

5 August 2025

Urbicus Ref: URB24-270
Primary Contact: Mark Kierpal

Chief Executive Officer
Office of the Coordinator-General
1 William Street
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Applicant response to an information request under Section 13 of the Development Assessment Rules

OCG reference: OUT25/2143
Property details: 60 Penelope Road, Stuart

In accordance with section 13.2 of the Development Assessment Rules, I wish to advise that I am providing:

- ☒ **all** of the information requested
- ☐ **part** of the information requested

In giving this part-response I also advise that:

- ☒ I now require you to proceed with your assessment of this application under section 13.3 of the Development Assessment Rules, effectively ending my applicant-response period.

or

- ☐ I intend to provide further information at a later time before the end of the applicant-response period.

or

- ☐ **None** of the information requested and I now require you to proceed with your assessment of this application under section 13.3 of the Development Assessment Rules, effectively ending my applicant-response period.

In support of our response the following documents are provided:

1. Traffic Engineering Response prepared by BMC Traffic
 2. Stormwater Management Plan prepared by Langtree Consulting
 3. Updated Planning and Codes Report prepared by Urbicus
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We address the specific items raised in Councils “Information Request” as follows:

Item 1 – Conceptual drainage layout plan - Stormwater management

The Site Plan (prepared by McCabe Architects, drawing number TP.02, dated 21 January 2025) proposes the addition of a building with an area of approximately 3,000m² and a total of 6,930m² of concrete hardstand across the site. The increase in concrete hardstand area is likely to increase stormwater discharge from the site, which can have adverse impacts on the adjacent state-controlled road and road transport infrastructure.

Additional information is required to demonstrate how adverse impacts arising from this additional stormwater discharge will be avoided and mitigated.

The proponent is requested to provide a Stormwater Management Plan, prepared by a suitably qualified RPEQ, that includes the following information:

- a) a conceptual stormwater drainage layout plan, demonstrating:
 - i. the proposed internal stormwater network on the site, including, but not limited to the roof water connections, pit and pipe network, field inlets, drains and any required detention basins; and
 - ii. how roof and surface water flows are to be collected and conveyed to legal points of discharge to ensure no increase in stormwater flows towards the state-controlled road;
- b) an assessment of the proposal’s potential to impact upon water environmental values, including potential emissions or releases;
- c) details on potential contaminants present as a result of the waste streams to be accepted onsite and the proposed reprocessing and treatment methods for these waste streams;
- d) detail regarding how the site will separate and manage clean and contaminated stormwater runoff from the site (e.g. ensuring clean stormwater is directed away from operational areas);
- e) detail on all mitigation measures that will be implemented to ensure water environmental values are protected from offsite releases, water quality objectives are met and risks relating to contaminant release are avoided or mitigated;
- f) detail regarding how stormwater will be monitored and analysed, including for proposed onsite reuse; and
- g) demonstration of how the required pollutant load reductions, set out in

Townsville City Council's SC6.4 Development Manual Planning Scheme Policy and prescribed by the State Planning Policy 2017, will be achieved. The minimum required reductions are as follows:

- i. 80% total suspended solids (TSS).
- ii. 65% total phosphorus (TP).
- iii. 40% total nitrogen.
- iv. 90% gross pollutants > 5mm.

Response

In response to Item 1, refer to the attached Stormwater Management Plan as prepared by Langtree Consulting.

Item 2 – Concept Servicing Plan - Infrastructure plans

The proponent is requested to provide a Concept Servicing Plan, prepared by a suitably qualified RPEQ, to show:

- a) *the fire hydrants proposed onsite and how they are to be supplied;*
- b) *the provision of a private on-site wastewater pumping system;*
- c) *any external rising main extension required to discharge effluent to TCC's sewerage network; and*
- d) *any anticipated external infrastructure modifications (e.g. any relocation of the existing stormwater pit and streetlight on Penelope Road to allow 1m separation from the proposed southern driveway crossover).*

Response

The requested information will be completed at detailed design stage and are standard requirements of an industrial development and will be finalised at operational works stage. In relation to the proposed crossovers, it is noted that the proposed access maintains the approved access arrangement as per the historical approval on site (SDA Approval No. AP2023/008) and all measures undertaken as part of the historical approval can be followed. Compliance can be conditioned as part of an approval.

Item 3 – Water Treatment System and Wash Bay

The Site Plan (TP.02), prepared on 21 January 2025 by McCabe Architects, shows a Wash Bay and Water Treatment System to be present in the northeastern corner of the site, however no other mention of these elements is included in the application materials.

The proponent is requested to provide additional details about the Wash Bay and Water Treatment System, including but not limited to:

- a) *their purpose;*

- b) *their functionality;*
- c) *the nature of any materials to be discharged; and*
- d) *the proposed discharge point/s (e.g. stormwater network, sewerage system or off-site disposal).*

Response

The proposed wash bay is provisioned for potential future incorporation if necessary. As part of the historical approval, vehicle washing was envisioned as part of the general water quality operations without specific detail. If the site were to be altered or utilised for a different use in the future, the wash bay would be suitably provisioned.

