

Our Ref: NCD-012-22

05 June 2025

Chief Executive Officer, Townsville City Council
TOWNSVILLE QLD 4810

Attention: Planning and Community Engagement

RE: MCU22 0026.01 and DWB22 0007.01

Dear Sir/Madam

CHANGE TO DEVELOPMENT PERMIT - ROOMING ACCOMMODATION (Extension – 7 rooms)
1-5 Staggpole Street, West End, 4810 (LOTS 169 and 170 on EP 2263)

This letter is being provided in conjunction with the Form 5 Change Application and Development Application Form 2 and revised drawings provided 25 April 2025. The change the Development Approval is a reduction from 16 new rooms to 7 new rooms and retention of a building that was previously planned to be demolished.

The proposed development will provide 25% of residents access to a private ensuite, improving outcomes for residents. Currently the majority of exiting rooms do not have an ensuite.

The reason for the Change Application is high construction costs resulting in reduced viability in the larger extension previously planned. The revised application proposes building work be carried out in two separate stages, with each stage shown on the drawings.

The development will improve safety and security for the residents at Townsville Guesthouse. This property has provided continuous share accommodation for 60 years, and has been operating as a Level 1 Service for the past 16 years.

I understand Council will contact me for any further information or clarifications that may be required to support this application.

Yours faithfully,



Damian Dryden

BEng (Civil), CPEng, MIEAust, NER, IntPE (Aust)

This letter should be read in conjunction with the following documents previously provided:

Planning Act Form5		
DA Form2		
Drawing 7138/1	Site Analysis Plan	Rev C
Drawing 7138/2	Site Plan	Rev C
Drawing 7138/3	Typical Room Layout	Rev C
Drawing 7138/4	Floor Plans	Rev C
Drawing 7138/5	Elevations	Rev C

CHANGE TO DEVELOPMENT PERMIT - ROOMING ACCOMMODATION
(7 additional rooms)

MCU22 0026.01 and DWB22 0007.01

on land at

1-5 Staggpole Street, West End, Townsville, 4810

described as

Lots 169 and 170 on EP2263

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1. Overview

The property at 1-5 Stagpole Street, West End, described as Lot 169 and 170 on EP 2263 has operated as rooming accommodation since 1962. In 2006 the property became a Level 1 Registered Accommodation Service in accordance with the Residential Services (Accreditation) Regulation 2002.

As described in the Minters letter, private accommodation services play a critical role in safe and secure accommodation for locals, particularly people who for one reason or another find themselves without permanent self-contained accommodation.

Furthermore, the State and Federal Governments have recognised the increased health risk that the Covid-19 pandemic brings to vulnerable people, and an increased risk of people becoming homeless.

The Ministers letter encourages registered accommodation providers investment in their properties to improve residents ability to have private access to bathrooms and security over their own space.

This letter has been prepared by the Applicant seeking change to the Development Permit for and extension to the existing rooming accommodation complex. The changes include

- Reduction from 16 new rooms to 7 new rooms
- Reduction in building height from two-story to single story
- Retention of six existing rooms (had been planned to be demolished)

The property currently consists of four separate buildings that combine to provide an accommodation service with 23 private rooms. These buildings were constructed between 1887 and 1962. The proposed new buildings will increase the total number of rooms to 30.

2. The Site

The subject site is located at 1-5 Stagpole Street, West End and is described as Lots 169 and 170 on EP 2263.

