



24 August 2026

Brisbane City Council
PO Box 1434
Brisbane QLD 4001

Attn: Kayal Chandrasekar

Via email: Kayal.Chandrasekar@brisbane.qld.gov.au

RE: A006940193/184 & 198 GARDNER RD & 56 FARLEY RD, ROCHEDALE, 4123 - RESPONSE TO INFORMATION REQUEST

Application Details

Applicant	Gardner Rd Developments Pty Ltd C/- The Development Directive Pty Ltd
Land Owner	Gardner Rd Developments Pty Ltd
Application Number	A006940193
Application Address	184 Gardner Road, Rochedale, QLD 4123 198 Gardner Road, Rochedale, QLD 4123 56 Farley Road, Rochedale, QLD 4123

Dear Kayal,

We write to you on behalf of Gardner Road Developments Pty Ltd (**the Applicant**) and provide a full response to the Information Request issued by Brisbane City Council (**Council**) and dated 13 April 2026. This response is provided pursuant to section 13.2(a) of the Development Assessment Rules (**DA Rules**).

Each item from Council's Information Request has been outlined below along with the corresponding response. The Applicant's response should be read in conjunction with the following supporting technical documentation:

- Attachment 1: Revised ROL & Staging Plan, prepared by Therefor Group;
- Attachment 2: Amended Table of Variation, prepared by Development Directive;
- Attachment 3: Economic Needs Assessment, prepared by Uplift Economics;
- Attachment 4: Air Quality Assessment, prepared by MWA Consulting;
- Attachment 5: Landfill Gas Assessment, prepared by ADG Consulting;
- Attachment 6: Noise Impact Assessment, prepared by MWA Consulting;
- Attachment 7: Industrial Amenity Noise Assessment, prepared by MWA Consulting;
- Attachment 8: Bushfire Assessment Report, prepared by Therefor Group;
- Attachment 9: Engineering Response Letter, prepared by Arcadis;
- Attachment 10: Interim & Ultimate Structure Plan, prepared by Therefor Group;
- Attachment 11: Traffic Engineering Response, prepared by SLR Consulting;
- Attachment 12: Access Sightline Plans, prepared by Arcadis;
- Attachment 13: Ecological Response Letter, prepared by BAAM Ecology;
- Attachment 14: Vegetation Management Plan & Rehabilitation Plan, prepared by BAAM Ecology;
- Attachment 15: Flood Impact Assessment, prepared by ADG Engineers;
- Attachment 16: Preliminary Dewatering Plan, prepared by BAAM Ecology;
- Attachment 17: Wildlife Management Plan, prepared by BAAM Ecology;
- Attachment 18: Additional Code Responses, prepared by Development Directive.

We trust the provided information adequately addresses Council's Information Request. We advise that Council should proceed with their assessment of the subject development application in accordance with section 13.3 of the DA Rules.

If you have any questions regarding the attached material, please do not hesitate to contact the undersigned on 0452 226 254 or at lachlan@developmentdirective.com.au.



Yours sincerely,

Lachlan Macgregor
Director

The Development Directive Pty Ltd





VARIATION REQUEST

1. *Submit amended plans and assessment material to address the following matters:*

- a. *Indicate all proposed easements and include annotations and further information on the purpose of all easements;***

Applicant Response:

The proposal plans have been amended to show all easements (refer to Attachment 1). Details on each of the proposed easements are outlined below:

- Easement 1 & 3 : Proposed Access Easement
- Easement 2, 4, 5 & 6: Proposed Sight Restriction Easements

- b. *Lot 14 is referenced in the assessment material, however not shown on proposed plans;***

Applicant Response:

It is noted that the proposal does not contain a 'Lot 14', and rather the proposed Lots have always been referenced as Lots 1, 2, 3, 4, 5, 6, 13, 15, 16, 17, 18, 19, 904 and 905 (total of 14 lots). Any references to Lot 14 were human error and incorrect as Lot 14 is proposed only as a part of development application A006761597. Refer to Attachment 1 for a copy of the Reconfiguration of a Lot Plans.

- c. *Submit amended DA forms to reflect the correct number of lots for the reconfiguration of a lot aspect of the development;***

Applicant Response:

The details outlined in the original DA Form 1 are still correct and therefore, an Amended DA Form is not required to be submitted.

- d. *Ensure consistent lot numbering and details between the proposed ROL plans and other documentation including engineering and ecological plans; and***

Applicant Response:

All plans and reporting submitted as a part of this response have been updated to ensure consistency on lot numbering and details.

- e. *Submit amended assessment report with correct lot references in the Variation request table as Lot 13 is identified in the Low impact industry zone category of development.***

Applicant Response:

An amended Variation Request table has been provided in Attachment 2. We trust that this is sufficient for Council's consideration and assessment. To clarify, Lot 13 is proposed to be identified in the Low-Medium Density Residential Zone.

- 2. *The proposal, in addition to the subdivision request, seeks to vary the zoning of a part of proposed Lot 13 to the Low-medium density residential zone. The following items need to be addressed to progress the assessment of the variation request:***

NEEDS ASSESSMENT

- a. *Provide an Economic report that includes a needs analysis that demonstrates there is a 'planning need' for the proposed Low-medium density residential zoned land and that the loss of the Business Park and Civic Gateway (NPP-003) precinct will not impact long term employment opportunities being provided in Rochedale in accordance with Overall outcome 3(d), 6(a), 6(b)(i) Rochedale urban community neighbourhood plan (RUCNP). Upon receipt of the needs report, a separate fee quote will be issued based on Development assessment and compliance fees schedule, for assessment of the report.***



Applicant Response:

A detailed Economic Needs Assessment (ENA) has been undertaken by Uplift Economics and is provided in Attachment 3. The analysis undertaken in the ENA clearly demonstrates that the Rochedale Housing Market is experiencing a significant, immediate, and growing housing crisis and that there is an urgent need for more housing.

Should all development applications lodged with Council associated with the Site be approved, the proposed development would represent a significant investment in the local community and economy and could deliver:

- 135 new homes (approximately 4.01% of the additional housing supply required in the Rochedale Housing Market to 2041)
- 445 new residents to live within Rochedale
- 79 new low-impact industrial jobs
- +\$84.38 million worth of construction activity to deliver the new homes and low-impact industrial buildings

The development will also deliver the construction of new trunk infrastructure which would help facilitate and encourage the development of surrounding underutilised land. The development of a new trunk collector road bisecting the Site would provide a critical east-west connection from Gardner Road to Rochedale Road. The new road and associated infrastructure (sewer) are necessary to service and support the land surrounding the Site. Delivery of the trunk infrastructure can help bring forward the development of the surrounding underutilised land and help Council achieve its long-term vision for Rochedale.

Key assumptions regarding housing supply and demand underpinning the strategic planning and policy framework across Rochedale, Brisbane, and South East Queensland have changed radically in recent years. The framework never anticipated the direct and indirect economic and demographic impacts of events such as the COVID-19 pandemic, domestic and international migration controls, economic disruption driven by digital technologies, rapid inflation and the worsening housing crisis. Until the strategic planning and policy framework is updated to account for and respond to the above, its ability to effectively meet housing needs at the local and regional levels is challenged.

