



Town Planning and Project Services

19 April 2025

Chief Executive Officer
Douglas Shire Council
64-66 Front Street
MOSSMAN QLD 4873

Attention: Daniel Lamond

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**RE: RESPONSE TO INFORMATION REQUEST – COMBINED DEVELOPMENT APPLICATION
FOR RECONFIGURING A LOT (1 LOT INTO 2 LOTS) AND A MATERIAL CHANGE OF USE
(DUAL OCCUPANCY) OVER LAND AT 12 DAVIDSON STREET, PORT DOUGLAS, MORE
FORMALLY DESCRIBED AS LOT 706 ON CROWN PLAN PTD2092**

Council ref: MCUC 2025_5721/2

Aspire Town Planning and Project Services has been engaged and act on behalf of Davidson Developments Pty Ltd (the 'Applicant') in relation to the above matter.

We refer to the above-mentioned Development Application and the Request for Further Information received from Douglas Shire Council on the 26 March 2025.

On behalf of the Applicant, we hereby provide this formal Response to the Information Request Notice, prepared in accordance with Section 13.2(a) of the Development Assessment Rules V2 (DA Rules). The information and clarifications contained herein aim to comprehensively address Council's concerns.

Item I: Tourist Accommodation Zone Code

The proposal does not comply with a number of the acceptable outcomes from the Tourist Accommodation Zone Code. In particular, the road boundary setbacks, lack of ability to landscape the road boundary setback, landscaping and recreation area under supply and excessive site cover. It is likely that if the proposal did not include double garages as the façade, then the proposal would be compliant. Council officers are of the view that the proposal does not comply with the relevant performance outcomes of the code and in particular, the character and amenity of the area is not maintained. Demonstrate how the design can be changed to be consistent with character and amenity of the area.

Applicant Response:

Council's concerns in relation to compliance with the Tourist Accommodation Zone Code are acknowledged, particularly with respect to:

- Road boundary setbacks;
- Landscaping within the road boundary setback;
- Overall landscaping and recreation area provision;
- Site cover; and
- Presentation of the built form to the street, specifically the prominence of double garages.

We provide the following response and design changes to address the identified performance issues and demonstrate consistency with the intended built form, landscaping, character and amenity outcomes of the Tourist Accommodation Zone.

Road Boundary Setback and Landscaping

The building setback has been increased by 899mm, now 4,183mm to the Garage and the main building structure is setback greater than 6000mm. The development provides the necessary space to accommodate front landscaping, including screen planting and low-level garden beds that contribute to visual softening of the built form as illustrated on the amended plans included under Attachment I.

This modification allows the proposal to better align with Performance Outcome PO2 by providing a vegetated buffer between the street and built form, maintaining a subtropical character and reinforcing the landscaped streetscape that typifies the Port Douglas tourist precinct.

The amended plans illustrate additional landscaping opportunity within the road verge, which has been designed to be consistent with the established streetscape and contribute positively to the overall character of the locality. The landscaping arrangement is to be further designed and detailed and may be conditioned by Council.

Landscaping and Recreation Area Provision

The site layout has been reassessed with a focus on improving the balance between built form and private open space. Amendments include:

- Increase in total landscaped areas from 226m² to 242m².
- Enhanced planting along side boundaries and between dwellings to improve privacy, break up the bulk of built form, and contribute to local amenity.

The amended driveway layout has also been designed to reduce the visual prominence of hardstand areas but also contribute to improved amenity and consistency with the subtropical landscape character of the locality. The landscaping concept includes planting within the Davidson Street verge (consistent with existing plantings) which will enhance the presentation of the site to Davidson Street and contribute to a softened and well-articulated streetscape interface.

Site Cover

Although the proposed development results in a site cover of 60%, the design achieves the relevant performance outcome by maintaining a built form that is neither bulky nor visually obtrusive. The dwellings are single-storey and feature a high degree of articulation, including varied roof lines, recessed entries, and integrated landscaping elements such as elevated planters, and low-level planting throughout the front and side setbacks. Collectively, these design features ensure that the overall scale and presentation of the development is consistent with the low-rise character of the area and does not compromise visual amenity, despite the site cover.

