urbis.com.au
Level 32, 300 George Street
Brisbane QLD 4000 Australia (Yuggera Country)
Urbis Ltd
ABN 50 105 256 228

BCC DS
RECEIVED
23/10/2026
APPLICATION REF
A006928686

21 October 2026

Brisbane City Council
Attn: Planning Services North
PO Box 1434
266 George Street, Brisbane City QLD 4000

Dear Jenny,

Response to Information Request - Development Application at 47 Linkfield Rd, Bald Hills Qld 4036 (Council Ref.: A006928686)

In accordance with Section 13.2 of the Development Assessment Rules and on behalf of *Banner Asset Management* ('**the Applicant**'), please find below a **full response** to the further advice request requested by Council on 8 September 2026 for the abovementioned development application.

Specifically, this correspondence provides a full response to **Items 1** to **Item 14**. The response is accompanied by the following supporting information:

- **Attachment A –** Council Further Issues Letter;
- **Attachment B** – Amended Architectural Plans;
- **Attachment C –** Civil Engineering Memo by *Acor*;
- **Attachment D –** Stormwater Management Plan by *Acor*;
- **Attachment E –** Engineering Services Report by *Acor*;
- **Attachment F** – MUSIC model by *Acor*;
- **Attachment G** – Revised Hydraulic Report by *Naxos.*;
- **Attachment H** – Response to Information Request – Traffic and Transport by *Urbis*; and
- **Attachment I** – Revised Noise Impact Assessment by *AE Environmental*.

Response to Information Request

Reticulated water/sewer servicing

1. *Section 3.1 of the Engineering Report prepared by Accor indicates a gravity sewer connection may not be achievable (outlining further potholing/survey investigations are required to confirm). The report also outlines if a gravity connection is not achievable the site is proposed to be serviced by private pumped sewer/onsite storage/pump-out arrangements. This proposed arrangement does not satisfy the requirement of reticulated sewer servicing as per Infrastructure design code AO9.1 and AO9.2. A gravity sewer system must be demonstrated as part of this development application (as opposed to the proposal within the Accor Engineering Report which is not supported). The proposed contingency (private pumped sewer/onsite storage/pump-out arrangements) is not supported.*

a. *Demonstrate the proposed subdivision can be serviced by reticulated sewer gravity feed and provide written consent/support from Urban Utilities (UU) for the reticulated strategy.*

Response:

In response to Item 1, the Applicant wishes to confirm that the proposed development will be serviced via a gravity sewer arrangement in accordance with the Infrastructure Design Code. The proposed solution is consistent with the supported solution provided by Urban Utilities (UU) in the previously provided Services Advice Notice (SAN). Additional details detailing how a gravity sewer solution can be provided and the SAN has been provided in the Civil Engineering Memo which is contained in **Attachment C.**

Stormwater code

2. The proposed subdivision plan indicates an easement (EMT B) within proposed Lot 6 for the overland flow/access to the drainage reserve. The use of an easement for this purpose is not supported.

a. *The land must be dedicated as drainage reserve as it conveys underground drainage from the road reserve, provides an overland flow path from the road reserve, and provides access for Council to carry out maintenance within the drainage reserve. Provide revised plans demonstrating the overland flow path/access will be dedicated as drainage reserve.*
b. *Additionally demonstrate that a maintenance berm is provided for vehicle access to the drainage reserve. The proposed outlet location at the drainage reserve may also impact the maintenance vehicle access to the drainage reserve. Demonstrate vehicle access to the drainage reserve is achievable with sufficient truncations.*

Response:

In response to Item 2, the drainage reserve and maintenance access arrangements have been revised to address Council's requirements.

In response to Item 2(a), the Applicant seeks to retain the relevant land within proposed Lot 6 and establish an easement in favour of Council, rather than dedicate the land as drainage reserve. The proposed easement would perform the same practical function as a drainage reserve by accommodating the overland flow path and providing Council with the necessary rights of access for inspection, maintenance and repair of the drainage infrastructure. It is preferred as an easement rather than drainage reserve to simplify future applications which will be required for the service station / lot 6 and may also require this land for a stormwater solution.

The easement terms can be drafted to secure Council's ongoing access and maintenance requirements, including appropriate rights for maintenance vehicles and restrictions on development or other activities that may impede drainage or access. This arrangement would therefore achieve the intended drainage and maintenance outcomes while retaining the land within proposed Lot 6 and preserving flexibility for its future development.

In response to Item 2(b), the stormwater outlet arrangement has been revised, with the headwall and associated outlet infrastructure relocated further east within the drainage reserve. This provides improved

vehicle access and manoeuvrability and allows maintenance access to occur without obstruction from the drainage infrastructure. The revised civil engineering plans demonstrate the amended drainage reserve, crossover and outlet arrangements. Confirmation of these arrangements is contained in **Attachment C**.