Overall Outcome 3(d), 6(a) and 6(b)(i) of the Rochedale Urban Community Neighbourhood Plan (RUCNP) are as follows:

3(d) - The range of commercial areas maximises the opportunities for local employment, to provide superior business settings and cluster compatible businesses and services.

6(a) - This precinct accommodates specialised employment opportunities within Rochedale.

6(b)(i) - This sub-precinct forms a buffer area between the Rochedale landfill, the future industry area and residential areas. It accommodates high amenity and low impact industry. Ancillary uses such as cafes are consistent with the outcomes sought. Stand-alone office or retail uses are not consistent with the outcomes sought.

The proposed development has been designed to ensure that proposed land uses are co-located with existing land uses/ zoning designations in the area, by situating low impact industry and warehouse uses in the north western portion of the site and residential uses adjoining recently approved residential areas and future district park along Rochedale Road. The proposed development will deliver a range of social and economic benefits to the local and regional community, including:

- Support improved housing supply and unlocking development potential of surrounding areas
 - 135 dwellings proposed
 - The proposed trunk infrastructure will support the construction of up to 1,335 new homes and 300,800m² of employment land
- Delivering on housing need and affordability
- Provide significant direct investment in the local area
 - The construction phase will directly invest +\$84 million into the local economic
- Providing access to jobs
- Increased economic activity in the local and regional area.
- Increased retail expenditure
- Activate an underutilised site
- Unlocking development potential



AIR QUALITY AND NOISE IMPACTS

- b. The site is located within the Industrial amenity investigation area sub-category of the Industrial amenity overlay. As compliance with the separation distances cannot be achieved as per PO2 and PO3 of the Industrial amenity overlay code, submit the following:**
- i. Submit an Air quality report prepared in accordance with the Air quality planning scheme policy to demonstrate compliance. When modelling for the air quality impacts, it must be for the future expansion of both the Austral Brick site and the Cogeneration plants located at the adjacent landfill site. The modelling to consider Cogeneration operation at the landfill site at 174 Gardner Road, Rochedale is slated for expansion and upgrades in the future. Odour must also be taken into account for the modelling.**
 - ii. Submit further information including assessment of the Industrial amenity overlay code, demonstrating the proposed use can comply with the separation distances as prescribed in AO3 of the Industrial amenity overlay code. Where compliance with the separation distances cannot be achieved, submit for approval a Noise impact assessment report in accordance with PO3 of the Industrial amenity overlay code. Further guidance can be found in the Noise impact assessment planning scheme policy.**

Applicant Response:

A Noise and Air Quality Impact Assessment has been prepared by MWA Environmental and is provided in Attachment 4. It is noted that this report has been produced in response to this information request and in relation to the Council information request issued for development application A006761597.

The reporting has assessed the potential impacts of the nearby Austral Brick Facility and Rochedale Landfill sites and includes assessment for future expansion of both facilities. Furthermore, an assessment against PO2 and PO3 of the Industrial amenity overlay code has been provided within the report and is summarised below. When responding to the items of the Industrial amenity code, it is important to note that the separation distance requirements are the same for AO2 and AO3. Refer to the table below which provides an excerpt of the relevant PO/AOs under the code.

Performance Outcome	Acceptable Outcome
PO2 <i>Development is located, designed and constructed to achieve the air quality (planning) criteria in Table 8.2.13.3.B, odour criteria in Table 8.2.13.3.C and health risk criteria in Table 8.2.13.3.D.</i> <i>Note—An air quality impact report prepared in accordance with the Air quality planning scheme policy can assist in demonstrating achievement of this performance outcome.”</i>	AO2 <i>Development for a sensitive use is located no closer than the distance stated in Table 8.2.13.3.G.</i>
PO3 <i>Development is located, designed and constructed to achieve the noise (planning) criteria in Table 8.2.13.3.E to protect the development from adverse noise impacts.</i>	AO3 <i>Development for a sensitive use is located no closer than:</i> <i>a. 150m to a medium impact industry A or sewage treatment plant;</i> <i>b. 250m to a medium impact industry B, waste transfer station or landfill;</i> <i>c. 500m to a high impact industry or special industry.”</i>

Pursuant to Table 8.2.13.3.G, the prescribed minimum separation distance is 250m for Medium Impact Industry established uses and 500m for High Impact Industry established uses. The report has reviewed the adjoining land uses and noted that the separation between the Low-Medium Density Residential



land and Austral Bricks Facility is 700m to the manufacturing plant and 300m to the raw material storage area. Furthermore, the separation to the Landfill site operations is 340m to the landfill gas engines.

The proposed development does not meet the required separation distances identified in AO2 and AO3 and therefore, compliance is sought with the respective Performance Outcomes.

The site is located 200 metres from the nearest boundary of the Rochedale Landfill site. This is 50 metres short of what is required to meet the separation distance from a Medium impact industry B use to meet the requirements of AO2 and AO3. Importantly, the landfill gas engines are located 340 metres from the proposed Low-medium density residential areas on the site.

In regards to the Austral Bricks site, the nearest boundary of the Austral Bricks site is located 365 meters from the Low-medium density residential area on the subject site. This is 135 meters short of the 500m separation distance required for a High impact industry use. Notwithstanding this, it is important to add that the proposed use is located 700m from the kiln stacks which constitute the High impact industry use.

The findings of the Air Quality Report Assessment of the proposed development confirms that the proposed development will meet the relevant Industrial amenity overlay code air quality (planning) criteria and therefore, can comply with PO2 of the code

Furthermore, the findings of the Noise Impact Assessment confirms that the proposed Low-medium density development can meet the Noise (planning) Criteria of Table 8.2.13.3.E, with the inclusion of the following requirements:

- A 2.0 to 2.4 metre high acoustic barrier along the northern boundary of the future multiple dwelling lots 13 and 904 with part returns along any future access driveways (see Figure 4);
- Acoustic treatment is to be provided to upper level façades of the future multiple dwellings to achieve a minimum noise reduction of 20 dB(A). Mechanical ventilation is to be incorporated into habitable rooms and bedrooms on these levels to maintain acoustic performance with windows closed.

From an odour perspective, MWA Environmental have undertaken a conservative worst-case cumulative assessment of Austral Bricks and the Rochedale Landfill operating at their respective licence limits and have determined that the relevant CityPlan 2014 Industrial amenity overlay code air quality (planning) criteria and odour criteria will be satisfied at the subject site.

