



SARA reference: 2408-41971 SRA
 Applicant reference: -
 Council reference: MCU21/0089.003

18 July 2025

Mr Robert Henwood
 5 Kanbara Street
 FLINDERS PARK SA 5025
 rahplanning@bigpond.com

Attention: Robert Henwood

Dear Mr Henwood

SARA advice notice - 325 Shaw Road, Shaw

Material change of use (Other Change) - Service Station, Fast Food Outlet and Carwash

(Advice notice given under section 35 of the Development Assessment Rules)

The State Assessment and Referral Agency (SARA) advises that your development application has not adequately demonstrated compliance with the State Development Assessment Provisions.

Subsequent to your response of 27 June 2025 to SARA’s information request, SARA has reviewed the information you provided and the following issue(s) with the proposed development application have been identified:

Road safety risk assessment	
1.	<p>Issue:</p> <p>The requested detailed road safety risk assessment on the surrounding road network has not been provided, nor has the review of the proposed curve radius along Shaw Road to accommodate the proposed access intersection, been provided.</p> <p>Compliance with the outcomes of PO15-PO16 and PO25-PO27 of State Development Assessment Provisions (SDAP) State Code 1 - Development in a state-controlled road environment, have not been demonstrated.</p> <p>Action:</p> <p>You are requested to provide detailed road safety risk assessment on the surrounding road network in accordance with Transport and Main Roads’s Guide to Traffic Impact Assessment (GTIA) to confirm if development generated traffic will adversely impact road safety and identify mitigation measures to offset any development generated safety impacts (if warranted).</p>

	<p>It is anticipated that this will include at a minimum:</p> <ul style="list-style-type: none"> • A review of the proposed curve radius along Shaw Road to accommodate the proposed access intersection; and • Reviewing intensified turning movements at impacted intersections.
Flood Impact Assessment	
2.	<p>You provided a Flood Impact Assessment (FIA) prepared by Imbris, dated 14 May 2025, Ref. LCJ005-325SR-002. However, compliance with PO8-PO12 of the State Development Assessment Provisions (SDAP) State code 1 – Development in a state-controlled road environment, has not been demonstrated.</p> <p>Issue 1:</p> <p>The FIA does not include the required stormwater quantity information (i.e. peak flow rates) necessary to demonstrate that the proposed development will have no worsening impacts on the state controlled road on the pre-development conditions. It focuses on other parameters such as flood extent, flow velocities, water depth, and flood hazards and while these flooding parameters are important, the analysis of peak flow rates has been omitted, and this analysis is crucial to verify that post-development discharges to the state controlled road are immaterial and do not adversely affect it.</p> <p>The SDAP Supporting Guideline for Development in a State-controlled Road Environment specifies that the applicant should provide a stormwater assessment demonstrating design flood peak discharges for the site and surrounding area, for both pre- and post-development, for all main stormwater events (i.e. at least for 63%, 50%, 20%, 10%, 5%, 2%, and 1% AEP).</p> <p>Issue 2:</p> <p>Further assessment of the FIA indicated that the works are causing some localised afflux at 1% and 2% AEP (refer to Maps A13 and A14 of the FIA). Although the afflux has not been mentioned in the report, the coloured banding on the maps suggests up to greater than 100mm adjacent to Shaw Road pavement. The latter is not only caused by the new access, but also the adjacent car park filling, which is causing a restriction that is resulting in some residual afflux.</p> <p>Action 1:</p> <p>You are requested to provide an updated FIA to include:</p> <ul style="list-style-type: none"> o Peak runoff calculations for the above stormwater events for both pre- and post-development conditions, along with a tabulated comparison of the two scenarios to demonstrate that there is no worsening impact on the state controlled road. o If the results of the above comparison indicate an increase in peak flow rates for the post-development scenario, the FIA must also include details of the proposed mitigation measures (e.g. onsite detention tank volume capacity and outlets specifications) to ensure that peak flow discharges are reduced to be equal to or less than those of the pre-development scenario. o Drawings showing catchment areas, contour plans, drainage layouts, and flow path directions for both pre- and post-development conditions. <p>Action 2:</p> <p>You are requested to provide an updated FIA which demonstrates that the development</p>

achieves the acceptable afflux criteria in SDAP (up to +10mm) via further mitigation.

OR

Provide evidence that the development impact is not material, by demonstrating that the edge line of the state controlled road has plenty of freeboard at the design flood immunity (1% AEP), that is, at least 200mm of freeboard in the post-developed case (at 1% AEP).

In order to demonstrate the latter, you are requested to prepare and submit a number of cross sections through the table drain in the area of afflux, clearly showing the pre- and post-flood levels along with the road pavement and edge line.

Please note that unlike an information request, assessment timeframes do not stop when advice is provided by SARA.

How to respond

It is recommended that you address these issues promptly and provide a response to SARA as soon as possible.

If you decide not to respond, your application will be assessed and decided based on the information provided to date.

Under the [Development Assessment Rules](#) (DA Rules), the issuing of advice does not stop the assessment timeframes. If you intend to provide additional information, it should be provided in a timely manner to allow sufficient time for the information to be considered. As such, you are strongly encouraged to consider using the 'stop the clock' provisions under s32 of the DA rules, to allow sufficient time for you to consider and respond to SARA's advice; and for SARA to consider any new or changed material provided.

If you wish to utilise the 'stop the clock' provisions, you should give notice to the assessing authority (assessment manager or referral agency) whose current period you wish to stop. This can be done through MyDAS2 or via correspondence.

You are requested to upload your response using the 'manage documents' function in [MyDAS2](#).

If you require further information or have any questions about the above, please contact Kirsty Geaney, Principal Planning Officer, on 47583414 or via email NQSARA@dasilgp.qld.gov.au who will be pleased to assist

Yours sincerely



Carl Porter
A/ Manager Planning

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

Development details	
Description:	Development permit Material change of use (Other Change) - for a Service Station, Fast Food Outlet and Carwash
SARA role:	referral agency
SARA trigger:	Schedule 10, Part 9, Division 4, Subdivision 2, Table 4, Item 1 (<i>Planning Regulation 2017</i>)—Material change of use of premises within 25m of a state-controlled road and within 100m of a state-controlled road intersection
SARA reference:	2408-41971 SRA
Assessment criteria:	State Development Assessment Provisions (SDAP) State code 1: Development in a State-controlled road environment