Garage Dominance and Façade Presentation

Council's concerns regarding the prominence of garage doors as a dominant visual element in the façade are acknowledged. To address this, the following architectural design changes are proposed:

- Relocation of the garage doors further setback from the primary frontage, consolidating the dual access driveways and incorporation of additional landscape screening.
- The garages have been reduced by 400mm each.
- Widening of the pedestrian entries by 700mm and increased landscaped to reinforce pedestrian orientation over vehicle access. The design now incorporates a 3700mm wide living area with a 2579mm clear vision available to Davidson Street.

The garages are proposed to be supplied by Knotwood, a reputable manufacturer specialising in concealed garage door systems that deliver a seamless and architecturally refined appearance. Further refer to comments under Item 2 below.

These changes will enhance visual interest and align with PO3, ensuring that the built form contributes positively to the character and amenity of the tourist accommodation precinct and surrounding properties.

Character and Amenity

With the above amendments, the proposal now offers a high-quality architectural and landscape design response that is compatible with the surrounding character. The revised proposal achieves the following outcomes:

- A landscaped and softened interface with Davidson Street.
- A built form that is articulated, visually appealing, and consistent with the expectations for low-rise accommodation or dual occupancy dwellings in the zone.
- Appropriate private open space and planting opportunities for future occupants or guests, thereby contributing to a relaxed, subtropical environment consistent with Port Douglas' identity.

Item 2: Dual Occupancy Land Use Code

The proposal is not compliant with AO3.1 or PO3 of the Dual Occupancy Code. The two double garages occupy approximately 65% of the site lot frontage. The façade is not sympathetic to the streetscape pattern and is not consistent with the amenity of a residential area. The proposal provides limited opportunity for casual surveillance or streetscape engagement and is inconsistent with the streetscape pattern as there are no other developments in the locality with garages as the façade. Amend the design to provide for a sympathetic streetscape integration. This may be done by adding an additional storey with outlook to the street or reducing the double garages and introducing opportunity for causal surveillance on the ground floor.

Applicant Response:

The garage frontage has been reduced by 400mm for each dwelling (total reduction of 800mm across the overall site frontage), which reduces the presentation to the street and improves the visual balance of the overall built form.

The garages are proposed to be supplied by Knotwood, a reputable manufacturer specialising in concealed garage door systems that deliver a seamless and architecturally refined appearance. Unlike traditional Colorbond garage doors, which often present as visually dominant and utilitarian elements, the Knotwood system utilises flush-mounted aluminium battens designed to integrate into the surrounding façade. This results in a garage door that is effectively disguised within the built form, reinforcing the horizontal

geometry and achieving a continuous, linear design language across the frontage. The concealed nature of the system not only enhances the visual cohesion of the development but also contributes to a significantly more aesthetically pleasing streetscape outcome. This refined approach aligns with the architectural intent of the development and helps to reduce the perceived bulk of the garage frontage. For further details on the proposed product, refer to the supplier's website: <https://www.knotwood.com.au/garage-doors>.

We maintain that the amended design provides appropriate and effective opportunities for casual surveillance of the street, consistent with the principles of Crime Prevention Through Environmental Design. The pedestrian entries have been widened by 700mm to reinforce pedestrian orientation and promote visual and physical connectivity between the dwellings and the public realm. This modification enhances visibility and pedestrian legibility at the front of the site. In addition, the revised landscape layout has been designed to frame the pedestrian pathways and soften the driveway interface, further supporting a human-scaled, street-focused presentation.

Importantly, the internal living areas positioned at the front of each dwelling now incorporate a 3,700mm wide space with extensive glazing, including a 2,579mm clear view that directly overlooks Davidson Street. This configuration facilitates a high degree of passive surveillance, enabling unobstructed visual oversight of the street, footpath, and front setback areas. It is submitted that surveillance from an actively used living area provides a more effective and consistent level of street engagement compared to a balcony accessed from a bedroom, which is typically underutilised and less frequently occupied. This outcome is clearly demonstrated in the submitted Perspective Plans (extract below), which illustrate how the design reinforces visual connection and promotes a safer, more socially responsive interface with the public realm.



Other Comments

The amended driveway design achieves a safer and more functional outcome, as it allows vehicles to reverse within the site and exit in a forward gear. This design minimises the risk of vehicle-pedestrian conflict and improves visibility when entering the road reserve, thereby enhancing overall safety for both residents and passing traffic.

Thank you for your time and consideration of this Response to Information Request. If you have any further questions or issues please do not hesitate to contact the undersigned.

Regards,



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Attachment I

Amended Plan Set

RECS Consulting Engineers and Buildings Designers