

SARA reference: 2504-45454 SRA
 Applicant reference: 25677
 Council reference: MCU25/0013

28 April 2025

The Busy School
 C/- Bespoke P&D
 PO Box 5032
 ALEXANDRA HILLS QLD 4161
 rhett@bespokepd.com.au

Attention: Ms Tamara Katai

Dear Ms Katai

SARA information request - 153-157 Dalrymple Road, Garbutt

(Given under section 12 of the Development Assessment Rules)

This notice has been issued because the State Assessment and Referral Agency (SARA) has identified that information necessary to assess your application against State code 1: Development in a state-controlled road environment (State code 1) and State Code 6: Protection of state transport networks (State code 6) of the State Development Assessment Provisions (SDAP v3.2) has not been provided.

Active Transport Access to Urban Bus Stops

1.	<p><u>Issue:</u></p> <p>The Traffic Impact Assessment, prepared by Velocity Traffic Engineering, dated 26 February 2025, anticipates that the school will have a high modal share of urban bus services, potentially up to 50%. However, there is a lack of active transport infrastructure to allow for safe, direct and convenient access between the school building entry and the closest bus stop pair, 'Bayswater Road at Pilkington Street, Garbutt' (ID: 890020 and ID: 890071). This includes a lack of paved footpaths in Dalrymple Service Road and Bayswater Road, no convenient pedestrian crossing arrangements across Bayswater Road, and obstructions to movement in Dalrymple Service Road, such as drains, open gates, car parking, power poles and landscaping. Students will also have to walk through vehicle circulation areas to access the verge of Dalrymple Service Road.</p> <p>This is likely to lead to random crossings of Bayswater Road, increased vehicular/pedestrian conflict and place a higher reliance on other transport modes.</p> <p><u>Action:</u></p> <p>Provide a revised RPEQ-certified traffic information and revised Site Plan to demonstrate compliance with PO26–PO30 and PO35 of State code 6 that addressed the following:</p> <p>(i) Revise the Site Plan to show safe, direct and convenient pathways:</p>
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	<ul style="list-style-type: none"> • between the entry of the school building and the Dalrymple Service Road verge, • between bicycle, scooter and skateboard parking and the entry of the school and the Dalrymple Service Road, noting that students using these modes may also use urban bus services. • Preferably, pathways should be separated from vehicle circulation areas or pedestrian priority treatments used (please refer to AS1742.10). <p>(ii) Demonstrate a safe, direct and convenient pedestrian route between the entry of the school building and each bus stop in the bus stop pair, 'Bayswater Road at Pilkington Street, Garbutt' (ID: 890020 and ID: 890071). This is likely to involve upgrades to active transport infrastructure in select places on the local road network in consultation with Townsville City Council. This should include a safe pedestrian crossing arrangement across Bayswater Road supported by an RPEQ-certified road safety audit.</p> <p>Alternatively, the private mini-bus services would need to increase to compensate for the lack of safe access to urban bus services. This may impact the size of the mini-bus setdown facility.</p> <p>For further guidance in planning and designing pedestrian networks for schools, please refer to Table 1: Active Transport and Schedule 1 of the <i>Planning for Safe Transport Infrastructure at Schools</i>, which is available at Queensland Road Safety Technical User Volumes (QRSTUV): Guide to Schools (Department of Transport and Main Roads).</p>
Mini-Bus Setdown Facility	
2.	<p>Issue:</p> <p>Alternative pathway schools, such as the Busy Schools, require a mini-bus setdown facility as indicated in the Traffic Impact Assessment, prepared by Velocity Traffic Engineering, dated 26 February 2025. However, the Traffic Impact Assessment and Site Plan, prepared by Pacifik Design Studio, dated 25/02/2025, sheet #02, have not demonstrated a safe and fit-for-purpose school bus setdown facility. The Dalrymple Service Road verge is constrained by a drain, sloping topography, power pole and landscaping, and this frontage will experience competing demands for private vehicle drop-off/pick-up. The on-site car park does not include a dedicated minibus set-down facility.</p> <p>The Traffic Impact Assessment's proposal that mini-buses will park on the Dalrymple Service Road frontage or reverse into the shared zone for people with disability (PWD) car park is not supported.</p> <p>Action:</p> <p>Provide revised RPEQ traffic information and a revised Site Plan to demonstrate compliance with PO26–PO31 and PO35, Table 6.3 of State code 6 and Department of Transport and Main Roads' (DTMR) technical guideline <i>Planning for Safe Transport Infrastructure at Schools</i>, which is available at: https://www.tmr.qld.gov.au/Safety/School-road-safety/Safe-school-travel-safest/School-environment-safety that addresses the following:</p> <p>(i) Revise the Site Plan to provide a dedicated mini-bus setdown facility that includes:</p> <ul style="list-style-type: none"> • adequate mini-bus parking capacity (number of buses that can concurrently park) to cater for the demand for am and pm school bus services, considering constraints such as lack of safe active transport access to urban bus services and a shortfall in car parking, • a design which accommodates the maximum design vehicle, which could