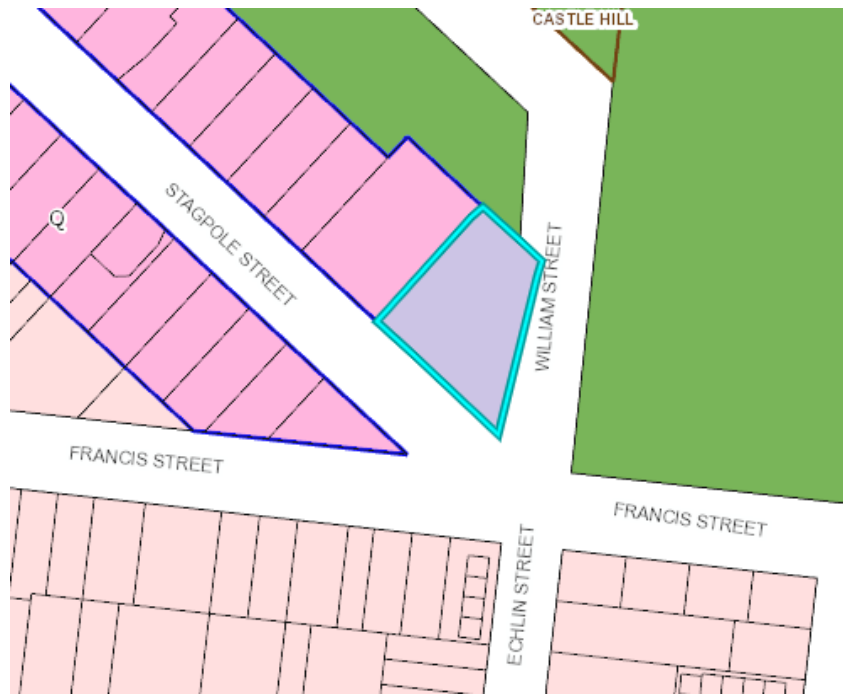
The site has a total land area of 2,974m² and contains four separate buildings constructed between 1897 and 1962. The property is a registered and accredited accommodation service, Level 1, trading as 'Townsville Guesthouse'.

The property has had different uses over the 123-year history. The largest building was constructed in 1897 as a private residence. The property was sold in 1925 and converted to a small private hospital.

In 1945, while still operating as a private hospital, the second largest building was constructed. The property sold in 1962 and converted to residential accommodation by the new owners. The change to accommodation included construction of two more smaller buildings at the rear of the property. The property has remained as residential accommodation with no further development, since the early 1960's.

The site has 65m street frontage to Stagpole Street and 65m frontage to Old Quarry Road (shown as William Street on some plans). *Figure 2.1* below shows the Location Plan. The property is an accredited accommodation service, Level 1, for 30 residents. It was registered under the Residential Service Accreditation Act by the current owner in 2006.

Figure 2.1 Location Plan for 1-5 Stagpole Street



An aerial view of the property and immediate surrounds is shown in *Figure 2.2* below. The property is located at the foot of Castle Hill and with easy access to local shops, bus routes and hillside walking tracks.

Figure 2.2 Aerial image of Townsville Guesthouse location



The certificates of title confirming ownership of the subject site by the Applicant and the registered Survey Plans for the subject site were provided with the initial application.

The site is included within the City Plan Character Residential Zone and has only one neighboring property. The neighboring property, 7-9 Stagpole Street, is a rehabilitation/ healthcare facility. Castle Hill State Park adjoins the rear boundary (north-east), Echlin Street Quarry Reserve and Old Quarry Road are on the south-east side of the property.

3. Development Proposal

The applicant proposes to construct two small buildings to the rear of the property, one with three rooms and one with four rooms. These will be adjacent to an existing building consisting of six bedrooms and laundry.

The proposed use for this site is defined as *Residential Accommodation* under the Townsville City Plan.

The proposed new rooms are located at the rear of the property, with access via Old Quarry Road (William Street Road Reserve). The proposal is shown in detail in the Development Plans previously submitted.

Figure 3.1 below shows the location of the proposed new building in relation to the other buildings on the site and to site boundaries.

