercial buildings transitioning toward the cultural education and community precinct, and the mixed-use gateway to the Townsville CBD. The Townsville Railway Station is located at the intersection of the gateway, reinforcing the site's key strategic location for civic and transport uses.
- **South:** The Townsville Heritage Centre and Saint Mary's Catholic Church, and the North Coast Railway line, a strategic rail corridor providing regional connectivity between Brisbane and Cairns.
- **West:** The Townsville Showgrounds Heritage site and associated mixed-use ancillary structures, surrounding by a mix of complementary centre uses and low-density one to two storey detached residential dwellings.

2 Approval History & Prelodgement Engagement

2 Approval History & Prelodgement Engagement

The site is subject to an existing development approval which enables the future development of the site.

2.1 Existing Development Approval

The original approval over the site is for a Material Change of Use to deliver a Hospital with 22 beds, Health Care Services, Shop (Pharmacy) and Food and Drink Outlet and Preliminary Building Works against the Planning Scheme for demolition of dwelling.

Council approved the original application by way of Decision Notice on 20 December 2017 (Council Ref.: M117/0007 and AP18/0001.02). The approval was subsequently appealed by a submitter. The appeal was dismissed via Planning and Environment Court Judgement on 27 February 2020, with the application being ultimately approved via Consent Order (P&E Court Ref.: 13/18). Shortly after, minor changes to the development approval were approved by way of Consent Order via Planning and Environment Court Judgement dated 19 January 2021 (P&E Court Ref.: 176/20) and 11 December 2023 (P&E Court Ref.: 155/23).

The Material Change of Use approval remains current, with a currency period until **11 May 2028**, verified by Council via email correspondence dated 2 December 2025.

The Applicant notes that the approved five storey building has largely been delivered at the site, with the proposed changes largely pertaining to the area identified in the approval as 'Building A', illustrated in **Figure 4** below.

Figure 4 – Approved Development



Source: Nearmap

2.2 Prelodgement Engagement

A prelodgement meeting with Townsville City Council (**Council**) officers was held to discuss the proposed changes on 10 March 2026. Council indicated in the meeting that the proposed changes were supported in principle. Overall, Council provided a positive response to the revised design and generally supported the increase in hospital bed delivery subject to further assessment and demonstration that potential impacts are appropriately mitigated. In response to Council's advice, this development application is supported by updated specialist reporting, detailed further in **Section 4**, confirming that the proposed changes do not result in negative amenity impacts or infrastructure burden to the surrounding context. .

3 Proposed Design Changes

3 Proposed Design Changes

This application seeks an 'Other Change' to the existing approval for the site. This Other Change application is made in accordance with Sections 78 and 82 of the Planning Act.

The proposed changes to the approved development are generally summarised as follows:

- **Increased number of beds** – implementation of 28 additional hospital beds within Level 4 of the existing building form.
- **Layout reconfiguration** – changes to the internal configurations of Levels 1-3 to facilitate improved delivery of health care services onsite.

Each of the above components of the changed design are discussed in greater detail under the following subheadings. Elements of the existing approval that are not proposed to be updated or are irrelevant to planning matters have not been discussed below.

As described in the introduction of this report and discussed in the prelodgement meeting, the Applicant and the project team have undertaken a detailed design review to ensure that the development will achieve a viable scheme that meets the current demand of the health sector across Townsville and the region more broadly. The changes proposed as part of this application reflect design changes that are necessary to ensure efficient delivery of health care services within the approved built form and reflect the needs of prospective service providing tenants of the site.

A complete set of revised architectural plans is provided in **Appendix C** of this application.

3.1 Increased number of beds

The Applicant intends to expand on the existing service provision of the approved hospital facility by providing an additional 28 beds, to be delivered at Level 4 of Building A (see **Figure 5**).

Figure 5 – Proposed Level 4



Source: HSPC Health Architects

This increase is intended to respond to demonstrated and ongoing demand for hospital and health care services within Townsville and the broader region, discussed further in **Section 7** of this report. The increased beds will continue to support the continued operation and capacity of the approved hospital, enabling it to better meet current and future health care needs while maintaining its intended role within the local health services network.

The proposed additional beds further represent the Applicant's intention to ensure the approved development remains consistent with the needs of health care operators within the region. The proposed

additional beds reflect a growing demand from prospective tenants, responding directly to the overarching demand for health care service provision across regional Queensland.