LANDFILL GAS MIGRATION

- c. ***The site is in proximity of Rochedale landfill site, which may result in Landfill Gas Migration and Site Contamination. The development therefore needs to demonstrate that the proposal would not expose people to unacceptable levels of risk to health, safety and wellbeing from sub-surface landfill emissions, including landfill gas, contaminated groundwater or leachate.***
 - i. ***Engage a Contaminated land suitably qualified person (SQP) and/or a Registered Professional Engineer of Queensland (RPEQ) with experience in contaminated land investigations, closed landfill assessment, landfill gas risk assessment, and landfill gas management system design. The Queensland government has a guideline on Assessing a suitably qualified person, which can be viewed at: https://environment.des.qld.gov.au/__data/assets/pdf_file/0030/89823/cl-glassessingsuitably-qualified-person.pdf. The Australian Contaminated Land Consultants Association Queensland Division also maintains a webpage of companies who are ACLCA Qld members, companies that can demonstrate their primary business is contaminated land consulting, companies that have substantial practice in land contamination management with specialist environmental staff, and companies that have at least 1 staff member that is a Suitably Qualified Person in accordance with the Environmental Protection Act 1994: <https://aclca.com.au/qld/our-members-qld/>***
 - i. ***Conduct a Preliminary Site Investigation in accordance with the National Environment Measure (Assessment of Site Contamination) Measure 1999 (as amended in 2013) (NEPM) including the following details: As part of the Preliminary Site Investigation, the SQP will include undertake historical aerial photography***



review for the Site and will confirm that the site has been subjected to previous site disturbances / ground surface changes / historical filling / historical cropping, farming, and/or market garden activities / historical building demolitions / historical vegetation removals onsite (based on my review disturbance / change observations in historical aerial imagery, includes but is not limited to 1946, 1995, 1997, 1999, 2001, 2005, 2013, 2015, July 2017, 2019, 2021, 2023 and 2025);

As part of the Preliminary Site Investigation, the SQP will also conduct a Landfill Gas Risk Assessment (LGRA), given the development site's proximity to the Rochedale Landfill Facility.

The Landfill Gas Risk Assessment will be conducted in accordance with the adopted industry best practice guidance in Australia – i.e. Assessment and management of hazardous ground gases – Contaminated Land Guidelines – NSW EPA – May 2020 (<https://www.epa.nsw.gov.au/-/media/epa/corporatesite/resources/contaminatedland/19p2047-hazardous-groundgasesguidelines.pdf?la=en&hash=877EF007BFDEAF5163431351EB3C5A73FCBF7EFE>)

Note: If the Preliminary Site Investigation identifies the potential for unacceptable levels of risk to health, safety and wellbeing from sub-surface landfill emissions (including landfill gas, contaminated groundwater or leachate) additional onsite intrusive investigations may be required to delineate the contamination via a Detailed Site Investigation. If contamination risks are identified Contaminated Land SQP advice may be required to manage the workplace, health and safety requirements in design of the development, as well as management of these contamination risks during construction and environmental risks into the future. A Preliminary Site Investigation Report is to be prepared and submitted to Council.

Note: the Contaminated Land Suitably Qualified Person (SQP) will have experience and expertise in contaminated land and closed landfill assessment, landfill gas risk assessment, contaminated land risk mitigation, and design of infrastructure interacting with contaminated soil, leachate, waste, and landfill gas to conduct the following:

- a. Assess the contaminated land conditions (contamination, waste, leachate level, landfill gas) relating to the proposed ground disturbance areas and likely construction methods to build the proposed development.
- b. Provide recommendations for applicable relevant construction and contaminated land / landfill rehabilitation works, integrating designs for building footings, slabs, pavement, car park surfacing and utilities services, infrastructure trenches, etc with remediation and risk mitigation measures, such as low permeable capping, low permeability landfill gas trench bunds, management of potential leachate discharges, management of constraints associated with a geotechnically unstable waste pile, and mitigation of preferential pathways for landfill gas into services and buildings.
- c. Confirm and secure any approvals for sampling and characterisation of spoil management and contaminated soil disposal requirements of the project. - Prepare a Contaminated Land Management Sub-plan for the Construction Environmental Management Plan (CEMP) to manage contamination risks (e.g. from buried waste including asbestos, contaminated soil, leachate, landfill gas, confined space entry risks, etc) so as to protect workers and the environment.
- d. Prepare a Validation Report confirming the design and construction of the works were in accordance with recommendations and attach any associated designs, as-constructed plans, approval documentation, construction photos and supporting information for buildings and all services.

Applicant Response:

A Landfill Gas Migration Advice Letter has been prepared by ADG Consulting and is provided in Attachment 5. As detailed in the advice letter, a Landfill Gas Risk Assessment (LGRA) has previously



been prepared for the locality by ADG Consulting for an adjoining development. The LGRA findings suggest that a qualitative risk assessment for LFG migration indicated a typical risk rating of very low to low. Furthermore, the site is found to not likely be hydraulically downgradient of the Rochedale Landfill and credible potential preferential pathways for transmission of leachate-impacted groundwater or gases have not been identified at the time of this reporting. The wet to moist soil profiles within the site are also likely to inhibit transmission of ground gases through soil pore spaces.

The above findings suggest that the sites have a very low (negligible) potential of being impacted by landfill gas or leachate migration from the BCC Rochedale Landfill and that further ground truthing is unnecessary.

3. ***The proposed variation also seeks to allow future Low impact industry and Warehouse uses over lots 1,2,3,4,5,6,15,16,17,18,19 and 905. The following items need to be addressed to progress the assessment of the variation request:***

AIR QUALITY AND NOISE – INDUSTRIAL IMPACTS

- a. ***The proposed Low impact industry and Warehouse uses and its location have the potential to impact on the noise amenity of previously approved sensitive uses/zones and existing adjoining and nearby residential developments. Demonstrate that an adequate level noise and air quality outcomes as per the Industry code and Industrial amenity overlay code can be provided at such locations. Submit further information demonstrating that the proposed uses can comply with the hours and separation distances as prescribed in AO2.1 of the industry code and PO2 and PO3 of the Industrial amenity overlay code. Where compliance with the hours and separation distances cannot be achieved, the applicant is to submit for approval a Noise Impact Assessment Report prepared in accordance with the Noise impact assessment planning scheme policy, demonstrating compliance.***

Applicant Response:

MWA Environmental have a Noise Impact Assessment and Industry Amenity Review in response to this information request item, which is provided in Attachment 6 and 7 respectively. A response to PO2 and PO3 requirements under the Industrial Amenity Code are outlined in the Applicants response to Item 2 of this Information Request. However, compliance with AO2.1 of the Industry Code is outlined below.

AO2.1 of the Industry Code states: *'Development for a warehouse in the Low impact industry zone or General industry A zone precinct of the Industry zone:*

- a. *operates:*
 - i. *between 7am and 7pm Monday to Saturday excluding public holidays; or*
 - ii. *so it is not clearly audible from a residential zone, or a sensitive use in a centre zone;*
- b. *is conducted wholly indoors except where located a minimum of 250m from a sensitive zone;*
- c. *does not receive deliveries between 7pm and 7am."*

The proposed development seeks to establish industrial land which allows for Low Impact Industry and Warehouse uses on the site. The proposed hours of operation for all industrial land is proposed to be 24 hours 7 days a week. The proposed development does not meet the requirements of AO2.1 and assessment against Performance Outcome 2 is required, which specifically states:

"Development complies with the noise (planning) criteria in Table 9.3.12.3.E, low frequency noise criteria in Table 9.3.12.3.F and night-time noise criteria in Table 9.3.12.3.G."