The proposed bay will have an appropriate water treatment system – compliance with relevant standards can be conditioned as part of an approval.

Item 4 – Landscaping buffer

In accordance with the Townsville City Council (TCC) Works Code, landscaping buffers with a minimum width of 2m should be provided along road frontage boundaries, including the boundary adjoining Ron McLean Drive.

Shade trees should also be provided within parking areas at the following rate:

- a) *in single sided, angle or parallel bays – 1 tree per 3 parking spaces; and*
- b) *in double sided, angle or parallel bays – 1 tree per 6 parking spaces.*

The proponent is requested to amend application materials to demonstrate the provision of landscaping buffers and shade trees in accordance with the standards outlined above.

Response

In response to Item 4, we note the following:

- The proposal is of a similar scale and built form to the previous approval over the site, which did not include a landscape buffer to Ron Mclean Drive, and also did not provide shade trees within the car parking area. The proposed extent of landscaping is comparable to the approved design and therefore suitable for the proposed works.
- It is also noted that there are nearby projects which have been completed which do not include the requested shade trees or buffers to Ron Mclean Drive, specifically at 2 and 40 Penelope Road, Stuart.
- The proposal has a significant existing separation to Ron Mclean Drive at approximately 11m, which provides a suitable buffer from the subject site and

ensures that the streetscape of Ron Mclean Drive will not be impacted.

Planned operations

Item 5 – Traffic movements

Appendix A – Proposed Plans, prepared 21 January 2025 by McCabe Architects, includes Swept Paths. However, this plan is lacking some key elements that are required to determine the relevant TCC code outcomes.

The proponent is requested to amend the Swept Paths plan, prepared 21 January 2025 by McCabe Architects to show:

- a) *the crossover extents, including any splays;*
- b) *the roadway kerb and channel on both sides of Penelope Road;*
- c) *vehicles parked along the western side of Penelope Road;*
- d) *that trucks can enter and exit the site under the circumstances listed a-c above, without encroaching outside of the road carriageway or the sealed crossovers and crossover splays; and*
- e) *further detail on expected trip quantities, including by different vehicle types.*

Response

Refer to the attached Traffic Engineering Response prepared by BMC Traffic which provides the requested swept paths.

Item 6 – Parking

The Updated Planning Report, prepared on 3 March 2025 by Urbicus, indicates that 15 parking spaces will be provided onsite. TCC's prescribed parking rate for a Medium Impact Industry use is 1 space per 100m² GFA, resulting in a parking requirement of 30 spaces.

The proponent is requested to provide further information to justify that the proposed parking capacity will meet the anticipated demand generated by the development and avoid contributing to on-street parking that adversely impacts upon the road network and local amenity.

Response

Refer to the attached Traffic Engineering Letter prepared by BMC Traffic which provides justification of the proposed parking rates. Additionally, the following comments are provided:

- The proposed carparking rates are suitable for the proposed extent of activity and works over the site. As per the attached letter outlining the nature of the proposed

operations, the proposed operations do not require the requested 30 carparks, with ample carparking for employees and visitors.

- If operations were increased in scale in the future, space is available to increase carparking capacity, however at this stage this is not necessary.

Item 7 – Hazardous materials

The Updated Planning Report, prepared on 3 March 2025 by Urbicus, states that the proposal does not involve hazardous chemicals, however no mention is made of other types of hazardous materials.

In accordance with the Townsville City Plan, structures used for the manufacturing or storage of hazardous materials in bulk are to be designed to prevent the intrusion of flood waters up to at least a 0.2% AEP flood event.

The proponent is requested to:

- a) advise whether any other types of hazardous materials are anticipated to be present onsite;*
- b) if hazardous materials are to be present onsite, demonstrate how the intrusion of flood waters up to at least a 0.2% AEP flood event will be prevented.*

Response

Standard E-waste materials (e.g. batteries, electronic devices etc.) will be present on site, however given the proposal is for temporary storage purposes and transferring, the proposal does not pose a safety hazard.

Compliance can be conditioned as part of an approval.

Item 8 – Accepted waste types

The Updated Planning Report, prepared on 3 March 2025 by Urbicus, identifies a range of different waste types proposed to be accepted at the site. No differentiation is made, however, between the types of waste to be received onsite, particularly in relation to lithium-ion and lead acid batteries. Further information is required to appropriately assess the risk of the proposed waste streams.

The proponent is requested to provide further detail regarding:

- a) the specific types of waste to be accepted at the site;*
- b) the expected quantities of each waste type to be received at the site;*
- c) the intended maximum quantities of each waste type to be stored temporarily at*

- the site; and*
- d) *the site suitability to accept and store the nominated waste types.*

Response

In response to Item 8, we provide the following information:

- The proponent has provided the following responses regarding the requested information:

The specific types of waste accepted: **Various - Mixed Batteries, metal for recycling, lighting waste, E Waste, solar panels, coffee pods, bottle caps, etc**

The expected quantities of each type: **Whilst the proposal will not operate at fixed rates , approximately 60,000 tonnes per year with no more than 3,000 tonnes in stock at any one time.**

The intended maximum quantities of each waste type to be stored: **We never see this as impossible to say and indeed manage. See above and that's the way its normally done.**

The suitability of the site for these waste types: **Yes the site is suitable - purpose built so can't get much better.**

The proposal is limited to the storage and sorting of E-waste products collected from various retailers to then be appropriately and safely processed and treated at a separate processing site. It is noted that the previous correspondence and indication on this matter was due to the site being considered as a potential utilised for this purpose.