Importantly, the proposed operator model of the development remains unchanged. The intent is for the site to continue to deliver a short-stay private hospital, with limited overnight stays anticipated. No changes to the existing approved business model and activity profile are proposed as part of this application.

As such, no changes are proposed to the car parking provision currently approved over the site. The delivery of the proposed beds is not anticipated to generate additional traffic beyond what has been already contemplated and approved over the site. This is further supported by a memorandum from the Applicant's traffic engineer, *TRAFFIX*, and detailed in **Section 4.1** of this report. Similarly, no additional demand on the existing infrastructure provision to the site is anticipated. The delivered infrastructure had previously contemplated increased demand in the future and has the capacity to service any additional demand placed on the network by the proposed additional beds. This is further supported by a memorandum prepared by the Applicant's civil engineer, *DPM Water*, and detailed in **Section 4.2** of this report.

Clinical and related waste generation rates, as outlined in the original application material, directly relate to the types of medical services offered at the facility. It is anticipated, however, that the existing refuse storage and proposed collection via private contractor can sufficiently service the additional waste generated by the proposed changes. As a tenant for the site has yet to be secured, the Applicant requests that Council imposes the provision of an Operational Waste Management Plan as a condition of approval.

3.2 Layout reconfiguration

To best position the development to prospective tenants, the Applicant also proposes revised internal configurations of the existing approved 22 hospital beds onsite at Levels 1-3 of Building A. These revisions, once again, are contained within the existing built form and intend to facilitate improved delivery of healthcare services onsite. They are minor in nature and would otherwise be considered generally in accordance. Nonetheless, the revised layouts are included as part of this application for completeness.

4 Updated Specialist Reporting

4 Updated Specialist Reporting

The following specialist reporting has been prepared in support of this change application:

- **Appendix D** – Traffic Impact Statement, prepared by *TRAFFIX*; and
- **Appendix E** – Infrastructure Memo, prepared by *DPM Water*.

4.1 Traffic Impact Statement

A Traffic Impact Statement has been prepared by *TRAFFIX* and is provided in **Appendix D** of this report. The statement provides an assessment of the traffic and parking impacts resulting from the proposed additional beds. The key findings of the assessment are outlined as follows:

- The proposed development satisfies the parking requirements set out by the Townsville City Plan;
- It is also noted that the site is conveniently located within 350 metres (approx.) of bi-directional bus routes at the Ingham Road – Church Street intersection and benefits from existing pedestrian and cycling infrastructure. These provide staff and visitors with a range of convenient travel options to and from the site, in addition to private vehicle use;
- The traffic generation potential of the proposed development has previously been taken into consideration within the existing approval documents. The proposed changes, therefore, are not expected to impact on the satisfactory operation of the development in accordance with the current approval.

Overall, the proposed changes are not anticipated to impact on the transport arrangements approved over the site, and are supportable from a traffic engineering perspective.

4.2 Infrastructure Memo

A civil engineering memorandum has been prepared by *DPM Water* (refer to **Appendix E**) to provide advice on the proposed development with regards to civil engineering infrastructure, stormwater quality and quantity measures, flooding and drainage. The key conclusions are:

- The proposed development satisfies the reticulated water supply requirements set out by Townsville City Council's standards;
- It is noted that the proposed development can be serviced with peak hour water demands from the existing water mains that service the site;
- The site is currently serviced by two separate sewer lines, with one sewer to be diverted along O'Brien Street in accordance with prior discussions with Council;
- Sewage flows associated with the redevelopment of the heritage school building will be directed to the existing DN150 relined sewer to the west of the building, and the existing sewer network has sufficient capacity to service the proposed private hospital development.

Overall, the proposed changes are not anticipated to impact on the civil infrastructure approved and existing over the site.

5

State Planning Framework

5 State Planning Framework

5.1 The Planning Act 2016

The *Planning Act 2016* (**Planning Act**) is the statutory instrument for the State of Queensland under which, amongst other matters, development applications are assessed by local governments. The purpose of the Planning Act is to facilitate the achievement of ecological sustainability by establishing an efficient, effective, transparent, integrated, coordinated and accountable system of land use planning, development assessment and related matters.

This application includes Material Change of Use components that are assessable development. A Development Permit or Material Change of Use is therefore required prior to the commencement of the use.

The City Plan states that the proposed development is subject to Impact Assessment as a consequence of the proposed Hospital land use (discussed further in **Section 6**). Impact assessment may be carried out against, or have regard to, any other relevant matter, other than a person's personal circumstances.