The Noise Impact Assessment has assessed the noise criteria for both the residential and industrial land uses on the site and has found that the development can achieve the criteria, with the inclusion of the noise control measures:

- A 2.0 to 2.4 metre high acoustic barrier along the northern boundary of the future multiple dwelling Lots 13 and 904 with part returns along any future access driveways



- A 3.0 metre high acoustic barrier / wall on the eastern side of the future industrial buildings / hardstand on Lot 905.
- Upper Level habitable rooms of future multiple dwelling uses on the Low-Medium Density Residential Lots 13 and 904 are to be provided with air-conditioning and/or mechanical ventilation to allow doors / windows to be closed by residents if desired.
- External facades of Upper Level habitable rooms of future multiple dwelling uses on the Low-Medium Density Residential Lots 13 and 904 are to meet specific construction and glazing requirements. Refer to Attachment 7 for further detail.
- Design of future industrial buildings adjacent to the multiple dwelling lots (Lots 2, 3 and 905) to have large openings (roller doors) and hardstand areas facing away from the multiple dwelling lots.

In relation to the air quality assessment, MWA have detailed within their report and referred to the planning scheme definitions which outline that a low impact industry land uses is described as ‘*an activity which has negligible impacts on sensitive land uses due to off-site emissions including aerosol, fume, particle, smoke, odour and noise*’. Accordingly, the planning scheme’s definitions for low impact industry and warehouse places restrictions on the intensity of industrial activities and the requirement for these activities to generate negligible off-site emissions, significantly minimises the potential for air quality impacts from the proposed Warehouse and Low Impact Industry allotments at existing, approved and proposed sensitive zones / uses on adjacent properties. In order to ensure that air quality impacts from future warehouses or low impact industry uses at the development are effectively managed and/or mitigated, MWA have recommended that the development approval impose specific conditions to:

- Restrict the Warehouse and Low Impact Industry uses on proposed Lots 1-6, 15-19 & 905 to uses that do not generate off-site air pollutant or odour emissions with the potential to impact sensitive land uses; and
- Require all trafficable areas be sealed.

The Applicant is willing to accept a condition restricting future industrial uses to the effect as outlined above. Where a future tenant/ use cannot comply with this condition, it will be subject to a separate development approval in accordance with the City Plan.

CATEGORIES OF DEVELOPMENT AND ASSESSMENT

4. ***Any future development application under a Variation approval must utilise the existing assessment benchmarks within City Plan 2014. Given this, provide categories of development and assessment for a Material change of use using City Plan 2014 for all intended Code assessable uses. Where the separation distances in the Industry code cannot be achieved, provide additional information to demonstrate why the intended Code assessable uses are appropriate.***

Applicant Response:

An amended Table of Variation is provided in Attachment 2. It is noted that the proposal seeks to replicate the existing assessment benchmarks within the City Plan 2014, to ensure continuity with the relevant provisions of the strategic framework.

As discussed in the response to Item 2 and 3 of this information request, Air Quality and Noise Impact Assessment reporting prepared by MWA Environmental has confirmed that low impact industry, warehouse and low-medium density residential uses can occur with relevant performance outcomes. Refer to Attachment 6 and 7 for further detail.

ORDERLY AND INTEGRATED DEVELOPMENT

5. ***The assessment material indicates that the proposed lots 17, 18 and 19 are intended to be serviced by a temporary access easement from Gardner Road, with the Engineering plans showing a cul-de-sac arrangement within lot 19. The proposed arrangement with one point of access/egress is particularly vulnerable to bushfire hazard and therefore not considered to comply with AO17/PO17 and AO18.2/PO18 of the Bushfire overlay code as noted in item 22. Submit further information addressing the following items:***



- a. Demonstrate how the proposal can comply with the bushfire overlay code regarding the proposed temporary access via an easement as noted in item 22;**

Applicant Response:

An amended Bushfire Assessment Report has been prepared by Therefor Group and is provided in Attachment 8. The report has further reviewed the proposed temporary access for Lots 17,18 and 19 and has determined that this access arrangement is a suitable outcome from a bushfire perspective and can comply with performance outcomes of the bushfire overlay code.

In particular, bushfire modelling has found that the proposed access provides a safe and functional road access during both the interim and the ultimate stages of the development. Lot 17,18 and 19 will be accessed via a private road from Gardner Road with a temporary access easement. The road has been designed to cater for an articulated vehicle (AV) and therefore, the proposed road is wide enough to cater for fire fighting vehicles.

Furthermore, the bushfire report includes a temporary access risk assessment which outlined that the risk associated with the mobility and ingress/ egress is considered tolerable on the basis that it is temporal in nature and future access will be provided via the land to the south. Accordingly, the proposed access is considered to comply with the PO17 & PO18 of the Bushfire overlay code. Refer to Attachment 8 for further detail.

- b. Submit landowner consent from Energex for works within the existing Energex easement on Lot 102 SP226721;**

Applicant Response:

The proposed works are in accordance with the Energex Easement and therefore it is unnecessary to provide owners consent for the purpose of assessing this development application. Furthermore, Energex has separately issued an information request which raises three (3) matters which involves access to their easement. Accordingly, where required, consent will be resolved in accordance with the terms of the easement, between the landowner and Energex.

It is noted that as a referral agency, Energex will provide a referral agency response (advice) to Council for consideration.

- c. Include further information on the purpose of proposed lot 907 and how access can be achieved for this lot; and**

Applicant Response:

The proposal does not include Lot 907, instead this Lot (previously Lot 907) is part of Lot 904, which will be separated by the Waterway Lot (Lot 800). Ultimately, access will be provided to this lot via the proposed road as part of the development application at 381 Rochedale Road, Rochedale (A004685227). Refer to Figure 2 below.