	<p>include a 22-seater mini-bus, depending on demand,</p> <ul style="list-style-type: none"> • provision of mini-bus parking parallel to the kerb with left-hand side boarding to allow for safe and convenient loading and unloading of passengers and disability compliant access. Bus parking should comply with <i>the Disability Standards for Accessible Public Transport 2002</i> made under subsection 31(1) of the <i>Disability Discrimination Act 1992</i>, and • appropriate support infrastructure such as a waiting area of adequate dimensions for the anticipated number and dwell time of students, a boarding point, shelter, seats and a bin. <p>(ii) Provide a swept path analysis of the maximum design vehicle entering the bus zone, pulling up parallel to the kerb and exiting the bus setdown facility. Mini-buses should move in a forward direction at all times. The swept path analysis should also demonstrate that vehicles and mini-buses in the car park have independent operation, that is, car parking aisles are not blocked.</p> <p>(iii) Clarify whether the educational establishment will use private/contracted mini-bus services or whether the school will own and operate mini-buses for school services. If the educational establishment owns buses, provide lay-by bus parking on the site for private school buses when not in use. This should be away from car parking and passenger loading areas.</p> <p>(iv) Demonstrate that the mini-bus setdown facility and any lay-by parking is separate from private vehicle car parks, PWD parking and drop-off/pick-up facilities to avoid conflict between vehicle types and maximise the safety and efficiency of school bus services. This can include the time of operation separation.</p> <p>(v) Provide a safe, direct and convenient pedestrian path between the entry of the school and the mini-bus setdown facility that does not involve crossing vehicle circulation or car parking areas.</p>
Bicycle/Skateboard/Scooter Parking	
3.	<p><u>Issue:</u></p> <p>The Site Plan, prepared by Pacifik Design Studio, dated 25/02/2025, sheet #02, shows provision for 12 bicycle parking racks within a vehicle circulation/manoeuvring area and separated from the entry of the school by car parking. There is no pathway connection to the entry of the school or the Dalrymple Service Road reserve, and no provision for scooter/skateboard parking.</p> <p><u>Action:</u></p> <p>Provide revised RPEQ traffic information and a revised Site Plan to demonstrate compliance with PO30 – PO31 and PO35, Table 6.3 of State code 6 and DTMR technical guideline <i>Technical Note 207, Planning for Safe Transport Infrastructure at Schools – Bicycle Parking</i>, which is available at: https://www.tmr.qld.gov.au/Safety/School-road-safety/Safe-school-travel-safest/School-environment-safety.</p> <p>In particular, a revised Site Plan should be provided demonstrating the following:</p> <ul style="list-style-type: none"> • Bicycle parking is provided in a safe and convenient location for the cyclist's ride up to the school and entry to the school building that avoids conflict with vehicle circulation and parking areas. • Scooter parking spaces and a skateboard parking rack are provided in addition to bicycle parking, as these may be used by students in the cycle-up catchment or using

	<p>public transport, and</p> <ul style="list-style-type: none"> Those riding to the school and parking do not need to cross vehicle circulation and car parking areas to enter the school; that is, such facilities are located near the entry to the building. Alternatively, pedestrian priority treatments should be provided to adequately separate students and vehicles. Please refer to AS1742.10.
Environmental emissions - Noise	
4.	<p><u>Issue:</u></p> <p>Applications proposing a sensitive use in proximity to a state-controlled road must demonstrate that traffic noise impacts on the proposed development can be mitigated to meet noise criteria. State code 1 establishes the maximum noise criteria that should not be exceeded in new sensitive developments. These noise criteria ensure that individual and community health, wellbeing and amenity are protected and not adversely impacted.</p> <p>The proposed development must meet the maximum building envelope acoustic level referenced in Table 1, Item 1.2 of State code 1. DTMR's assessment of the application indicates that the facade noise criteria of ≤ 58 dB(A) identified in Table 1.2 of State code 1 will likely be exceeded. Additionally, to demonstrate compliance with PO46 of State code 1, the development must achieve the maximum internal acoustic level of ≤ 35 dB(A) referenced in Table 3, Item 3.2, to comply with PO46 and PO48 of State code 1.</p> <p>The application material does not provide any details of how these noise impacts will be mitigated through physical barriers or alternative noise mitigation measures. Therefore, compliance with the above criteria is considered not to have been met.</p> <p><u>Action:</u></p> <p>Provide a Noise Impact Assessment report demonstrating that the proposed development will not have noise and vibration implications from the nearby State-controlled road corridor. The noise assessment should be conducted in accordance with the Transport Noise Management Code of Practice, allowing for a 10-year planning horizon.</p>

How to respond

You have three months to respond to this request, and the due date to SARA is 28 July 2025.

You may respond by providing either: (a) all of the information requested; (b) part of the information requested; or (c) a notice that none of the information will be provided. Further guidance on responding to an information request is provided in section 13 of the [Development Assessment Rules](#) (DA Rules).

It is recommended that you provide all the information requested above. If you decide not to provide all the information requested, your application will be assessed and decided based on the information provided to date.

You are requested to upload your response and complete the relevant tasks in [MyDAS2](#).

As SARA is a referral agency for this application, a copy of this information request will be provided to the assessment manager in accordance with section 12.4 of the DA Rules.

If you require further information or have any questions about the above, please contact Zinal Chand, A/Planning Officer, on (07) 3432 2410 or via email NQSARA@dsdilgp.qld.gov.au, who will be pleased to assist.

Yours sincerely



Anthony Walsh
Manager Planning

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

Development details	
Description:	Development permit Material change of use for Educational Establishment
SARA role:	Referral Agency
SARA trigger:	<ul style="list-style-type: none"> Schedule 10, Part 9, Division 4, Subdivision 1, Table 1, Item 1 (10.9.4.1.1.1) of the Planning Regulation 2017 - Development impacting on state transport infrastructure Schedule 10, Part 9, Division 4, Subdivision 2, Table 4, Item 1 (10.9.4.2.4.1) of the Planning Regulation 2017 - Material change of use of remises within 25 metres of a State-controlled corridor (road) (Planning Regulation 2017)
SARA reference:	2504-45454 SRA
Assessment criteria:	State code 1 & 6 of SDAP v3.2