5.2 Other Change Provisions

Section 82 of the Planning Act establishes how an Other Change application to development approvals is to be assessed and decided. Section 82(2)(a)(ii) specifies the following key provision for categorising, assessing and deciding Other Change applications:

"82(2)(a)(ii)

The change application were the original development application, with the changes included, but was made when the change application was made."

In view of the above, the Other Change application is to be categorised, assessed and decided as though it were a new development application with the changes included. The relevant statutory framework that the application is to be categorised, assessed and decided in accordance with is that which is in force at the time the application is made, as opposed to the framework in force at the time of the original development application.

As outlined in **Section 6** below, a new development application for the approved development, with the proposed changes included, is subject to Impact Assessment.

Section 82(4) of the Planning Act effectively outlines the relevant matters for assessing and deciding Other Change applications:

"82(4)

...the following matters apply, only to the extent that these matters are relevant to assessing and deciding the change application in the context of the development approval –

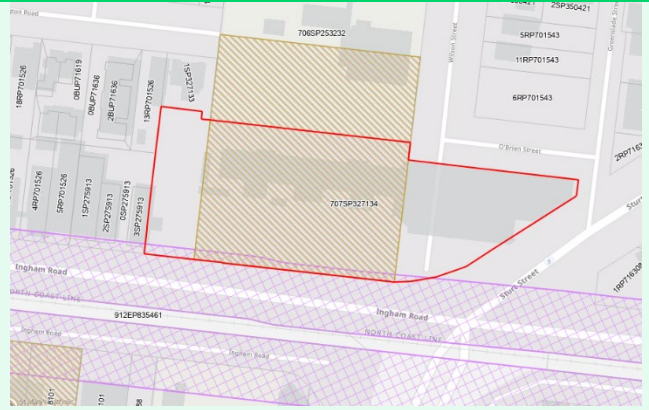
- (a) The assessment benchmarks;*
- (b) Any matters a referral agency must, may, or may only assess the application against or have regard to under section 55(2);*
- (c) ...*
- (d) If the development to which the change application relates requires impact assessment – any matters the assessment must or may be carried out against or having regard to under section 45(5)(a)(ii) or (b)."*


5.3 State Planning Framework Assessment

A summary of compliance with the relevant state planning instruments is outlined in **Table 2** below.

Table 2 - State Planning Framework Assessment

Instrument / Assessment Benchmark	Date of Instrument	Assessment
State Planning Policy (SPP)	3 July 2017	<p>Section 2.1 of the City Plan indicates that all State Interests within the SPP 2017 apply to the planning scheme area.</p> <p>The following State Interest matters are identified as being applicable to the site:</p> <ul style="list-style-type: none"> ▪ Cultural Heritage <ul style="list-style-type: none"> – State heritage place ▪ Natural Hazards Risk and Resilience <ul style="list-style-type: none"> – Flood hazard area – local government flood mapping area – Level 1 – Queensland floodplain assessment overlay ▪ Strategic Airports and Aviation Facilities <ul style="list-style-type: none"> – Lighting area buffer 6km – Wildlife hazard buffer zone – Height restriction zone 15m – Aviation facility <p>Given the proposed changes are contained within the existing built form and are not anticipated to impact the identified State Interests, no further assessment against the SPP is required.</p>
North Queensland Regional Plan 2020 (Regional Plan)	March 2020	<p>The site is located within the <i>Area of regional economic significance</i> and <i>major knowledge and health industries</i> of the Townsville Urban Area under the Regional Plan.</p>
Referral Agencies & State Development Assessment Provisions Version 3.5 (SDAP)	12 December 2025	<p>The mapping indicates the following SDAP matters apply to the site:</p> <ul style="list-style-type: none"> ▪ Queensland Heritage Place ▪ State Transport <ul style="list-style-type: none"> – Area within 25m of a railway corridor. <p>An extract of the SDAP mapping is shown below, illustrating the extent of the mapped state interests.</p>