Figure 3.1 Site Analysis Plan

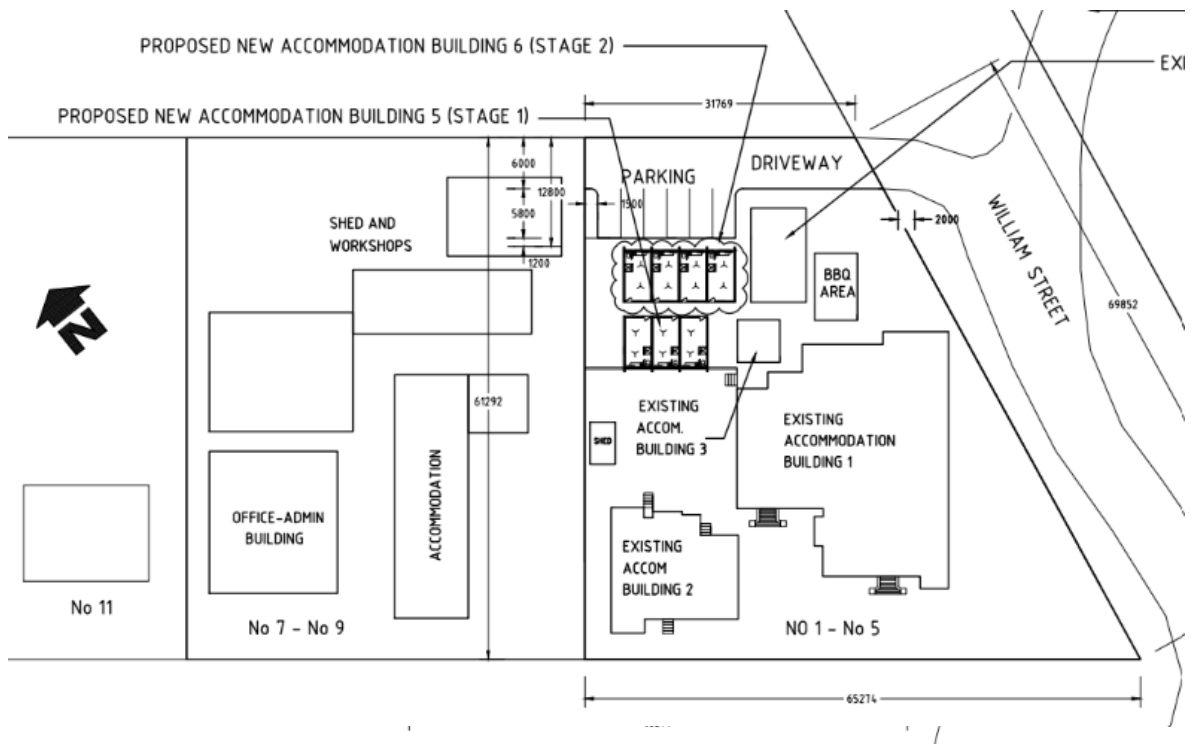
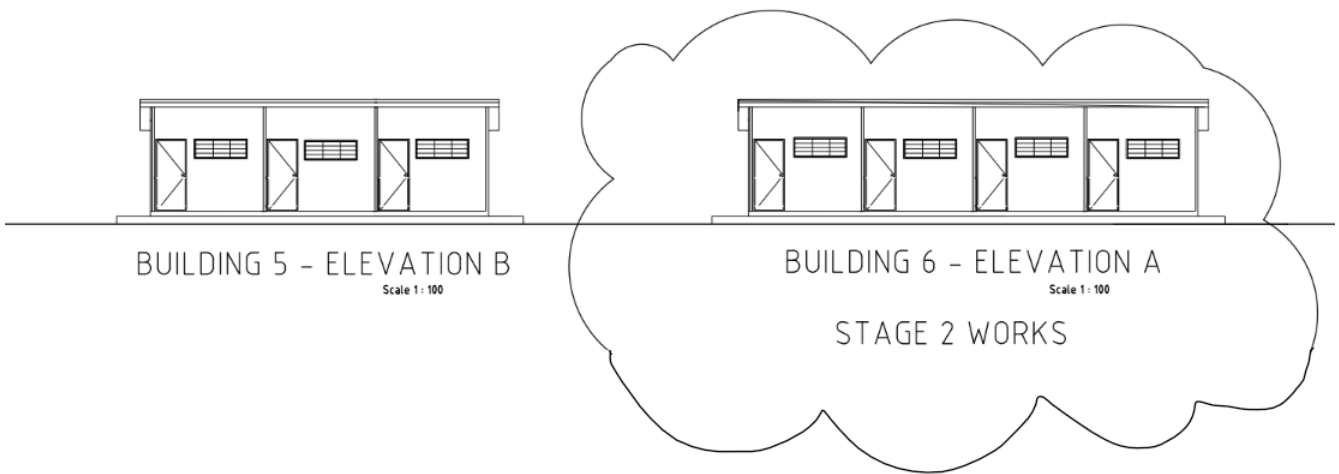