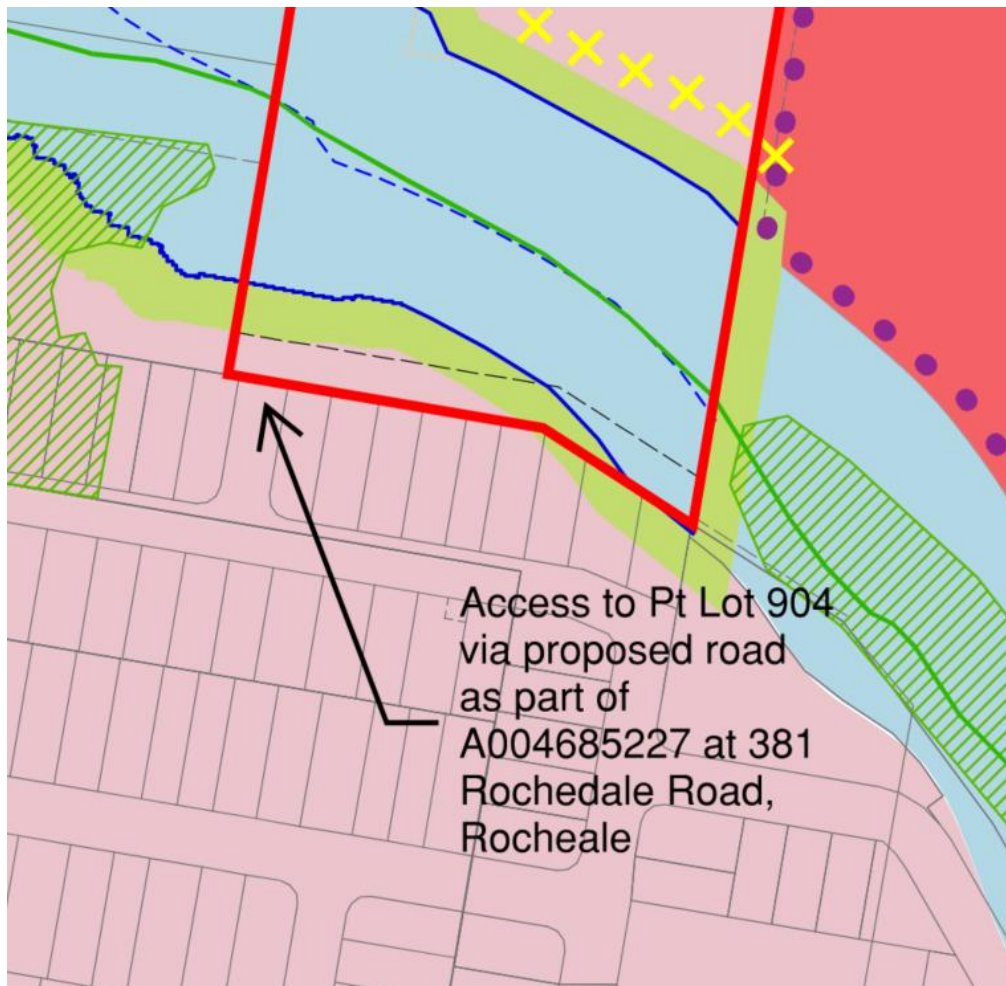


Figure 2 – ultimate access to Pt Lot 904 via development A004685227

d. Further information on access to the fringe on each part of lot 800.

Access to the proposed waterway fringe (Lot 800) will be provided via the new road reserve.

Access to the northern part of the waterway (within 184 Gardner Road, Rochedale) can be obtained via Council owned land at 180 Gardner Road, Rochedale.

Access to the southern part of the waterway (i.e. to the south of the residential area approved under A005747839) can be provided via a temporary access easement (as conditioned under A005747839) until the land to the west (202 Gardner Road, Rochedale) or the land to the east (323 Rochedale Road, Rochedale) is developed. It is noted that each of these parcels have active development applications and/or approvals of the subject land.

This is demonstrated in Figure 3 below.

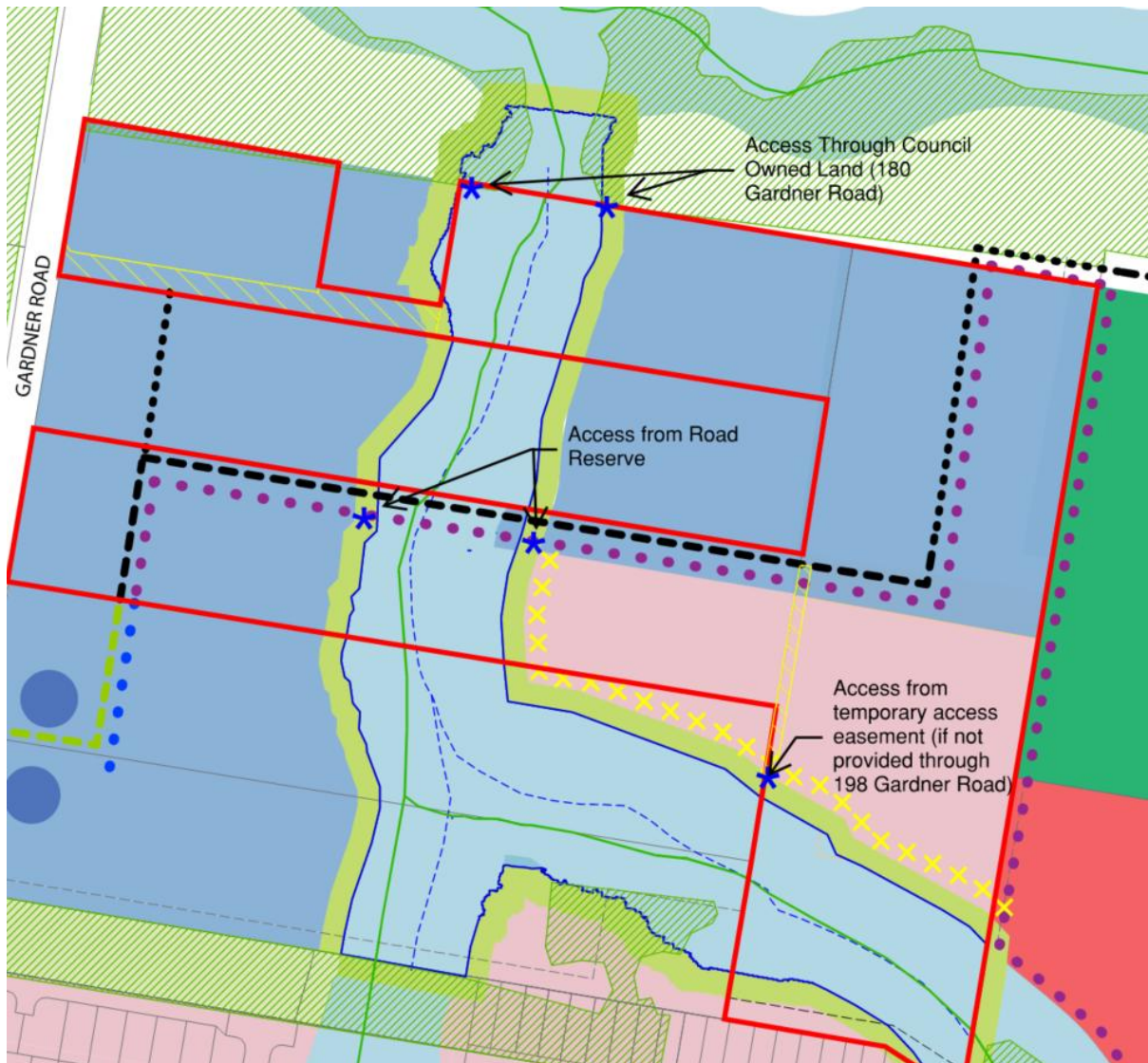


Figure 3: Access locations to Waterway Fringe (shown by blue star)

Applicant Response:

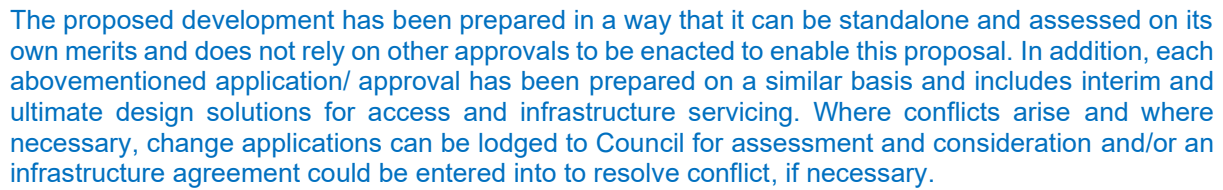
6. *Submit Structure plan to ensure a well-planned and contiguous development in accordance with AO9.1/109 and AO18.1/PO18 of the Subdivision code, Overall outcome 2h of the Emerging community zone code, and Structure Planning planning scheme policy, including the following information. The structure plan to include all relevant lots, and not limited to be 184, 190, 198, 202 and 210 Gardner Road and 56 Farley Road and any other relevant adjoining lots. Consideration should be given to the orderly development of the relevant land in relation to road network, drainage, servicing, trunk infrastructure, stormwater quality and quantity management, traffic generation, access and emergency egress, and any other relevant considerations.*

Applicant Response:

The ultimate Structure Plan has been prepared by Therefor Group and is provided in Attachment 10.