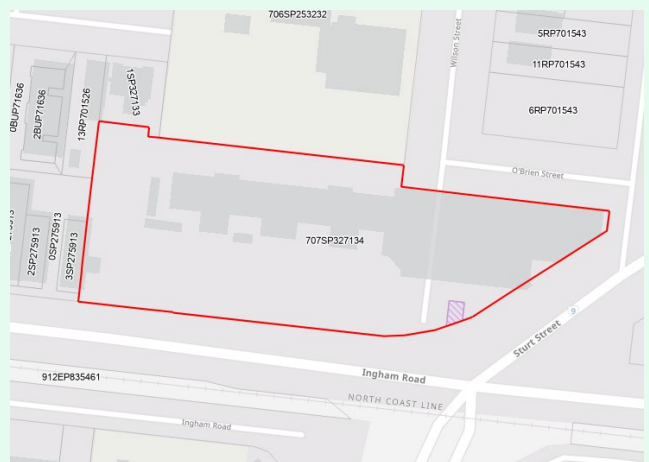



-  Queensland Heritage Place
-  Area within 25m of a railway corridor

Notably, referral to the State Assessment and Referral Agency (**SARA**) as a Concurrence Agency under Schedule 10, Part 8, Division 2, Subdivision 1 is not required as the proposed development involves only alterations to existing buildings and structures.

An assessment of the SDAP indicates that the proposal requires referral to the State Assessment and Referral Agency (**SARA**) as a Concurrence Agency, under Schedule 10, Part 9, Division 4, Subdivision 2, Table 4 of Schedule 10 of the *Planning Regulation 2017* as the development is within 25m of a railway corridor.

Additionally, the proposal requires referral to Ergon Energy as an Advice Agency under Schedule 10, Part 9, Division 2, Table 2 as part of the premises is subject to an easement for the benefit of a distribution entity (Ergon Energy). An extract of the mapping is shown below, illustrating the extent of the mapped easement.



 Ergon Easement

5.4 Referral

The proposal requires referral to **SARA** and **Ergon Energy** for the following matters:

State Matter	Planning Regulation Schedule 10 Reference	Relevant Assessment Benchmark	Referral Agency
Area within 25m of a State railway corridor	Schedule 10, Part 9, Division 4, Subdivision 2, Table 4	State Code 2: Development in a railway environment (refer to Appendix F)	SARA (Queensland Rail) (Concurrence Agency)
Part of the premises is subject to an easement for the benefit of a distribution entity (Ergon Energy)	Schedule 10, Part 9, Division 2, Table 2	N/A	Ergon Energy (Advice Agency)

6

Local Planning Framework

6 Local Planning Framework

6.1 Townsville City Plan (Version 2025/01)

The *Townsville City Plan (Version 2025/01)* (**City Plan**) is the local planning instrument that is used to assess the proposed development.

The following sub-sections of this report provide an assessment of the proposed development against the assessment benchmarks under the City Plan.

6.2 Land Use Definitions

No changes are proposed to the previously approved land uses – Hospital, Health Care Services and Food and Drink Outlet.

The relevant definitions are as follows:

Hospital – means the use of premises for

- (a) The medical or surgical care or treatment of patients, whether or not the care or treatment requires overnight accommodation; or
- (b) Providing accommodation for patients; or
- (c) Providing accommodation for employees, or any other use, if the use is ancillary to the use in paragraph (a) or (b).

Health Care Services – Health care services means the use of premises for medical purposes, paramedical purposes, alternative health therapies or general health care, if overnight accommodation is not provided on the premises.

Food and Drink Outlet – means the use of premises for –

- (a) Preparing and selling food and drink for consumption on or off the premises; or
- (b) Providing liquor for consumption on the premises, if the use is ancillary to the use in paragraph (a).

6.3 Strategic Framework

Given this application is subject to Impact Assessment, the application is required to be assessed against the City Plan as a whole, including the Strategic Framework in Part 3 of the City Plan.

The Strategic Framework sets the policy direction for the planning scheme and forms the basis for ensuring appropriate development occurs in the planning scheme for the duration of its currency period. The Strategic Framework outlines four (4) themes that collectively represent the policy intent of the scheme:

- Theme 1 – Shaping Townsville;
- Theme 2 – Strong, connected community;
- Theme 3 – Environmentally sustainable future; and
- Theme 4 – Sustaining economic growth.

The four themes articulate the strategic outcomes, elements, specific outcomes and land use strategies for the locality. Although each theme has its own section, the strategic framework in its entirety represents the policy intent for the Planning Scheme. Specifically, we have identified the following themes to be of relevance:

- Shaping Townsville
 - Element 3.3.3 Character and Heritage
 - Element 3.3.4 Activity Centres

- Strong and connected community
 - Element 3.4.5 Managing the impacts of development

6.3.1.1 Shaping Townsville – Element 3.3.3 Character and Heritage

The Shaping Townsville theme identifies a series of strategies to promote the efficient and compact delivery of Townsville’s urban areas, including Townsville’s Character and Heritage (Element 3.3.3). Development that occurs on, or near, places of cultural heritage significance must protect or facilitate their active use while reinforcing their heritage significance and setting.