Figure 3.2 shows the front elevation of the guesthouse extension. The floor plans are shown in Figure 3.3 further below. The proposed building is Class 2A with single level habitable floorspace. The maximum building height is 4m. The proposed buildings will be constructed of concrete for improved sound attenuation, wind resistance and fire protection. It has a contemporary appearance and climate responsive design.

Figure 3.2 Front view of the new buildings (not street view)



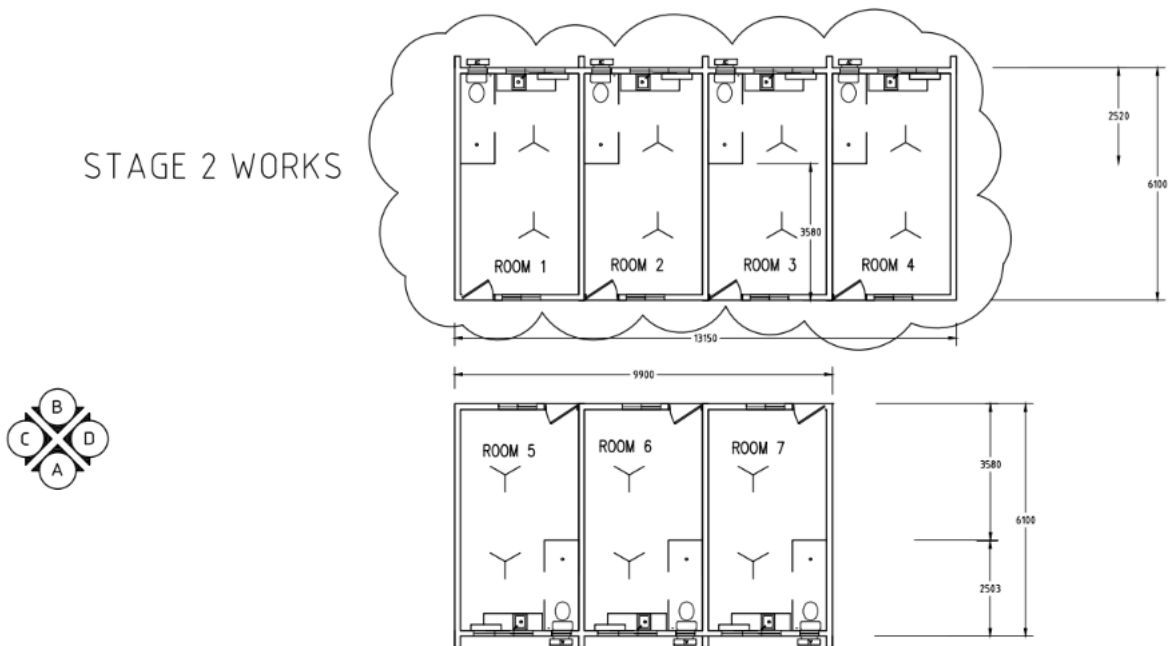
Building 5 (first new building) will incorporate the following:

- 3 bedrooms (inc 1 with mobility access)
- Undercover pedestrian access

Building 6 (first new building) will incorporate the following:

- 4 bedrooms (inc 1 with mobility access)
- Undercover pedestrian access

Figure 3.3 Floor Plan



Landscaping

The property is already extensively landscaped with a wide variety of native trees and shrubs, plus fruit trees and lawns. There are shaded garden areas with tables and chairs. The proposed new buildings increases the overall building footprint by 3 percent. The total landscaped area is approximately 1,500m² covering 50% of the overall site area.

