

MP ref: M2394
DA ref: RAL25/0007
QA: ma.ms.mc

27 March 2025

Assessment Manager
Townsville City Council
PO Box 1268
TOWNSVILLE QLD 4810
Via: developmentassessment@townsville.qld.gov.au

Attention: Maris-Claire Salazar – Planning and Development

Dear Maris,

Re: Response to Information Request
Development Application seeking a Development Permit for Reconfiguring a Lot
– Boundary Realignment (Two Lots into Two Lots) on land described as Lots 21
and 22 on 222366 and located at 281 and 293 Allambie Lane, Gumlow

On behalf of the Applicant, Milford Planning refer to the abovementioned development application and to correspondence dated **24 March 2025**, being the formal Information Request issued by Townsville City Council (Council) (refer **Attachment 1**).

In response to Council's Information Request, and in accordance with Section 13.2 of the Development Assessment Rules, we hereby provide a response to all of the information requested as detailed in **Table 1** below.

Table 1 – Response to Information Request

Item	Response
Item 1 Ongoing Land Use – Lot 21	<p>This item requested further information on how proposed Lot 21 can continue to support ongoing rural uses consistent with the intent of the Mixed Farming Precinct, considering the proposed lot size.</p> <p>While acknowledging the prescribed minimum lot size of 40 ha for the Mixed Farming Precinct, the proposal warrants performance-based assessment against the higher-order provisions of the Rural Zone Code. The purpose of the Rural Zone Code emphasises providing opportunities for uses that are "compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the</p>

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Table 1 – Response to Information Request

Item	Response
	<p>long-term use of the land for rural purposes." This proposal specifically supports these objectives through intentional reconfiguration of allotment parcels. Notably, during prelodgement discussions, Council indicated support for the proposed application, acknowledging that both lots are already under the Mixed Farming Precinct minimum lot size and that the application can address the relevant assessment benchmarks of the planning scheme.</p> <p>Importantly, this boundary realignment does not result in any net loss of agricultural land - rather, it enhances the overall productive capacity of the rural land through more efficient arrangement. The transfer of the rear paddock on Lot 21 to the actively operating turf farm on Lot 22 consolidates productive agricultural land under single management, improving operational efficiency and economic viability. This directly supports the code's purpose to maximise opportunities to diversify and add value to rural production within the ecological constraints of the land.</p> <p>From a land management perspective, the reduced lot size of Lot 21 promotes more sustainable outcomes. The revised lot size better aligns with the current owner's maintenance capabilities while retaining the essential rural character of the property. This ensures the land remains actively managed and maintained, rather than potentially falling into disuse due to management constraints. This directly answers PO29 of the Reconfiguring a Lot Code, which supports boundary realignment in the Rural Zone where it contributes to "potential for improved land management practices."</p> <p>The reduced lot size of Lot 21, being approximately 3.4 ha, maintains compatibility with the Mixed Farming Precinct's intent and remains capable of supporting compact agricultural activities, including small-scale animal husbandry and cropping. It is noteworthy that the existing site is already of a smaller scale than the prescribed threshold and is not located within a key production area of the Townsville region, thus has a very limited impact on the region's agricultural productivity.</p> <p>It is further noted that there is established precedent for smaller scale rural lots accommodating dwelling houses in the immediate surrounds, including several lots of approximately 1 ha each along this section of Allambie Lane. Lot 1SP112198 directly adjoining the access handle of Lot 22 is noted as having a total area of 8,000 m². This existing development pattern demonstrates that Council has historically accepted such outcomes in this locality, and that the proposed lot sizes are consistent with the established character and amenity of the area.</p> <p>Finally, it is noted that any future development of the site will be subject to the requirements of the planning scheme, ensuring that any incompatible proposed development will undergo appropriate assessment at the appropriate time.</p>
Item 2 Water Supply	<p>This item requested further information on the proposed water supply for both proposed allotments. Further information must demonstrate that sufficient water supply is available to service ongoing rural land uses and firefighting purposes, as well as a potable water supply for both proposed allotments.</p> <p>In response to this item, it is confirmed that the existing registered bore (RN102814) to be transferred from Lot 21 to Lot 22 was historically installed to service the rear paddock at a time when it was used for</p>