STAGING

7. *The proposal is reliant on an existing approval and several concurrent applications currently being assessed by Council including A006484551, A006738631, A006761597 and A005747839. Submit further information and an updated structure plan detailing how this application will be staged/sequenced in consideration of the concurrent applications in accordance with PO19 of the Subdivision code. The plans to clearly*



- 8. An interim access to Gardner Rd for lot 17 and an access easement over lot 17 in favour of proposed lots 18, 19 and 800, and existing lot 103 on SP226721 is proposed, with the interim access to Gardner Road to be extinguished once development of 190 Gardner Rd provides a minor road frontage to the site. If temporary access is still proposed and bushfire concerns are addressed, submit the following information to consider this request:**
 - a. Gardner Road is a major (suburban) road with a posted speed limit of 70km/h. Submit a turn warrant assessment for the proposed access to lots 17-19, as well as an assessment of the suitability of the access location in accordance with the TAPS PSP (including sight distance etc.);**
 - b. The provided SIDRA analysis of the interim access to Gardner Rd identifies that the right turn egress would become difficult in future year 2034 and recommends access be limited to left in / left out only (left turns remaining within capacity in future year 2038). Provide revised plans to demonstrate left in / left out operation of the interim access;**
 - c. Submit concept traffic functional layout plan to demonstrate safe temporary access from Gardner Road and proposed associated roadworks;**

A turn warrant assessment has been prepared by SLR Consulting for the proposed Lot 17-19 access which has determined that a Basic Left (BAL) turning treatment along Gardner Road is appropriate to provide access. It is noted that the Traffic Impact Assessment prepared and lodged as part of the common material supporting the development application, it identifies that this intersection is able to function as an all movement intersection up to 2034, whereby it would be reduced to a left in, left out,

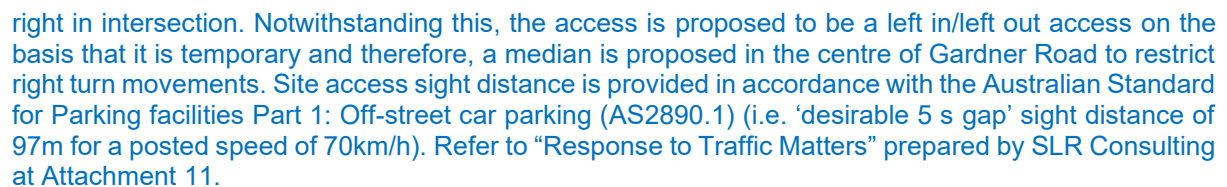
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Figure 6: Excerpt of Functional Layout Plan

- d. *Provide details on how and when the temporary access to Gardner Road will be closed and who will be responsible for the works associated with the closure of the temporary access; and*
- e. *Provide details on the interim and ultimate access arrangements for the proposed lots 17, 18 and 19. Also demonstrate how the proposal will secure the removal of the access improvements and services in future when the ultimate road network is secured. Note that any arrangement is to demonstrate the safe access for the development for all users; and*

Applicant Response:

The proposed site access from Gardner Road will be in place until such time as 190 Gardner Road (i.e. which does not form part of this application and is not controlled by the Applicant) is developed at a future stage by others. The proposed access to Gardner Road would only ever be removed in the event that suitable legal access (i.e. via either a public road or new easement) is provided to Easement A, and all lots reliant for access (i.e. including proposed Lots 17, 18 and 19 and Lot 103 on SP226721), are provided access via 190 Gardner Road. This would need to be facilitated by Council (in conjunction with future applicants), noting that the applicant for the subject Development application (DA) has no control over 190 Gardner Road.

In the ultimate scenario, access for Lots 17, 18 and 19 will be via the land to the south. It is noted that it will not be necessary to amend or change the access easements (i.e. which benefit/burden Lot 103 on SP226721 and proposed Lots 17, 18 and 19), which will continue to provide 'right of way' in accordance with the terms of the easement to the benefitted lots, albeit access would be achieved via the new road over 190 Gardner Road, rather than by direct access from Gardner Road.



- f. Submit further information to address how utilities will be maintained or modified when temporary access to Gardner Road is removed, including detailed information on how easements will either remain in place or modified. Submit a SAN (Service Action Notice) from Urban Utilities.**

Applicant Response:

The proposed servicing arrangement has been developed so that removal of the temporary Gardner Road access will not adversely affect the long-term servicing of Lots 17, 18 and 19. Accordingly, the following arrangements are proposed:

- The water main terminates at a water meter assembly located at the end of the private driveway.
- The sewer connection is provided from the rear of the lots and does not rely on the temporary access corridor.
- Future internal water reticulation and building drainage will be undertaken as private plumbing and drainage works under the relevant plumbing approval process.
- No water or sewer infrastructure is proposed through the portion of the temporary access that would be removed.
- The only stormwater infrastructure within this area is the local swale outlet and associated DN375 stormwater pipe. This drainage infrastructure can remain operational independently of the temporary road connection and can be incorporated into the ultimate arrangement.

Accordingly, removal of the temporary road access will not require relocation of the proposed water or sewer infrastructure. Refer to Attachment 9 for further information.

9. Demonstrate how the proposed District Road will achieve access to Farley Road.

Applicant Response:

The road connection between the proposed district collector and Farley Road will be facilitated in accordance with the approved design under Development Approval A006484551. The design will be undertaken as a part of detailed design and a subsequent operational works application.

10. Submit further information on the purpose of the truncation shown between lots 1 and 2. Clarify if the access to the eastern portion of Lot 2 on RP114765 is intended to be provided from the south as per the approved easement in favour of Council from the new road or if the access will be located where the truncation between lots 1 and 2 is currently shown.

Applicant Response:

Access to Lot 2 on RP114765 will be provided from the south as per the approved easement in favour of Council. A secondary access along the eastern boundary is not proposed. The truncation between the proposed Lots 1 and 2 has been shown as based on sight line distances, this is the most suitable/likely location for the future site access for proposed Lot 1.