Transport Impact

The proposed development is expected to have no impact on traffic conditions. Many guesthouse residents rely on public transport and or use bicycles, taxi's or scooters. The proposed development provides for 7 extra residents, adding only a few extra cars and only a few extra vehicle movements per day. Residents have access to busses with bus stops close by on Ingham Road and Cowley Street.

The Ingham Road bus route goes directly to the city and Cowley Street bus route goes to Stockland and outer suburbs. The property is a short distance from Castletown Shopping Center and walking distance to local shops.

Parking

There are six on-site car parks and significant street-side parking on Echlin Street Quarry Road (William Street) with 65m property boundary with no neighboring property. There is further street side parking available on Stagpole Street, also with 65m property boundary.

As per above, many guesthouse residents rely on public transport and or use bicycles, taxi's or scooters.

Water, Sewer, Electricity and Telecommunications Infrastructure

The subject site is serviced by a water main and sewer along the Stagpole Street frontage. Existing sewer infrastructure traverses to the rear of the site servicing existing bathrooms and toilets. The proposed extension can be readily connected to the existing services. Electricity and internet services are connected to the property from Stagpole Street and connections will be extended to new bedrooms.

Flood Level

The property is identified as not being affected by the highest impact flood hazard overlay.

Stormwater

Stormwater runoff from the property is free draining onto William Street (Echlin Street Quarry access road) and Stagpole Street. As one of the proposed new building replaces an existing concrete area, there will be minimal change to hard surface areas on the property. The applicant will provide stormwater drainage plans at future operational works stage.

Waste Management

The property is serviced by Townsville City Council. An industrial bin is collected twice per week and recycling bins are collected each fortnight. It is expected that there will be a small increase in the size of the industrial bin and one extra recycling bin will be required. The changes to waste collection bins would be confirmed at completion of development and adjusted if required.

4 RELEVANT LEGISLATION

4.1 COMMONWEALTH LEGISLATION

The application is not subject to assessment against Commonwealth legislation. It is not anticipated that development of this land will trigger assessment against the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC), as it is not anticipated that the development will significantly impact upon a matter of national environmental significance.

4.2 THE PLANNING ACT 2016

The *Planning Act 2016* provides the framework for coordinating local, regional and state planning. Given the nature of the development, the application requires assessment against this legislation.

4.3 STATE ASSESSMENT AND REFERRALS

The application does not trigger referral for any State matters.

4.4 STATE PLANNING POLICY

It is not considered that separate assessment of the proposal against the provisions of the SPP is required given that all relevant matters are dealt with under the provisions of the planning scheme and are assessed as part of the overlay assessment.

4.5 NORTH QUEENSLAND REGIONAL PLAN

The proposed site is located within an urban area identified in the NQ Regional Plan and the development is consistent with the outcomes of the NQ Regional Plan.

4.6 ASSESSMENT MANAGER AND PLANNING SCHEME

Townsville City Council is nominated as the assessment manager for the application. The applicable planning scheme is the *City Plan 2014*.

4.7 PUBLIC NOTIFICATION

The proposed development is code assessable and requires public notification.

5 THE PLANNING FRAMEWORK

5.1 THE TOWNSVILLE CITY COUNCIL PLANNING SCHEME – CITY PLAN 2014

The proposed development is assessable under the Townsville City Plan 2014.

5.2 PLANNING SCHEME DESIGNATIONS

In accordance with the Townsville City Plan 2014, the site is subject to the designations shown below in *Figure 5.1*. A full list of designations is shown in Zoning Table 1. These designations are used to determine applicable Tables of Assessment for the proposed development on the subject site and therefore determine the Category of assessment and the Codes that apply.