Table 1 – Response to Information Request

Item	Response
	<p>agricultural production, being turf farming. Refer to Attachment 2 for further detail of this infrastructure.</p> <p>Rear Lot 22 is intended to operate with the use of this bore, in addition to two other bores (RN153361 and RN166518) already located on the lot. Thus, it is considered that Lot 22 is sufficiently connected to water supply to service the relevant demand. It is noted that this rear lot operates strictly as a cropping use and does not support any residential dwellings. Lot 21 will continue to utilise its existing domestic water to support the unchanged use of the site.</p> <p>Thus, it is considered that each allotment will contain its own potable water source. Should Council require further comfort around this issue, it is suggested that the requirement for each lot to have a water supply reflecting the needs of the respective use are conditioned on a development permit approving the proposed boundary realignment.</p>

Proceeding

We trust the above and attached information is sufficient to allow Council to assess the development application. If Council is of the view that the response does not appropriately address the Information Request, we request the opportunity to meet to discuss further.

If you have any questions regarding this correspondence, please contact the undersigned or Matteo Sandona on TEL: (07) 4724 0095.

Yours sincerely,

MILFORD PLANNING


Electronic

Macy Atkinson
TOWN PLANNER

Encl: Attachment 1 – Council Information Request
Attachment 2 – Bore Report

Attachment 1



Date >> 24 March 2025

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Dear Sir/Madam

Information Request

Planning Act 2016

As per our telephone conversation on 21 March 2025 please be advised that, upon review of the below mentioned development application, further information is required to undertake a comprehensive assessment. In accordance with section 12 of Development Assessment Rules under the *Planning Act 2016* the following information is requested.

Application Details

Application no:	RAL25/0007
Assessment no:	12201014
Proposal:	Boundary Realignment - Two Lots into Two Lots
Street address:	281 Allambie Lane GUMLOW QLD 4815 293 Allambie Lane GUMLOW QLD 4815
Real property description:	Lot 21 SP 222366 Lot 22 SP 222366
Applicant's reference:	M2394

The information requested is set out below >>

Request Item 1 - Ongoing Land Use - Lot 21

The applicant is requested to provide further information on how proposed Lot 21 can continue to support ongoing rural uses consistent with the intent of the Mixed Farming precinct, considering the proposed lot size.

Reason

To demonstrate compliance with the purpose of the Rural zone code and Strategic framework of the Townsville City Plan.

Advice

The applicant is advised that all proposed allotments must function as rural properties, not rural residential properties.

Request Item 2 - Water Supply

The applicant is requested to provide further information on the proposed water supply for both proposed allotments. Further information must demonstrate that sufficient water supply is

available to service ongoing rural land uses and firefighting purposes, as well as a potable water supply for both proposed allotments.

If either proposed allotment is to rely on existing bore water supply, the applicant must demonstrate that appropriate licenced rights are in place.

Reason

To demonstrate compliance with PO11 of the Works Code of the Townsville City Plan.

End of Information Request >>

Under the provisions of the Development Assessment Rules under the *Planning Act 2016*, you have three options available in response to this Information Request. You may give the assessment manager (in this instance Council):

- (a) all of the information requested; **or**
- (b) part of the information requested; **or**
- (c) a notice that none of the information will be provided.

For any response given in accordance with items (b) and (c) above, you may also advise Council that it must proceed with its assessment of the development application.

Please be aware that under the Development Assessment Rules under the *Planning Act 2016*, the applicant is to respond to any Information Request within **3 months** of the request. If you do not respond to the Information Request within this time period, or, within a further period agreed between the applicant and Council, it will be taken that you have decided not to provide a response. In the event of no response being received, Council will continue with the assessment of the application without the information requested.

Council prefers that all of the information requested be submitted as one package. If any additional matters arise as a result of the information submitted, or, as a result of public notification (where applicable), you will be advised accordingly.

Should any referral agency make an information request, you are reminded of your obligation to provide council with a copy of the information response provided to that referral agency.

You may wish to follow the progress of this application using PD Online on Council's website www.townsville.qld.gov.au

If you have any further queries, please do not hesitate to contact Maris-Claire Salazar on telephone 07 4727 9412, or email developmentassessment@townsville.qld.gov.au.

