



28 August 2020

Paul Johnstone
General Manager Planning
City of Townsville
PO Box 1268
Townsville QLD 4810

BY POST/EMAIL – CityPlan@townsville.qld.gov.au

Dear Mr Johnstone,

Proposed amendments to Schedule 6.4 Development manual planning scheme policy and adoption of Cairns Townsville Mackay Code

Thank you for the opportunity to provide comments on the City of Townsville's (council) proposed amendments of schedule 6.4 development manual planning scheme policy, and adoption of the Cairns Townsville Mackay (CTM) Water Alliance Design and Construction Code (city plan amendments).

The Urban Development Institute of Australia Queensland Townsville (the Institute) is supportive of outcomes aimed at improving the delivery and liveability of our communities in Queensland. Ensuring the Townsville City Plan has up-to-date and coordinated guidance documents is key to achieving good development outcomes. We welcome council's work on carrying out a review and consulting on the city plan amendments.

We would like to take this time in thanking council for arranging an industry workshop where representatives of the Institute were able to attend and provide in person feedback. We urge council to continue this protocol for future planning scheme amendments.

The Institute is supportive of the CTM Water Alliance and principally supportive of the CTM Code to provide a consolidated set of technical standards for water supply and sewerage infrastructure intended for use across all of North Queensland. Harmonising water supply and sewerage services has the ability to create efficiencies across the three regions for the benefit of the community, local governments and the property development industry.

The Institute does raise some concern over the city plan amendments, specifically the CTM Water Alliance Design and Construction code (the code) and its nexus with the South East Queensland Water Supply and Sewerage Design and Construction Code (SEQ Code)). We are concerned that, in reviewing the code, there remains significant references to the SEQ Code (including sub-references to Queensland Urban Utility standards) within the CTM Code. Specifically, we are concerned that the SEQ Code may not be fully suitable to the North Queensland region environment and will pose significant risks for delivering essential infrastructure. In addition, the complexities around

referencing and interpreting numerous related codes and documents that have been developed for other regions may inhibit timely and suitable outcomes.

Further, the Institute is concerned as to how the use and assessment under the CTM Code will respond when there are changes to the SEQ Code. Also, whether such changes will be reviewed first and how they will translate into requirements on our members in North Queensland.

The Institute recommends council undertake a further review of the CTM Code and consider how the code can remain separate and standalone document to the SEQ Code. The Institute considers further significant collaboration is required with the industry to help council deliver this code.

We note that the Institute has not specifically reviewed all of the content within the CTM Code or the referenced documents as we see the above mentioned issue should be clarified in the first instance.

Thank you for the opportunity to provide our feedback on the city plan amendments. We welcome further engagement opportunities on the city plan amendments and any other planned amendments or initiatives relating to planning and development. If you have any questions in relation to the items raised in this letter, please contact Policy Executive, Robert Tily (rtily@udiaqld.com.au) on (07) 3229 1589.

Yours sincerely,
Urban Development Institute of Australia Queensland

A handwritten signature in black ink, appearing to read 'Duane Gibson', with a long horizontal stroke extending to the right.

Duane Gibson
Townsville Branch President