

SARA reference: 2606-52913 SRA
Applicant reference: 25544-190-1
Council reference: MCU26/0040

14 July 2026

ODG North Shore T1 Pty Ltd
c/- Brazier Motti
Anne.Zareh@braziermotti.com.au

Attention: Ms Anne Zareh

Dear Ms Zareh

SARA information request – Material change of use for a Shopping centre at 13 Market Street, Burdell

(Notice issued under section 12 of the Development Assessment Rules)

The State Assessment and Referral Agency (SARA) has undertaken a preliminary review of the material provided in support of the above referenced application which was deemed properly referred on 23 June 2026.

From this review, SARA has identified a range of matters relating to State code 6: Protection of state transport networks of the State Development Assessment Provisions.

1. Consistency with original approvals and potential impact on state transport network

The Traffic Impact Assessment (TIA) prepared by SLR, dated 27 February 2026, ref 620.041996.00002 and rev. 01, does not include a complete copy or comparison of the original approvals. As a result, SARA is unable to confirm whether the proposed development is consistent with the original approvals and will not adversely impact the state transport network.

Further information is therefore required to demonstrate that the proposed development does not exceed the yields specified in the original plan of development and infrastructure agreement.

If the proposed development exceeds the approved yields, the following key issues must be addressed.

- **Traffic distribution assumptions:** The assumption that only 15% of external trips will approach from the south (via the Bruce Highway) is considered unrealistic and lacks detailed justification. Further clarification and justification of the external traffic distribution methodology is required.
- **Saturday peak period assessment:** A Saturday peak period assessment given the use is a Shopping centre.
- **Impacts on the state transport network:** An assessment of the impacts on the state transport network. Of particular concern is North Townsville Road (Woolcock Street) and the North Townsville Road/North Shore Boulevard intersection, which already experience capacity and safety issues.

Response requested:

Please provide the following:

- **Consistency with original approvals:**
 - o Provide a complete copy of the original approvals and verify that the proposed development is consistent with the original plan of development and infrastructure agreement, including allowable yields and conditions of approvals.
 - o Demonstrate that the proposed development does not exceed the land use allocation or traffic thresholds established in the original approvals.

Alternatively, if the proposed development is inconsistent with the original approvals, submit an amended TIA that:

- **Traffic distribution assumptions:**
 - o Provides detailed justification for the external traffic distribution assumptions, particularly the 15% trip distribution via the Bruce Highway (North Townsville Road).
 - o Clarifies the methodology and data sources used to determine the external traffic distribution proportions.
- **Saturday peak period assessment:**
 - o Includes a Saturday peak analysis to account for the expected traffic generation during weekend peak periods.
- **Impacts on the state transport network:**
 - o Includes a broader traffic impact assessment, including key intersections on the state transport network (e.g. North Townsville Road/North Shore Boulevard, Bruce Highway/Ingham Road intersection and all other relevant road upgrades as identified in the infrastructure agreement).
 - o Provides a SIDRA analysis for the year of opening and a 10-year design horizon, including staging (if applicable).
 - o Demonstrates how the proposed development avoids, minimises, or mitigates impacts on the state transport network, particularly at the North Townsville Road/North Shore Boulevard intersection, Bruce Highway/Ingham Road intersection and all other relevant road upgrades as identified in the infrastructure agreement.
 - o Identifies any required mitigation measures or upgrades, including concept designs, swept paths, and land dedication (if applicable).

How to Respond

In accordance with section 13 of the Development Assessment Rules (DA Rules), you have three months to respond to this Information Request. The due date of a response to SARA is **14 October 2026**.

You can choose to respond to all, some, or none of the matters raised in this notice.

If you decide not to respond to the matters raised, SARA will finalise its assessment on the material provided to date in support of the application.

It would be appreciated if you would provide your response to SARA using the 'manage documents' function in [MyDAS2](#).

If you require further information or have any questions about the above, please contact Ms Amanda Hosken on (07) 5644 3216 or via email CairnsSARA@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fletcher Smith', written in a cursive style.

Fletcher Smith
Principal Planning Officer, Planning Services (SEQ South)

cc City of Townsville Council, enquiries@townsville.qld.gov.au