3. A retaining wall (RWB01 shown on preliminary bulk earthworks plan SK01-0001 issue B) is proposed along the proposed Lot 6 boundary. While a wall along this boundary could be supported to ensure overland flow is contained in the link from the road to the drainage reserve, the plans indicate the proposed wall is retaining no earth.

a. *Clarify this issue/show the fill on proposed Lot 6 being retained.*

Response:

In response to Item 3, the preliminary earthworks design identifies two retaining walls adjoining the proposed maintenance access corridor, each serving a separate function. RWB02 is proposed to retain fill associated with the future earthworks on Lot 6. The maintenance access corridor is required to grade down and tie into existing ground levels within the drainage reserve, with retaining structures provided where necessary to accommodate the resulting level differences between the access corridor and adjoining land.

The ultimate surface levels adjacent to the common boundary remain subject to the future amendment of the approved service station development.

Accordingly, the final extent and function of RWB01 will be confirmed through detailed design once the adjoining surface levels are resolved. The updated section includes the currently approved surface levels for the adjoining lot and clarifies the relationship between the retaining walls, maintenance access corridor and proposed earthworks. Confirmation of these arrangements is contained in **Attachment C**.

4. Retaining walls of significant heights (2-3m) are proposed along the waterway corridor and lot boundaries, which is inconsistent with AO1/AO2 of the Filling and excavation code. The significant retaining wall adjacent the waterway could be a source of CPTED issues (graffiti).

a. *Maintenance vehicle access to and along the drainage reserve is required to be demonstrated and justified for the proposed performance outcome as per the Filling and excavation code.*

Response:

In response to Item 4, the stormwater outlet and discharge point have been relocated further east to facilitate maintenance vehicle access along the drainage reserve. The revised arrangement allows maintenance vehicles to traverse the existing ground levels adjacent to the waterway corridor and provides access for ongoing maintenance activities, including asset inspections and graffiti removal.

The retaining walls are located adjacent to the waterway corridor and drainage reserve rather than adjoining residential properties, thereby limiting potential visual amenity impacts. The proposed wall heights are primarily driven by the engineering requirements associated with achieving the necessary development levels, drainage outcomes and maintenance access arrangements. The revised Filling and Excavation Code assessment provides further justification for the proposed wall heights and demonstrates how the development responds to the applicable performance outcomes. Confirmation of these arrangements is contained in **Attachment C**.

5. The stormwater management plan (SWMP) on the site has been revised regarding the management of the upslope property flows. The proposal to capture and pipe the Q100 flow is not supported, as per Council's Infrastructure design Planning Scheme Policy (PSP). A flow path within an easement/s is to be provided directing the major flows to the drainage reserve. The major flow path should be provided along the northern site boundary, directing/connecting the flows to the proposed drainage reserve.

a. Provide a revised SWMP to ensure a flow path is provided for the major flows directing/connecting the flows to the proposed drainage, with the minor flows piped.

Response:

In response to Item 5, the Applicant has commissioned ACOR Consultants to revise the Stormwater Management Plan and assess Council's requested major overland flow path along the northern site boundary. The Stormwater Management Plan is contained in **Attachment D**.

The assessment identifies that a continuous northern flow path is not supported by the existing topography. Localised sag points and crests along the western site boundary prevent the continuous conveyance of major flows to the north, while the existing topography generally directs flows from west to east. Raising the site to remove these existing low points is not considered appropriate, as the development is required to accept and convey external catchment flows entering from the west and such works may adversely affect upstream flood behaviour.

The proposed stormwater strategy has therefore been developed to respond to the existing flow regime and incorporates duplicated inlet capacity and an underground drainage network sized to convey the 1% AEP event. A conceptual complete-blockage assessment has also been undertaken, which assesses the resulting ponding conditions, effects on adjoining properties and freeboard to the proposed warehouse floor levels. Under the assessed blockage scenario, flows accumulate toward the northern extent of the development before spilling over the crest and ultimately discharging to the drainage reserve.

The revised Stormwater Management Plan also identifies the inspection and maintenance requirements for the open drainage corridor following significant storm events. A maintenance management plan may be implemented for the affected lots to further manage the risk of blockage throughout the life of the development.

Flood overlay code

6. The hydraulic report prepared by NAXOS outlines a different flood level (8.1m AHD) to the previously approved flood level of 8.40m AHD for A006105836. The report should include a Manning value of 0.15 for the revegetated waterway.

a. Confirm the manning value of 0.15 has been utilized in the model and RPEQ comment on the change in flood level is required.