Figure 5.1 Planning Scheme Zoning Designations

1 - 5 Stagpole Street WEST END QLD 4810

Address:	1 - 5 Stagpole Street WEST END QLD 4810 Property Number: 43900 Status: C Ward: 0312500000
Title(s):	Lot 169 EP 2263 Land Area: 1740.00 SQ.M Lot 170 EP 2263 Land Area: 1234.00 SQ.M

Location Applications Zoning Mobile Show All

Zoning

Townsville City Plan	Zone: >> Character residential zone
Parcel: 50730	Precinct: >> Queenslanders precinct
	Sub precinct: Not applicable
	Plans of development or other plans: Not applicable
	Priority infrastructure plan: >> This property is within a Priority Infrastructure Area
	Overlay(s): >> Bushfire hazard Overlay Map OM-02 - High bushfire hazard area >> Airport Environs Overlay Map OM-01.1 - Operational airspace - Airspace more than 15m above ground level >> Airport Environs Overlay Map OM-01.5 - Light intensity - 6km radius >> Airport Environs Overlay Map OM-01.2 - Wildlife hazard buffer zones and Public safety areas - Distance from airport runway - 8km >> Heritage Overlay Map OM-04.1 to OM-04.4 - Cultural heritage - Heritage character - Local heritage >> Development Constraints Overlay Map OM-07.1 - Landslide hazard - Low
	Information Purposes: Not applicable

Table 5.1: Planning Scheme Designation

TYPE OF DESIGNATION	DESIGNATION
ZONE	Residential
PRECINCT	Queenslander Precinct
LOCAL AREA	Not applicable
AIRPORT ENVIRONS OVERLAY	Identified within the Operational Airspace overlay OM-01.1 - Operational airspace more than 15m above ground level OM-01.5 Light intensity 6km radius OM-01.2 Wildlife hazard buffer zone and public safety areas – Distance from airport runway - 8km
BUSHFIRE HAZARD OVERLAY	Identified within Bushfire Hazard overlay OM-02 - High bushfire hazard area
COASTAL PROTECTION OVERLAY	Not applicable
HERITAGE OVERLAY	Identified in the Heritage overlay OM-04.1 to OM-04.4 Cultural heritage – Heritage character – Local heritage
EXTRACTIVE RESOURCES OVERLAY	Not applicable
FLOOD HAZARD OVERLAY	Not applicable
Landslip Overlay	Identified in Landslip hazard overlay OM-7.1 Landslip Hazard - low
NATURAL ASSETS OVERLAY	Not applicable
WATER RESOURCE CATCHMENT OVERLAY	Not applicable

5.3 LEVEL OF ASSESSMENT, ASSESSABLE BENCHMARKS & APPLICABLE CODES

The subject land is designated within the *Character Residential Zone, Heritage Overlay, Airport Environs Overlay, Landslip Hazard Overlay* and *Bushfire Hazard Overlay*. The relevant table of assessment within the Townsville City Plan (2014) identifies the Material Change of Use as Assessable Development and is Code Assessable.

Furthermore, the Assessment Tables identify that an application for Material Change of Use requires assessment against the following Codes:

- Healthy Waters Code;
- Landscape Code;
- Transport Impact, Access and Parking Code;
- Works Code;
- Airport Environs Overlay Code;
- Bushfire Hazard Overlay Code;
- Cultural Heritage Code; and
- Landslip Code.

A complete assessment of the proposal against the relevant provisions of the applicable Codes is discussed below.

5.5 DEVELOPMENT CODES

5.5.1 Healthy Waters Code

The purpose of the Healthy Waters Code is to ensure developments manages stormwater and wastewater as part of the integrated total water cycle and in ways that help protect the environmental values specified in the *Environmental Protection (Water) Policy 2009*.

Response

The development is the continuation of the existing residential land use and there is no anticipated generation of contaminants as a result of this development. The site currently discharges run-off to Council's stormwater network. The footprint for the new buildings in part overlay an existing concrete area and change in impervious area is negligible. There are no changes to stormwater flow paths, surface levels or types of surface on the remainder of the site. The remainder of the site is well developed with vegetation including trees, shrubs and lawns. The development is not anticipated to cause adverse effects on stormwater quality, stormwater flow, receiving waters and wastewater impacts within the local area. The development is therefore considered to be consistent with the overall outcomes and performance outcomes of the Healthy Waters Code. It is anticipated that a stormwater management plan will be provided as part of future operational works.