Yours faithfully



For Assessment Manager
Planning and Development

Attachment 2

From Year:

Registered Number	Facility Type	Facility Status	Drilled Date	Office	Shire
102814	Sub-Artesian Facility	Existing	16/08/2003	Ayr	7010 - TOWNSVILLE CITY
Details			Location		
Description			Datum	GDA94	Basin 1180
Parish	4080 - ROSS		Latitude	19-21-55	Sub-area
Original Name			Longitude	146-42-45	Lot 2
			GIS Latitude	-19.365380373	Plan SP112198
			GIS Longitude	146.712432492	
Driller Name	ION NEWTON		Easting	469800	Map Scale
			Northing	7858718	Map Series
Const Method	ROTARY AIR		Zone	55	Map No
Bore Line			Accuracy	GPS	Map Name
D/O File No		Polygon	GPS Accuracy	100	Prog Section
R/O File No		Equipment	Checked	Yes	
H/O File No		RN of Bore Replaced			
Log Received Date		Data Owner			
Roles	Water Supply				

Casing									4 records for RN 102814
Pipe	Date	Rec	Top (m)	Bottom (m)	Material Description	Mat Size (mm)	Size Desc	Outside Diameter (mm)	
A	16/08/2003	1	0.00	31.50	Plastic Casing	6.700	WT - Wall Thickness	160	
A	16/08/2003	2	25.00	31.00	Perforated or Slotted Casing	2.000	AP - Aperture Size	160	
A	16/08/2003	3	5.00	31.50	Gravel Pack	7.000	GR - Gravel Size	127	
A	16/08/2003	4	0.00	5.00	Grout			127	

From Year:

Rec	Top (m)	Bottom (m)	Strata Description
1	0.00	4.80	CLAY
2	4.80	8.50	C/SAND
3	8.50	9.00	HARD CEMENTED SAND
4	9.00	10.60	C/SAND FIRM
5	10.60	16.00	CLAY
6	16.00	19.80	CEMENTED SAND
7	19.80	20.40	COBBLES AND GRAVEL
8	20.40	26.80	SANDY GREY CEMENTED SAND
9	26.80	31.50	SAND AND COBBLES (WATER) EST SUPPLY
10			8L/S 3HR TEST
Stratigraphies			0 records for RN 102814
Aquifers			0 records for RN 102814
Pump Tests Part 1			0 records for RN 102814
Pump Tests Part 2			0 records for RN 102814
Bore Conditions			0 records for RN 102814
Elevations			0 records for RN 102814
Water Analysis Part 1			0 records for RN 102814
Water Analysis Part 2			0 records for RN 102814
Water Levels			0 records for RN 102814
Wire Line Logs			0 records for RN 102814

From Year:

Field Measurements	0 records for RN 102814
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Special Water Analysis	0 records for RN 102814
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From Year:

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From Year:

Registered Number	Facility Type	Facility Status	Drilled Date	Office	Shire
153361	Sub-Artesian Facility	Existing	14/10/2012	Ayr	7010 - TOWNSVILLE CITY

Details				Location			
Description				Datum	GDA94	Basin	1180
Parish	4080 - ROSS			Latitude	19-22-04	Sub-area	
Original Name	DAM BORE			Longitude	146-42-43	Lot	22
				GIS Latitude	-19.3677121	Plan	SP222366
				GIS Longitude	146.7120273		
Driller Name	CALVERT, JOHN			Easting	469758	Map Scale	
				Northing	7858460	Map Series	
Const Method	ROTARY AIR			Zone	55	Map No	
Bore Line				Accuracy	GPS	Map Name	
D/O File No	AYD/110/000 (0011)	Polygon		GPS Accuracy	4	Prog Section	
R/O File No		Equipment		Checked	Yes		
H/O File No		RN of Bore Replaced					
Log Received Date	02/11/2012	Data Owner	DNR				
Roles	Water Supply						

Casing									4 records for RN 153361
Pipe	Date	Rec	Top (m)	Bottom (m)	Material Description	Mat Size (mm)	Size Desc	Outside Diameter (mm)	
A	14/09/2012	1	0.00	30.00	Polyvinyl Chloride	6.700	WT - Wall Thickness	150	
A	14/09/2012	2	18.00	30.00	Perforated or Slotted Casing	2.000	AP - Aperture Size	150	
A	14/09/2012	3	6.00	30.00	Gravel Pack	10.000	GR - Gravel Size	205	
A	14/09/2012	4	0.00	6.00	Grout			205	