Response:

In response to Item 6, the Applicant has commissioned NAXOS to prepare a revised Hydraulic Report which considers the change in flood level. The revised report is included as **Attachment G** and provides the rationale for the divergence from the previously approved flood mitigation strategies and subsequent elected flood level. The report also confirms that a manning value of 0.15 has been utilised as requested.

With respect to the variance in the flood levels, NAXOS advises that the difference in results is largely due to the updated LiDAR terrain data used in the newer model assessment. The original report was based on the 2014 LiDAR data, whereas the new report uses the more recent and accurate 2023 LiDAR data' in addition to more recent and relevant modelling techniques.

7. The provided hydraulic report prepared by Naxos outlines flood planning levels for the proposed Material change of use (MCU), however the hydraulic report does not address the subdivision component of the proposal.

a. Revise the hydraulic report to include/confirm the proposal achieves the required planning levels for proposed roadways and allotments, in accordance with the Flood overlay code. It is noted the road level is currently proposed at 10.5m AHD to 11.7m AHD. The flood immunity level of the lots and road is likely compliant, but the report needs to be revised to outline the minimum flood immunity level for the lots and road as per the Flood overlay code are met.

Response:

In response to Item 7, the Applicant has commissioned NAXOS to revise the Hydraulic Report to assess the ROL component of the proposal. The revised report is included as **Attachment G** and demonstrates that the proposed allotments achieve the required minimum flood immunity level of RL 8.20m AHD. The assessment also confirms the proposed road levels of RL 10.5m AHD to RL 11.7m AHD exceed the required flood immunity level and that the proposed allotments are located above the modelled flood extent to the extent that compliance is achieved with the Flood Code.

New Road

8. The plans have been revised to now provide an interim turn arrangement of a cul-de-sac head, partially within proposed Lot 5 (within an EMT). While the arrangement can be supported in principle, please clarify:

a. Proposed plan 25169-DA09 prepared by Verve Design Group appears to only show the pavement extents within the proposed EMT (verge area excluded). Demonstrate a minimum 2.5m verge is within the EMT extent.
b. Confirm any/all services associated with the potential future extension of the road (including telecoms and electrical) will be within the ultimate road reserve and not in the EMT extents.

Response:

In response to Item 8, the Applicant has amended the development in order to facilitate the provision of services within the road reserve as requested. Moreover, the revised Architectural Plans prepared by Verve (included as **Attachment B**) demonstrate the minimum requested 2.5m verge as requested.

Parking Provisions

9. The RPEQ comments regarding the proposed Lot 4 MCU use parking demand have been reviewed. The presented performance outcome is an improvement on the prior layout (particularly with the removal of parking in front of roller doors). However, the proposed parking spaces within the building/units (on proposed Lot 4) are not supported. It is noted that the area of internal building spaces has been excluded from the Gross Floor Area (GFA) calculation used for parking calculations, the report states the units are approximately 80- 90m2 GFA and appears to disregard

the mezzanine areas. The below items are to be addressed with revised plans and revised RPEQ reporting:

a. *Remove the internal building car spaces from the plans.*

b. *Include the mezzanine areas in the GFA calculation and outlining clear limitations on the extent and use of the mezzanine for ancillary use.*

c. *It is recommended removal of the end unit on the central aisle to produce a supportable outcome to the site's parking provision through the removal of GFA and opportunity of additional spaces in this area.*

Response:

In response to Item 9, the Applicant has revised the Lot 4 layout in accordance with Council's requested amendments. The revised Architectural Plans and Traffic and Transport Response are included as **Attachments B and H**, respectively.

In response to Item 9(a), all car parking spaces internal to the proposed tenancies have been removed as requested.

In response to Item 9(b), the mezzanine areas have been included in the GFA and car parking calculations. Lot 4 now comprises 15 tenancies with a total GFA of 2,045 m², including 1,374 m² of ground-floor GFA and 671 m² of mezzanine storage GFA. The mezzanine areas are intended to remain ancillary to the respective tenancies, and this outcome may be secured through an appropriately worded condition of approval.

In response to Item 9(c), the end tenancy along the central aisle has been removed as requested, reducing the overall GFA and enabling the provision of additional on-site car parking. The revised layout provides 28 car parking spaces, with the Traffic and Transport Response confirming that the amended parking arrangement complies with Council's TAPS policy and AS 2890.1. Accordingly, the proposed quantum of 28 on-site car parking spaces is considered supportable for the revised development.