11. The assumed phasing for the Gardner Road/Prebble Street intersection (four-way layout) would result in physical conflict between design vehicles operating on opposing movements. Submit amended phasing to reflect the phasing assumed in the development application at 198 & 202 Gardner Road (Council ref: A006738631) that is currently under assessment, including revised operational impact reporting.

Applicant Response:

Refer to the "Response to Traffic Matters" prepared by SLR Consulting at Attachment 11. Updated SIDRA analysis of the Gardner Road/Prebble Street/site access intersection has been undertaken using the signal phasing requested by Council, a summary of which is included at Attachment 11. It is noted that the adoption of the alternate signal phasing requested by Council makes no material difference to the previously reported assessment outcomes; the proposed four-way signalised intersection layout will continue to perform within typically adopted performance thresholds (i.e. DOS of 0.90 for a signalised intersection) for all assessment scenarios.



LOT ACCESS

- 12. Demonstrate ultimate access to each lot from the new district access road, taking into account safe sight distances and level differences between lot and ultimate road design levels in accordance with the Transport, Access, Parking and Servicing Code and Planning Scheme Policy needs to be addressed and demonstrated to ensure future access locations will comply with the planning scheme.**

Applicant Response:

Arcadis have prepared a sight distance plan which shows the ultimate access location to each lot from the new district access road (refer to Attachment 12). The plans demonstrate how sight distance can be provided for each proposed driveway crossover in accordance with AS2890.1 (i.e. 'desirable 5 s gap' sight distance of 69m for a posted speed of 50km/h) and also demonstrates the proposed vertical interface between the lots and the ultimate road alignment.

WATERWAY OVERLAY

- 13. The submitted documentation does not provide detailed information required to demonstrate compliance with PO4, PO5, PO7, PO8 and PO9 of the Biodiversity areas overlay code, Overall outcome 3(h), PO2, PO4, PO5 of the Rochedale community neighbourhood Plan, PO1, PO2 and PO6 of the Waterway corridors overlay code, and PO19 of the Subdivision code. The fringe waterway corridor is to be located within Lot 800 and to be dedicated to Council. The fringe is to provide a buffer to the core waterway corridor and provide for maintenance access.**

- a. Provide a revised ROL plan that clearly shows the proposed core waterway corridor a minimum 60 metres wide and fringe corridor width of a minimum 10-metre on either side of the core waterway corridor, all located within proposed Lot 800.**
- b. Where proposed private lots share a boundary with the waterway corridor the full fringe must be provided to allow for a Council maintenance access, and the fringe must be free of any batters or retaining walls for private lots. Confirm that vehicle access can be achieved via the fringe waterway corridor and provide updated engineering drawings where required. Submit section plans showing the interface between all lots and the waterway corridor.**

Note: In terms of riparian waterway widths, please refer to QLD fisheries (Fish Habitat Buffer Zones, 2000) and other Australian sources that strongly correlate increased waterway widths with larger waterway health benefits. Waterway width should also have regard to stream order as a buffer width cannot be selected without reference to its location in the catchment and size of downslope connecting creek.

Applicant Response:

It is noted that this information request item is identical to an information request item within development application A006761597 which is currently under assessment by Council. As a part of that information request response, an information request letter was prepared by BAAM Ecological Consultants which responded to all items. A separate written response letter has been prepared by BAAM and is provided in Attachment 13.

The proposed corridor provides a minimum width of 80m in the northern part of the waterway, comprising a 60m core corridor and 10m wide fringe in accordance with the planning scheme requirements. In the east-west tributary the waterway adopts a minimum width of 100m, comprising an 80m core waterway (40m either side of the centreline) and a 10m fringe on each side. This **exceeds** the minimum 60m core and 10m fringe requirement identified in Council's information request and the Rochedale Urban Community Neighbourhood Plan and results in an **increase** to total waterway area (in comparison to the current mapping).

Vehicle maintenance access to the waterway corridor is provided via the proposed waterway-fringe maintenance access/bikeway alignment. The proposed alignment provides a continuous maintenance route through the relevant portion of Lot 800 and connects to the proposed road network. A revised ROL plan and updated engineering drawings confirming vehicle/maintenance access via the fringe and bikepath are provided in Attachment 1 and 9 respectively.



The full waterway fringe adjacent to the proposed private lots is free of batters and retaining walls associated with the private lots, allowing for Council maintenance access in accordance with the intent of the Waterway Corridors Overlay Code. Minor earthworks may be required within the waterway fringe to facilitate the future construction of the proposed public bikeway/maintenance access alignment. Any such earthworks would be undertaken solely to accommodate the public infrastructure and are not proposed for, or intended to benefit, the adjoining private lots. Detailed design earthworks plans will be submitted as a part of a subsequent operational works application.

Furthermore, a Rehabilitation Plan has been prepared for the site which addresses future rehabilitation of the waterway corridor, and is provided in Attachment 14. Fish passage and culvert design is proposed to be addressed as a part of detailed design and a subsequent operational works application, in accordance with the Accepted Development Requirements for Raising Waterway Barrier Works. A response to each of the PO's and overall outcomes outlined in this item has been provided in a separate cover (See Attachment 18).

14. The core waterway width is highly relevant to planned overall waterway health, water quality, fauna movement and biodiversity. The proposed mapped LGIP (Local Government Infrastructure Plan) waterway values are not determined as per existing waterway conditions (as assessed in the SLR waterway condition report), but post rehabilitation of the waterways corridor as part of LGIP requirements, as the waterway land dedication and works (rehabilitation) are part of LGIP item ROC-LA-002. Also, the proposal is to ensure that the varying of the trunk waterway corridor and overlays does not compromise the values of the ultimate LGIP waterway corridor on adjoining land parcels. Submit amended plans and documentation on how the proposed waterway will meet PO5, PO6, PO8 of the Stormwater code and the trunk stormwater requirements in the LGIP.

Applicant Response:

An amended Rehabilitation Plan has been prepared by BAAM and is provided in Attachment 14. The proposed waterway corridor realignment aligns more closely with the existing overland flow path than the currently mapped Waterway Corridor Overlay, protects longitudinal and lateral hydrological connectivity, and contains the primary conveyance characteristics (flood extents, depths, velocities and shear stress) within the proposed corridor extents up to and including the 1% AEP event. The realignment results in approximately 72 m² of additional waterway corridor area, providing an improved water quality outcome. The corridor remains compatible with the LGIP trunk stormwater requirements (item ROC-LA-002) and the subsequent rehabilitation outcomes envisaged on adjoining land parcels. Refer to Attachment 14 for further details.

STORMWATER MANAGEMENT

15. Submit amended Stormwater Management Plan to address the following issues:

- a. Show how proposed lots will drain (minor and major flows) to a lawful point of discharge including details of any proposed earthworks (particularly lots 17 to 19 and Lot 2) in accordance with Infrastructure Design planning scheme policy.**

Applicant Response:

Refer to "Engineering Response" prepared by Arcadis and provided at Attachment 9 which provides a detailed response to this item. It is not necessary to submit a revised Stormwater Management Plan as the proposed stormwater management plan appropriate drains the site to a lawful point of discharge. In particular:

The proposed drainage strategy provides for stormwater from the proposed lots and relevant external catchments to be conveyed through the subject site to the central waterway corridor, which forms the lawful point of discharge.