5.5.2 Landscape Code

The purpose of the Landscape Code is to ensure landscaping in both the private and public domains is designed and constructed to a high standard, provides a strong contribution to the city image, is responsive to the local character, site and climatic conditions and remains fit for purpose over the long- term.

Response

The property has gardens established over many years. Approximately 50% of the site is landscaped, primarily with dry tropics trees and shrubs. The property also has a large mango tree estimated to be 100 years old and Royal Palms over 25 years old. No trees >3m will be removed as a result of the development and there are only minor changes to existing garden beds under the development. The above assessment demonstrates overall compliance with the purpose of the code and a detailed assessment against the code is not warranted.

5.5.3 Transport Impact, Access and Parking Code

The purpose of the Transport Impact, Access and Parking Code is to ensure appropriate provision for transport and end of trip facilities, and to facilitate, as far as practicable, an environmentally sustainable transport network.

Response

The proposal is considered consistent with the purpose and overall outcomes of the Transport Impact, Access and Parking Code. There will be negligible change to daily traffic movements. Vehicular site access is via Echlin Street Quarry access road (William Street) which is a no through road. There are no other property access on this section of road. Pedestrian access is via Stagpole Street or via Echlin Street/ Quarry access road.

The proposed development is expected to have no impact on traffic conditions. Many guesthouse residents do not have cars. The proposed development provides for 7 extra residents, many of whom will not have cars. Residents have access to busses with bus stops for two separate bus routes close by. These are within 300m and are on Ingham Road and Cowley Street. The Ingham Road bus route goes directly to the city and Cowley Street bus route goes to Stockland and outer suburbs. The property is also only 1km from Castletown Shopping Center and a number of corner stores and local shops are within 500m.

Parking

There are six on-site car parks and significant street-side parking on Echlin Street Quarry Road (William Street) with 65m street frontage. There is further street-side parking available on Stagpole Street, also with 65m street frontage. With only one adjoining property, there are no properties competing for parking spaces on these street frontages. Some residents own motorbikes, three onsite parking spaces are urgently provided.

Current and past residents have owned and utilised bicycles for transport, and in recent times a few residents have owned scooters. E-scooters are also available for hire, often parked directly outside the Guesthouse on Stagpole Street, and are useful for trips to local shops or into the city. With Castletown shops only 1km away, residents will also use a taxi to bring groceries home when shopping for more than a few items.

Therefore the development is considered consistent with the overall outcomes, performance outcomes and acceptable outcomes of the code. The above assessment demonstrates overall compliance with the purpose of the code and a detailed assessment against the code is not warranted.

5.5.4 Works Code

The purpose of the Works Code is to provide a level of infrastructure which is appropriate to the intended character and function of the site and creating a high expectation for community health, safety and amenity. The development provides suitable access and does not detract from the desired character, amenity, integrity or quality of the locality.

Response

The proposed development involves construction of new modern buildings with a total of seven bedrooms. Existing infrastructure is considered appropriate to service this extension. The new building will be connected to services that are currently available on site. Stormwater is already directed to a legal point of discharge and there will be no change to ground levels beyond the footprint of the new building.

The development is to the rear of the property and existing buildings, are being retained. There will be no change to street frontage appearance. While the new building is more contemporary in design, is not visible from Stagpole Street (main street frontage), or from Echlin Street (side street). The existing adjacent buildings at the rear of the property are constructed with fibro walls and metal roofs. The new building will have a significantly improved appearance, though only visible from within the property.

The proposed new building will have an enhanced appearance, with colorbond roof, and built to current codes and standards. This will improve the quality of accommodation for residents as well as enhance the amenity and integrity of the locality.

