

Appointed reviewer statement template

Approved form MGR5.2 under the Planning Act 2016

First Compliance Check of the Townsville City Council Local Government Infrastructure Plan Amendment

Prepared by: Lau Chean-Piau



Version	Date	Reviewer name and signature
Final	3 July 2026	Lau Chean-Piau
		

1. Introduction

Lau Chean-Piau of 2EH Consulting has been engaged by Townsville City Council (Council) to undertake a first compliance check of the proposed amendment to its current Local Government Infrastructure Plan (LGIP). This review has been conducted in accordance with the requirements of the Planning Act 2016 (Qld) and the Minister's Guidelines and Rules (MGR) for the making and amending of local government infrastructure plans.

As the appointed reviewer, Lau Chean-Piau is required to:

- (1) evaluate whether the proposed LGIP amendment complies with the requirements of the Planning Act 2016 and the Minister's Guidelines and Rules, including:
 - (a) the schedule of works (SOW) model requirements in Schedule 7 of the Guidelines and Rules;
 - (b) the LGIP template;
 - (c) the approved form MGR5.1 – LGIP Review Checklist; and
- (2) comply with the fundamental ethical principles of integrity, objectivity, professional competence, due care and professional behaviour when reviewing the LGIP; and
- (3) provide a written statement and the completed checklist to the local government detailing the findings of the compliance check.

2. Scope exclusions

In accordance with standard practice for appointed reviewer compliance checks under the MGR, the following items are outside the scope of this review:

- Verification of the accuracy of individual inputs, source data or modelling parameters used in the preparation of the LGIP or its supporting technical studies.
- A detailed review of Townsville City Council's Long Term Financial Forecast (LTFF) or asset management plans (AMP), other than to assess the extent of their alignment with the LGIP and its underlying infrastructure assumptions.

3. Compliance check process

The process adopted for the first compliance check of LGIP Amendment 2a is summarised as follows:

Stage	Description
Engaged	- Documents and other information requested from Townsville City Council on 26 May 2026. - Documents and other information provided by Townsville City Council on 29 May 2026.
Review	- Review commenced on 29 May 2026. - Additional information requested on 23 June 2026 and received on 1 July 2026. - Meeting held with Townsville City Council on 2 July 2026.
Final report	Final report issued on 3 July 2026.

The following Townsville City Council personnel were consulted during the compliance check:

Name	Title	Date of discussion (s)	Scope of discussion
Tom Askern	Coordinator – City Planning, Planning, Environment and Lifestyle	26 May 2026 23 June 2026 2 June 2026	- Structure of proposed amendments - LGIP growth projection - Priority Infrastructure Area - Financial inputs - Mapping styles - Extrinsic material - Schedule of Works Model
Mark Sulovski	Senior Planning Officer – City Planning, Planning, Environment and Lifestyle	26 May 2026 23 June 2026 2 June 2026	- Structure of proposed amendments - LGIP growth projection - Priority Infrastructure Area - Financial inputs - Mapping styles - Extrinsic material - Schedule of Works Model

4. Compliance check findings

The first compliance check of Townsville City Council's proposed LGIP Amendment has been undertaken in accordance with the requirements of the Planning Act 2016, the Minister's Guidelines and Rules (MGR), and the approved form MGR5.1 – LGIP Review Checklist. The detailed findings of the compliance check are set out in the accompanying completed checklist.

The review has had regard to the outcomes of Council's consultation with relevant State agencies and infrastructure providers, including:

- a) the relevant State agency responsible for transport matters (Department of Transport and Main Roads); and
- b) the relevant water and wastewater service provider for the Townsville City Council area, namely Townsville Water.

Overall, the review finds that LGIP Amendment is supported by substantial technical investigations and infrastructure planning work. Council has undertaken comprehensive demand modelling, network analysis and infrastructure costing across the relevant trunk infrastructure networks. The planning assumptions underpinning the amendment are generally reasonable and reflect a considered approach to anticipated growth within the Townsville region.

The LGIP amendment generally aligns with the statutory requirements of the Planning Act 2016 and the MGR. The plans for trunk infrastructure (PFTI), desired standards of service (DSS), and the schedule of works have been prepared generally consistent with the SOW model requirements in Schedule 7 of the Guidelines and Rules.