The northwestern corner of the site is identified within the Character Residential (Workers Cottages Precinct) Zone. The proposed changes continue to support the Element 3.3.3 as they are limited to internal reconfigurations, protecting the approved scale and bulk of the existing development. Additionally, the changes outlined in this application are contained within Building A, while Building B (i.e. State Heritage interest) continues to maintain its character façade.

In accordance with **Section 3.3.3.2**, all land use strategies for the site should be guided by the Character Residential Zone Code which was devised to protect character areas and heritage places. A complete response to the Specific Outcomes and Land Use Strategies for Townsville’s Character and Heritage is provided as part of **Appendix F**.

6.3.1.2 Shaping Townsville – Element 3.3.4 Activity Centres

Townsville’s Activity Centres (Element 3.3.4) identifies a series of strategies to promote multi-functional centres that encourage a wide range of community and commercial activities. Development is intended to revitalise the CBD as the heart of the city by locating essential community services within a network that supports a variety of active, public and private transportation networks.

The proposed changes constitute a direct response to hospital bed demand identified in both the private and public health sectors of Townsville, detailed further in **Section 7** of this report. The additional beds will provide meaningful additional capacity within a mixed-use locality commensurate with local population growth. The proposal aligns with the strategic intent of Townsville to support the vibrancy of the local community, health opportunities and economic development.

In accordance with **Section 3.3.4.2**, all land use strategies for the site should be guided by the Mixed-Use Zone code which was devised to ensure that centres are diverse, accessible, and well-designed community hubs. A complete response to the Specific Outcomes and Land Use Strategies for Townsville’s Activity Centres is provided as part of **Appendix F**.

6.3.1.3 Strong and Connected Community – Element 3.4.5 Managing the impacts of development

This strategic outcome recognises that the character and identities of communities in urban and rural areas of Townsville strengthens the city shape through good urban design. Safe, legible and accessible access to essential community services and facilities that contribute to the wider health and wellbeing of the community is essential for urban functionality.

The proposed changes are contained within the existing and approved built form, thus is not anticipated to introduce new privacy or amenity impacts to its neighbouring context. The proposal contributes to delivering positive social impacts as it increases access to essential private health services that support the wider network to encourages better local health and wellbeing outcomes.

In accordance with **Section 3.4.5.2**, all land use strategies for the site should be guided by the zone designations, and precincts, to represent the type and scale of development intended within the area. As the proposed changes are contained within the existing and approved built form, no response is provided to the Specific Outcomes and Land Use Strategies of this Element.

6.4 Zoning

The site is located in the **Mixed Use Zone** and the **Character Residential Zone (Workers Cottages Precinct)**, as shown in **Figure 5** below.

The purpose of the Mixed-Use Zone is to provide for:

“a variety of uses and activities, including, for example, business, residential, retail, service industry, tourist accommodation or low impact industrial uses or activities”

The purpose of the Character Residential (Workers Cottages precinct) is to:

“ensure the character of a residential area is protected or enhanced, and [to] provide for community uses, and small-scale services facilities and infrastructure to support local residents”