If the site is to be utilised for processing and treatment of E-Waste in the future, a subsequent application will be submitted to reflect this.

Item 9 – Environmentally Relevant Activities (ERAs)

The Updated Planning Report, prepared on 3 March 2025 by Urbicus notes that the proposed use does not trigger any ERA thresholds, however on review of the material it is likely an Environmental Authority is required for the operation of the activity. The proponent must hold an Environmental Authority prior to operation of the activity.

The proponent is requested to:

- a) *undertake, and provide details of, pre-lodgement discussions with the Department of Environment, Tourism, Science and Innovation through [Application for pre-lodgement services \(ESR/2015/1664 and ESR/2023/6440\)](#) |*

[Environment, land and water / Queensland Government](#) or

- b) identify the relevant pathway to determine if an Environmental Authority is required and when the proponent will undertake this.

Response

An ERA application will be undertaken, specifically ERA 62 for waste transfer station, at a time to be determined by the proponent.

Item 10 – Environmental mitigation - Offsite impacts

The Updated Planning Report, prepared on 3 March 2025 by Urbicus, states that the proposal is not anticipated to produce any notable environmental or off-site impacts. However, no further information or reporting has been provided to corroborate this statement and no mitigation measures for environmental impacts have been mentioned.

The proponent is requested to:

- a) provide further details on how the development has been designed to avoid or mitigate adverse impacts from air, noise and other emissions that will affect the health, safety, wellbeing and amenity of communities and individuals; and*
- b) demonstrate how the development has been designed to avoid or mitigate conflicts arising from odour, noise, dust and light emissions with sensitive receptors and/or incompatible land uses.*

Response

In response to Item 10, we note the following:

- The proposed proposal will operate as a sorting centre to appropriately separate and sort various E-waste products. The proposal will not involve treatment or any notable works to the products and materials as this will occur at the “processing site” which is appropriately set up for such and therefore is not anticipated to generate any environmental impacts that are not considered as reasonable within the locality i.e. an industrial precinct.

Item 11 – Air quality

The Updated Planning Report, prepared on 3 March 2025 by Urbicus, states that the proposal is not anticipated to generate any significant adverse impacts to air quality. However, no further information has been provided to corroborate this statement.

The proponent is requested to undertake and provide an air quality impact assessment (AQIA) that demonstrates that the development achieves the air quality objectives of the Environmental Protection (Air) Policy 2019 and consistent with the Department of Environment, Tourism, Science and Innovation (DETSI)'s [Guideline - Application requirements for activities with impacts to air](#).

Response

The requested air quality is not considered to be necessary given the scale of the operations and locality of the subject site. The proposal is located within an Industrial Precinct which has a significant separation to the nearest residential area and is to be used to sort and transfer E waste materials to a further processing site and therefore air impacts will be primarily limited to vehicular movements.

Item 12 – Noise Impact Assessment

Section 3 of the Updated Planning Report, prepared on 3 March 2025 by Urbicus, states that a baler is to be used onsite, however limited additional information is provided regarding noise impacts arising from the proposed activities.

The proponent is requested to provide a Noise Impact Assessment that includes the following:

- a) *at minimum, one week of noise monitoring;*
- b) *identification of all environmental values and corresponding acoustic quality objectives at the site in accordance with the Environmental Protection (Noise) Policy 2019;*
- c) *identification of all noise, including stationary and mobile sources, associated with the proposed activities;*
- d) *detailed descriptions of the characteristics of the noise emissions to be produced;*
- e) *information on the location of sensitive receptors – both residential and commercial – and the location of noise measurement (current background noise). This is best provided as a map with the clearly marked locations of sensitive receptors and background noise monitoring;*
- f) *detailed information about the background noise monitoring, including:*
 - a. *all statistical noise descriptors relevant to the measurement of background noise;*
 - b. *noise measurement notes describing the soundscape whilst the attended noise measurement is taken (at minimum, during the setting and retrieving of the noise logger).*

Further guidance on background noise monitoring can be found in the [Noise Measurement Manual](#); and
- g) *a noise modelling impact assessment at the identified sensitive receptors to determine the potential adverse acoustic impacts of the proposed activity.*

Reporting on background noise assessment and noise modelling must be prepared in accordance with the [Guideline: Application requirements for activities with noise impacts](#).

Response

As noted in Item 11 above, the proposal is essentially maintained as a sorting and transfer facility for E-waste and will not involve any significant noise generating activities. The primary noise generating elements will be limited to the movement of vehicles which is considered to be a consistent and anticipated impact within the locality.

In accordance with Section 60 of the *Planning Act 2016* the Information and Referral Part under the DA Rules is now at an end and we will proceed with the Decision Part.

Should you have any queries please contact our office.

Yours sincerely



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