The compliance check identified several opportunities to further improve the readability and accessibility of the LGIP documentation and supporting material. In particular, there is an opportunity to provide additional explanatory context that more clearly links the planning assumptions, the infrastructure sequencing rationale, and the supporting technical investigations underpinning the amendment.

The review also identified several minor mapping and documentation refinements that would improve consistency, readability, and the interpretation of the statutory mapping package. These include opportunities to improve alignment between the SOW spreadsheet, LGIP schedule of works tables and mapping references, improve visibility of service catchments and projection areas, and refine map legends, symbols and mapping presentation across the infrastructure networks.

These observations primarily relate to documentation presentation, mapping readability and supporting explanatory material and do not indicate deficiencies in the underlying technical investigations, network planning or infrastructure planning framework.

A key issue that arose from the review is financial sustainability. The cost of provision of infrastructure required to service the projected growth is currently beyond the financial resources of the Council. This points to the need for Council to target funding opportunities such as grants provided through the Queensland Government's Residential Activation Fund. This issue is not atypical for a large growing local government authority in Queensland due to the escalation of construction costs in recent years.

Detailed observations are provided in the accompanying MGR5.1 – LGIP Review Checklist.

5. Conclusions

On the basis of the first compliance check, 2EH Consulting concludes that Townsville City Council's proposed LGIP Amendment demonstrates a generally appropriate level of compliance with the requirements of the Planning Act 2016 and the Minister's Guidelines and Rules.

The LGIP amendment is underpinned by substantial technical investigations, including demand analysis, network modelling and infrastructure costing across the relevant trunk infrastructure categories. Council's planning assumptions are generally reasonable, and the infrastructure planning work reflects a thorough, considered approach to servicing anticipated growth in the Gladstone region.

The review has not identified any fundamental compliance deficiencies that would prevent the LGIP amendment from proceeding. Rather, the primary opportunities for improvement relate to documentation presentation, supporting explanatory material, mapping consistency and overall readability of the LGIP documentation.

A key issue that arose from the review is financial sustainability. The cost of provision of infrastructure required to service the projected growth is currently beyond the financial resources of the Council. This points to the need for Council to target funding opportunities such as grants provided through the Queensland Government's Residential Activation Fund. This issue is not atypical for a large growing local government authority in Queensland where costs of construction have escalated rapidly in recent times.

These matters can be addressed through targeted documentation and mapping refinements and do not require material rework of the underlying technical investigations or infrastructure planning framework.

The reviewer is satisfied that, having regard to the recommendations and observations outlined in this statement and the accompanying MGR5.1 – LGIP Review Checklist, the proposed LGIP Amendment is suitable to proceed through the statutory amendment process.

6. Recommendations

2EH Consulting recommends to Townsville City Council that LGIP Amendment should proceed, having regard to the recommendations and observations described below.

This recommendation reflects the reviewer's assessment that the LGIP amendment is fundamentally sound and supported by comprehensive technical work. The recommendations relate primarily to the presentation of documentation, supporting explanatory material, mapping consistency, and overall readability of the LGIP documentation.

7. Recommended conditions to be imposed

The following recommendations are for Townsville City Council's consideration as part of the finalisation of LGIP Amendment.

1. Council should undertake a final consistency review across the SOW spreadsheet, LGIP schedule of works tables and PFTI mapping to confirm infrastructure references, map identifiers and project codes are aligned consistently across the documentation set.
2. Council should consider minor refinements to the statutory mapping package to improve readability and interpretation, including:

- clearer identification of service catchments and projection area extents;
 - refinement of map legends and infrastructure symbols;
 - improved visibility of PIA boundaries and infrastructure items; and
 - inclusion of additional contextual mapping where appropriate.
3. Council should undertake a final editorial review of the LGIP amendment documentation prior to adoption to confirm consistency of formatting, mapping references, cross-referencing and overall presentation.
 4. Council should explore further opportunities for funding of trunk infrastructure identified in the LGIP such as Federal and State Government Grants.

These recommendations are considered achievable within the normal course of finalising the LGIP amendment and do not require material rework of the underlying technical investigations or infrastructure planning framework.

Detailed observations are provided within the accompanying MGR5.1 – LGIP Review Checklist.