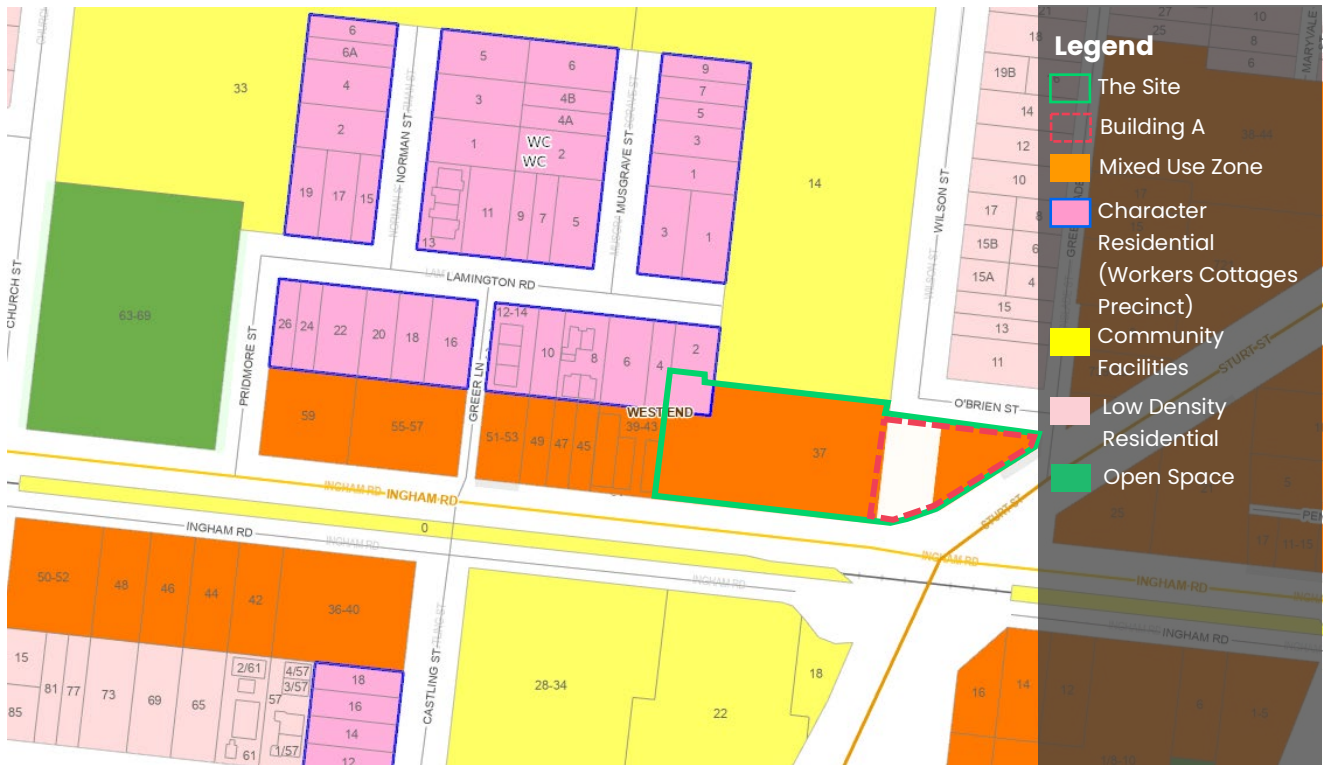
Additionally, the purpose of the Character Residential zone will be achieved through additional overall outcomes for the Workers Cottages Precinct. The overall outcomes of the Worker’s Cottages precinct ensure that:

- a. *this precinct consists of low and high set Queensland worker’s cottages and bungalows, constructed of lightweight materials;*
- b. *the consistent character of worker’s cottages and interwar houses constructed of lightweight materials is maintained;*
- c. *buildings in this precinct have open facades which address the street and are consistent with the predominant front façade profile that contributes to the precinct’s character;*
- d. *building floor level height in new development is consistent with adjoining contributing character buildings;*
- e. *enclosing the ground floor of a contributing character building does not have an adverse impact on the character of the building;*
- f. *the roof profile of buildings is consistent with that of contributing character buildings; and*
- g. *window scale and proportions of buildings are sympathetic to the predominant character of the precinct.*

As noted in **Section 3**, the proposed changes outlined in this application are contained within the footprint of the approved Building A. The premises subject to this development application, therefore, is determined to be located solely within the Mixed Use Zone. The provisions set out by the Character Residential Zone, therefore, are not relevant to the assessment of the proposed changes.

Nonetheless, the changes proposed do not alter the built form, impact development parameters or result in amenity and privacy impacts to surrounding neighbours. Consequently, it is understood that the development continues to adhere to the zone code provisions as outlined by the original application material.

Figure 6 - Zoning



Source: Townsville City Plan

6.5 Overlays

Parts of the site are identified within the following overlays:

Overlays	Sub-Category
<ul style="list-style-type: none"> Airport Environs 	<ul style="list-style-type: none"> Operational Airspace – airspace more than 15m above ground level; Wildlife hazard buffer zones and public safety areas – 8km distance from airport runway Aviation facilities – Area of Interest Lighting area buffer – 6km radius)
<ul style="list-style-type: none"> Heritage 	<ul style="list-style-type: none"> State Heritage
<ul style="list-style-type: none"> Flood Hazard 	<ul style="list-style-type: none"> Low hazard area; Medium Hazard area; High hazard area.
<ul style="list-style-type: none"> Regional Infrastructure 	<ul style="list-style-type: none"> Major Infrastructure and hazardous facilities – Water supply pipeline 20m buffer.