From Year:

Strata Logs	7 records for RN 153361
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Rec	Top (m)	Bottom (m)	Strata Description
1	0.00	0.10	DECO FILL
2	0.10	2.00	GREY SANDY CLAY
3	2.00	4.00	BROWN SANDY CLAY
4	4.00	6.00	YELLOW CLAY
5	6.00	17.00	BROWN SANDY CLAY & SMALL STONE
6	17.00	29.00	BROWN CLAY COARSE SANDY & RIVER GRAVEL *
7	29.00	30.00	GREY BROWN GRANITE

Stratigraphies	0 records for RN 153361
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Aquifers	0 records for RN 153361
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Pump Tests Part 1	0 records for RN 153361
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Pump Tests Part 2	0 records for RN 153361
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Bore Conditions	0 records for RN 153361
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Elevations	0 records for RN 153361
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Water Analysis Part 1	0 records for RN 153361
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Water Analysis Part 2	0 records for RN 153361
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Water Levels	0 records for RN 153361
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Wire Line Logs	0 records for RN 153361
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Field Measurements	0 records for RN 153361
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From Year:

Special Water Analysis	0 records for RN 153361
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From Year:

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From Year:

Registered Number	Facility Type	Facility Status	Drilled Date	Office	Shire
166518	Sub-Artesian Facility	Existing	21/10/2011	Ayr	7010 - TOWNSVILLE CITY
Details			Location		
Description			Datum	GDA94	Basin 1180
Parish	4080 - ROSS		Latitude	19-21-55	Sub-area
Original Name			Longitude	146-42-37	Lot 22
			GIS Latitude	-19.36531434	Plan RP222366
			GIS Longitude	146.71020325	
Driller Name	MCDONALD, DEREK		Easting	469566	Map Scale
			Northing	7858725	Map Series
Const Method	ROTARY AIR		Zone	55	Map No
Bore Line			Accuracy	GPS	Map Name
D/O File No	NOR/078812	Polygon	GPS Accuracy	10	Prog Section
R/O File No		Equipment	Checked	Yes	
H/O File No		RN of Bore Replaced			
Log Received Date	25/11/2015	Data Owner	DNR		
Roles	Water Supply				

Casing								5 records for RN 166518
Pipe	Date	Rec	Top (m)	Bottom (m)	Material Description	Mat Size (mm)	Size Desc	Outside Diameter (mm)
A	21/10/2011	1	0.00	28.00	Polyvinyl Chloride	5.900	WT - Wall Thickness	125
A	21/10/2011	2	15.00	28.00	Perforated or Slotted Casing	2.000	AP - Aperture Size	125
X	21/10/2011	3	6.50	28.00	Cuttings or other fill between casing and hole wall			192
X	21/10/2011	4	6.00	6.50	Bentonite Seal			192
X	21/10/2011	5	0.00	6.00	Grout			192

From Year:

Strata Logs 8 records for RN 166518

Rec	Top (m)	Bottom (m)	Strata Description
1	0.00	0.20	TOP SOIL
2	0.20	3.00	BROWN CLAY
3	3.00	6.00	CLAY FINE SAND
4	6.00	12.00	CLAY COARSE SAND
5	12.00	15.00	SAND FINE GRAVEL
6	15.00	24.00	FINE GRAVEL
7	24.00	26.00	WEATHERED GRANITE
8	26.00	28.00	HARDER GRANITE

Stratigraphies 0 records for RN 166518

Aquifers 1 records for RN 166518

Rec	Top (m)	Bottom (m)	Lithology	Date	SWL (m)	Flow	Quality	Yield (L/s)	Contr	Cond	Formation Name
1	15.00	24.00	GRAV - Gravel	21/10/2011	-17.00	N	POTABLE	0.21	Y	XX	

Pump Tests Part 1 0 records for RN 166518

Pump Tests Part 2 0 records for RN 166518

Bore Conditions 0 records for RN 166518

Elevations 0 records for RN 166518

Water Analysis Part 1 0 records for RN 166518

Water Analysis Part 2 0 records for RN 166518

From Year:

Water Levels	0 records for RN 166518
Wire Line Logs	0 records for RN 166518
Field Measurements	0 records for RN 166518
Special Water Analysis	0 records for RN 166518

From Year:

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