The development will not detrimentally impact upon environmental values or the character of the locality, and will facilitate a more efficient use of the site's area. Therefore, the proposal is considered to be generally consistent with the requirements of the Works Code, where applicable. The above assessment demonstrates overall compliance with the purpose of the code and a detailed assessment against this code is not warranted.

5.6 OVERLAY CODES

5.6.1 Airport Environs Overlay

The purpose of the Airport Environs Overlay Code is to ensure development does not negatively impact on the operations of the Townsville Airport, RAAF base or any other aviation facilities. Any development is to ensure that safety is maintained throughout the airport's operational airspace by reducing the effect of aircraft noise on people and minimising risk to public safety near airport runways.

The subject site is identified in Operational Airspace more than 15m above ground level and within the 6km airport light intensity radius.

The proposed new building will not exceed the building height limit envisaged for the zone and will not enter the operational airspace area. Further, the development does not generate gaseous plums, smoke, dust or ash. A detailed assessment against the code is not warranted. The development is considered consistent with the overall outcomes, performance outcomes and acceptable outcomes of the code.

5.6.2 Bushfire Overlay

The purpose of the Bush Fire Overlay code is to ensure development in the coastal zone is planned, designed, constructed and operated to avoid risk to people and property from coastal hazards and to manage the coast to protect coastal resources and allow for the natural fluctuations of coastal processes as far as possible.

Response

A portion of the property is identified within the Bush Fire Overlay code.

There is an existing 16m buffer zone between the property and the natural vegetation on Castle Hill. This is made up of 8m of predominately concrete (driveway and foot path) and a further 8m of maintained area between the property boundary and the natural vegetation.

The proposed new buildings will be designed and built in accordance with AS3959 Construction of buildings in bushfire prone areas. The new rooms will offer an improvement to safety and wellbeing of residents in the event of an adjacent bushfire.

A bushfire building plan would be included with construction drawings and a Bushfire Management Plan will be provided following approval of development application subject to conditions, or as requested by TCC.

5.6.3 Heritage Overlay Code

The purpose of the Heritage Overlay code is to ensure Heritage street scape is maintained

Response

The proposed new buildings are to the rear of the property, and there is no adjacent property on the rear boundary. Existing buildings are being retained. The street frontage buildings were constructed circa 1897 and 1945 and have colonial characteristics while the buildings at the rear of the property were constructed circa 1962 and are plain fibro structures. The new building will have a significantly improved appearance to the adjacent buildings at the rear, though generally only visible from within the property site boundary.

5.6.3 Slip Hazard Overlay Code

The purpose of the Slip Hazard Overlay Code is to manage development outcomes in slip hazard areas so that risk to life, property, community, economic activity and the environment during future

storm events is minimised, and to ensure that development does not increase the potential for damage on-site.

Response

Landslip stabilisation and barrier protection work has been carried out in the zone identified by the Overlay Plan. A rock barrier fence has been installed across the full length of the rear property boundary, and set back approximately 8m.

The proposed new building is located a further 4m away from the property boundary than the existing building (approx. 12m instead of 8m). The new building is to be constructed of concrete and without rear entry doors. This is a significant improvement on the current building.

6 CONCLUSION

This proposal details a Change to Development Permit from Townsville City Council for an extension to Rooming Accommodation (7 new rooms), on land described as Lots 69 and 70 on EP2263 located at 1-5 Stagpole Street, West End, 4810.

The proposed Change is recommended for approval based on the following reasons:

- The proposal complies with the codes nominated by the planning scheme as being relevant to the assessment of a proposal of this nature.
- The intended use is in character with the locality, ensuring amenity within the area will be maintained.
- The proposed development can be connected to all urban infrastructure services and stormwater can be managed appropriately.
- The proposed development is expected at this location and supported by the scheme.
- The proposal provides the opportunity for a small increase in density within an established location.
- The proposal will not result in a detrimental impact on the adjoining property.

In summary the proposed development is a use expected within the area and outcomes can be secured by standard conditions.