6.6 Category of Development and Assessment

6.6.1 Category of Development

There are three categories for development under the Planning Act. These are Accepted Development, Assessable Development and Prohibited Development.

The City Plan, acting as the Categorising Instrument, determines that the category of development for the proposed development is Assessable Development.

6.6.2 Category of Assessment

The Planning Scheme determines the Category of Assessment for the application. Under **Table 5.5.6** of the Character Residential Zone and **Table 5.5.13** of the Mixed-Use Zone an Other Change for a Material Change of Use to deliver a Hospital, Health Care Services and Food and Drink Outlet is **Impact Assessable**.

6.7 Assessment Benchmarks

6.7.1 Strategic Framework

Given this application is subject to Impact Assessment, the change application is required to be assessed against the entire Planning Scheme, including the Strategic Framework. The sections of the Strategic Framework considered most relevant to the assessment of this development application have been detailed in **Section 6.3**. A full response to the relevant assessment benchmarks is provided in **Appendix F**.

6.7.2 Relevant Codes

This Impact Assessable development application is to be assessed against the Planning Scheme to the extent relevant to the proposal. **Table 3** identifies the following codes that are most relevant to the assessment of the proposed development.

Table 3 – Applicable Townsville City Plan Codes

Primary Codes	Prescribed Secondary Codes	Overlay Codes
<ul style="list-style-type: none"> ▪ Character Residential (Workers Cottages) Zone Code ▪ Mixed Use Zone Code 	<ul style="list-style-type: none"> ▪ Landscape code; ▪ Healthy waters code; ▪ Transport impact, access and parking code; ▪ Works code. 	<ul style="list-style-type: none"> ▪ Flood hazard overlay code;

Notably, this change application seeks approval only for internal reconfigurations of the approved development's built form wholly contained within the Mixed Use zone. Demonstrating compliance against individual Acceptable Outcomes and/or Performance Outcomes is therefore not deemed to be relevant to the changes proposed by this application. The proposal continues to fulfill the outcomes intended to be achieved by the relevant assessment benchmarks. Notably, the proposed changes do not introduce a new land use, change approved development parameters beyond the number of beds provided and do not introduce new impacts warranting additional assessment.

The supporting material included in **Attachment D** and **Attachment E** are determined to sufficiently demonstrate continued compliance with the Acceptable Outcomes and/or the Performance Outcomes of the assessment benchmarks identified above.

7 Other Relevant Matters

7 Other Relevant Matters

Section 45 of the Planning Act provides for the assessment matters for different categories of assessment. For an application subject to Impact Assessment, these matters are:

An impact assessment is an assessment that –

(a) Must be carried out –

- i. Against the assessment benchmarks in a categorising instrument for the development; and*
- ii. Having regard to any matters prescribed by regulation for this subparagraph; and*

(b) May be carried out against, or having regard to, any other relevant matter, other than a person's personal circumstances, financial or otherwise.

Examples of another relevant matter –

- A planning need;
- The current relevance of the assessment benchmarks in the light of changed circumstances;
- Whether assessment benchmarks or other prescribed matters were based on material errors.

Within the legislative context, the proposal has been assessed and is considered to comply with, or substantially comply with, the applicable assessment benchmarks and ultimately will deliver an outcome that will provide many benefits to the local community and beyond.

The development application is subject to Impact Assessment and therefore the assessment manager may carry out assessment against, or having regard to, relevant matters other than the assessment benchmarks and matters prescribed by regulation. We consider that there are other relevant matters, as outlined below.

Whilst it is considered that there is compliance with, or substantial compliance with, the assessment benchmarks, relevant matters are identified below to demonstrate why in the current circumstances, a balanced decision in the public interest supports a decision to approve the development application.

7.1 Need Assessment

As mentioned in **Section 3**, the additional beds proposed in this application respond directly to the growing demand for health care services in Townsville since the original approval in 2020. The Applicant has prepared a Regional Capacity Need Memo, included in **Appendix G** of this application.

In summary, the detailed service planning and business modelling undertaken the by Applicant identifies the following:

- The demand for hospital beds in Townsville has increased as a result of population growth, ageing demographics and heightened pressure on the health system since the original approval in 2020;
- Notably, no additional hospital beds have been delivered in Townsville across both the public and private sector since 2020;
- Townsville University Hospital is consistently operating at high occupancy levels, particularly across surgical and inpatient wards;
- Inpatient pressures are evident across both the public and private sectors, particularly during seasonal peaks; and
- The recent sale listing of the Ramsay Health Care site, approved to deliver 36 inpatient beds, further increasing the demand for delivery of hospital beds at pace across Townsville.