Noise Emissions

10. The Noise Report Revision R1 by Assured Environmental 12/6/26 Project ID 18001 Release R1 has been reviewed, and the following information is required to clarify the assessment methods:

a. *Confirm if tenancies in Table 6 would operate from 6AM – 7PM. The table mentions 100% usage at night, with night being from 10PM – 7AM and the proposed hours are only for 6AM – 7PM in the remainder of the report and the rest of the application.*

b. *Revisit the criteria in Table 16 as these appear inconsistent with the report which uses the correct criteria.*

c. *Advise if the roller doors are open or closed in the assessment.*

Response:

In response to Item 10, the Applicant has commissioned Assured Environmental to prepare a revised Noise Impact Assessment which is included as **Attachment I.**

In response to Item 10(a) the Applicant confirms that all tenancies will only operate between 6:00am and 7:00pm which is identified in Table 7 has been updated to reflect the proposed operating hours and associated utilisation rates. The revised assessment demonstrates compliance with the applicable operational and sleep disturbance noise criteria at all assessed sensitive receptors.

In response to Item 10(b), the Applicant confirms that Table 16 has been amended accordingly to be consistent with the assessment and findings of the Noise Impact Assessment.

Lastly, in response to 10(c), the Applicant confirms that the roller shutter doors are intended to remain closed during operation as a noise mitigation measure. This assumption has been incorporated into the noise modelling and documented within the revised report. Conditions of approval and on-site management strategies can be implemented to ensure that the use is conducted in accordance with the Noise Impact Assessment if necessary.

Stormwater quality

11. Refer to Figure 15 of the Stormwater Management Report Revision 3 dated 23/6/26 by Acor Consultants and submit this overall treatment plan in a digital format (MUSIC model).

Response:

In response to Item 11, the MUSIC model has been provided and is included in this lodgement package, included as **Attachment F**.

Acid sulfate soils

12. Refer to Table 5.10.15—Potential and actual acid sulfate soils overlay. If the proposed development causes disturbance equal to or less than 5m AHD, provide a response to the Potential and actual acid sulfate soils overlay code and:

a. An Acid Sulfate Soils (ASS) Investigation Report and Management Plan prepared by an appropriately qualified and experienced person, and prepared in accordance with relevant policies/guidance materials and technical guidelines/manuals such as:

i. State Planning Policy and SPP Guidance Materials;

ii. Queensland Acid Sulfate Soil Guidelines: sampling guidelines; laboratory methods guidelines/manuals; and

iii. Queensland Acid Sulfate Soil Technical Manual: Soil Management Guidelines.

Response:

In response to Item 12, the Applicant requests that the requirement for an Acid Sulfate Soils Investigation Report and Management Plan be addressed through the inclusion of an appropriately worded condition of approval. The required investigation and management plan would be prepared by a suitably qualified person, in accordance with the relevant guidelines, prior to any disturbance of land at or below 5m AHD.

Refuse area within ecological overlays

13. The amended Proposed Site Plan indicates that the proposed refuse storage area is partially located within the mapped Waterway Corridors Overlay and Biodiversity Areas Overlay. This location is not considered suitable and conflicts with the outcome and intent of the respective codes. The refuse storage area is to be relocated wholly outside of the mapped ecological overlays.

a. Provide amended plans which show the refuse area wholly the mapped Waterway corridors and Biodiversity areas overlays

Response:

In response to Item 13, the Applicant has amended the design of the proposal to accommodate the refuse area outside of the sensitive overlay area(s) as requested. Please refer to the revised Architectural Plans prepared by Verve (included as **Attachment B)**.

Inconsistency with existing approval A006105836

14. Council is unable to support proposed development conflicting with the existing development approval for the Service station (A006105836). The proposed plans show a different layout, carparking arrangement, access, and potential impacts to the landscaping.

a. Either a change application to A006105836 or amended proposal plans are required to demonstrate the proposed development proposal aligns with the approved Service station.

Response:

In response to Item 14, the Applicant appreciates Council's concerns regarding the relationship between the two developments on site. It is acknowledged that elements of the proposed development are not consistent with the existing service station approval (Council Ref. A006105836). A minor change would be required to alter this approval in order to be carried out concurrently with the current proposed development, and it is intended that this will occur in due course. As currently proposed, both development approvals may exist independently of each other until such time that one is carried out, which would then render the other incapable of being carried out without a change application.

On this basis, Council is requested to continue assessment of the proposed application on its merits. An appropriate condition of approval can be implemented if deemed necessary to secure this outcome.

Summary

This correspondence constitutes the total extent of our response to the further issues request made by Council in accordance with section 13.2 (a) of the Development Assessment Rules. We ask that Council progress the assessment of the application on that basis.

If you have any questions regarding the above or attached material, please do not hesitate to contact the undersigned or **Adam Donaldson (Senior Consultant)** on 3007 3800.

Yours sincerely,



Michael Cattoni
Director
+61 7 3007 3850
mcattoni@urbis.com.au