These factors have contributed to more frequent bed occupancy pressures in both the private and public sectors, highlighting the immediate need for additional capacity and supporting infrastructure to meet both current and future growth.

7.1.1 Regional health care pressure

Townsville's health care sector is noted to service a catchment of over 250,000 people locally and an additional 700,000 across the broader North Queensland region. Both the public and private systems are noted to be operating under sustained pressure, with insufficient health care infrastructure delivery identified in the pipeline.

The Townsville University Hospital is noted to consistently operate at high occupancy levels, particularly across surgical and inpatient wards. Ongoing waitlist pressure for elective surgery across general surgery, orthopaedics, urology and related specialities continues to outgrow existing capacity.

Inpatient pressures are evident across both the public and private sector particularly during seasonal peaks and public hospital surges. The existing health care system in Townsville is simply inadequately equipped to meet the existing and future demand placed on the system.

The proposed additional beds allow for the Applicant to ensure that the development is delivered at a scale that reflects the commercial realities and genuine health care needs of Townsville and alignment with the needs of future operators.

7.1.2 The role of the private sector

To manage surgical backlogs across Queensland, the State continues to rely on private sector capacity. Importantly, the public and private hospital beds cannot be treated as interchangeable or serving the exact same need within the system. The public system typically accounts for most emergency coverage across the region, with the private sector primary operating on a scheduled system. Private health insurance penetration across the region is also noted to affect the capacity across the private sector and the need for addition bed provision within the local catchment area.

With delays in the Queensland Government's commitment to delivery more beds in regional hospitals, the Applicant has identified the opportunity to address this critical shortage through amendments to the internal fit out of the existing approval, which provides flexibility to accommodate a potential private sector operator.

7.1.3 Weststate Private Hospital

The proposed changes allow for the approved hospital to be more than a standalone private hospital and provide more flexibility for potential operators (both private and public). It allows for the Weststate Private Hospital to work in conjunction with other health care facilities and hospitals in the region by operating as a genuine regional surgical hub absorbing overflow from the public system during periods of peak demand. The provision of additional beds provides a meaningful additional capacity to respond to population growth, meet inpatient demand generated by general surgery and support sustained theatre utilisation growth across both sectors.

8 Conclusion

8 Conclusion

Urbis has prepared this Other Change Development Application on behalf of *CHPF South Bunbury Pty Ltd* to deliver increased hospital beds within the approved built form in order to meet the growing demand for healthcare services across Townsville and North Queensland more broadly. This application seeks an Other Change to an existing Development Approval for Material Change of Use for Hospital (22 beds), Health Care Services and Food and Drink Outlet. The proposed changes to the development scheme are being requested subsequent to increased market demand and tenant interest, which have identified necessary changes to enable design improvements, viability of the construction phase, and overall improved health care provision for future tenants.

This report provides a full assessment of the proposed changes against the Planning Scheme and confirms that the development, including the proposed changes, will continue to achieve compliance with the relevant assessment benchmarks applicable to the development.

The following key points are highlighted in support of the proposal and demonstrates that the proposed changes will continue to deliver a high-calibre outcome:

- The proposed changes to the approved development are consistent with the Planning Scheme provisions, particularly the themes and outcomes of the strategic framework, purpose, overall outcomes and the application of zone code provisions.
- The proposed changes are generally consistent with the previous approval. The development continues to deliver a Hospital and Health Care Service led scheme, supported by ancillary Food and Drink Outlet and Pharmacy uses. The proposal intends solely to reconfigure the internal layout of the approved and largely delivered building footprint at the site.
- The proposed changes, contained within the existing built form, continues to ensure that the development complements its surrounding land use, context and maintains the overall amenity of the area.

Council's approval of the application is therefore sought, subject to relevant and reasonable conditions.

Disclaimer

This report is dated 14 April 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of CHPF South Bunbury Pty Ltd (**Instructing Party**) for the purpose of Other Change Application (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A – DA Forms

Appendix B – Property Searches and Owner’s Consent

Appendix C – Architectural Plans

Appendix D – Traffic Impact Statement

Appendix E – Infrastructure Memo

Appendix F – TCC and SDAP Assessment Benchmarks Responses

Appendix G – Regional Capacity Need Memo



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