A series of drainage swales has been provided wholly within the subject site. These swales have been sized to convey the relevant contributing catchment flows toward the waterway corridor. The proposed swale locations, contributing flow paths and discharge points are shown on the Amended Engineering Plans provided in Attachment 9.

No new cut-off drain or drainage infrastructure or associated earthworks are proposed within the adjoining property. External flows will be maintained along the existing boundary flow path and collected downstream by the proposed swales and drainage infrastructure within the subject site.



This approach is consistent with the intent of QUDM, on the following basis:

- Sections 7.1 and 7.2.3 support retaining major overland flows generally along their natural flow paths where this can be achieved safely.
- Sections 3.9 and 3.9.1 establish that the lawful-discharge assessment should consider whether the development materially changes the direction, concentration, depth, velocity or downstream impacts of runoff.
- Section 7.13.4 recognises that cut-off drains or bunds within private land may be unreliable unless appropriately protected and does not establish a cut-off swale as a default requirement.
- Section 7.13.6 recognises that overland flow through or along allotment boundaries may be acceptable where major flows are safely managed.

Stormwater from lots 17-19 and associated access MC02 will discharge into an inlet pit and DN375 pipe and ultimately into proposed swale A2 located within the site boundary. A revised stormwater management plan is proposed to be submitted as a part of detailed design and a subsequent operational works application.

b. Indicate on plans that proposed lots > 2500sqm will be required to provide their own water quality treatment, to ensure future applications triggers water quality assessment.

Applicant Response:

Future development of lots greater than 2,500 m² will be required to provide appropriate on-lot stormwater-quality treatment as part of the relevant future development and detailed design applications. This will be required as part of any future development application on those lots.

c. Easements for stormwater drainage are to be shown for lots 17 to 19.

Applicant Response:

The proposed stormwater drainage infrastructure servicing proposed Lots 17-19 will be secured by an easement, subject to detailed design and retaining wall design.

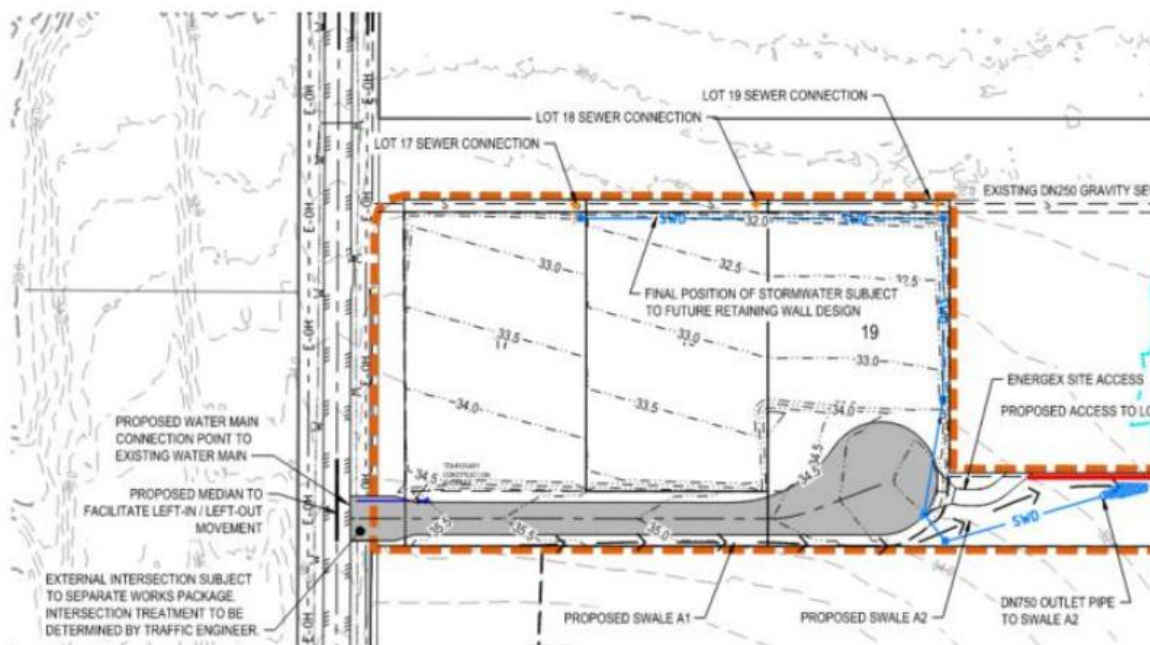


Figure 7: MC02 Stormwater Drainage Infrastructure

16. Provide details for creek crossing structure under the new road based on revised flow analysis. The design of the culvert needs to balance flood management, ecological requirements, waterway health, asset maintenance/replacement and construction costs. The following items are to be provided:



- a. *The main channel culverts are to be constructed using box culverts with link slabs between. This will allow for riprap natural base where link slabs are located and reduce costs;*
- b. *The culverts need to allow for fauna movement (both terrestrial and aquatic). This will require a wet/dry cell arrangement;*
- c. *The culverts need to allow for fauna movement (both terrestrial and aquatic). The use of 1500mm high culverts needs to be determined to be suitable by ecology. The culvert design must provide for dry and wet culvert cells; and*
- d. *A culvert general arrangement plan with concept sections needs to be provided clearly showing that the proposed crossing can fit within the existing creek channel without significant widening and unsafe batters needing to be created.*

Applicant Response:

The proposed creek crossing structure has been designed to balance several matters including flood management, fauna movement, fish passage, waterway health, District Road design, constructability and asset maintenance/ replacement.

The proposed design includes box culvert with link-slab arrangements, as follows:

- 2 x 3600W x 2100H 'wet culverts' along the waterway centreline. These culverts are intended to provide fish passage and have been designed in consideration with the Water Barrier Works Accepted Development Requirements.
- 4 x 3600W x 1500H culverts (dry) providing flood water conveyance capacity in the waterway and fauna movement opportunities. These culverts provide dedicated fauna movement opportunities on each side of the waterway.
- 2 x 3600W x 1725H link culverts (dry) providing fauna movement including fauna movement ledges and poles, and flood water conveyance capacity in the waterway.

Refer to Figure 8 below and the "Engineering Response" prepared by Arcadis in Attachment 9.

Road Design – The culvert crossing design ensures the District Road maintains immunity (+ freeboard) in all events up to and including the 1% AEP event whilst maintaining appropriate coverage to the culverts and gradient (long section) for the road.

Flooding – The culvert crossing design has been designed, tested and determined in accordance with Flood Impact Assessment to ensure that the proposed culvert design is able to convey flood waters without causing a material adverse impacts off site in all design events up to the 1% AEP event. This is demonstrated in the Flood Impact Assessment prepared by ADG Engineers in Attachment 15.

Fauna Movement – BAAM Ecology have prepared a Fauna Movement Plan which provided at Attachment 17 and considers the design of the culvert crossing for Fauna Movement. BAAM Ecology assessment is that the culvert sizing for dry culverts are appropriate for koala's, marsupials and macropods, in which koala and wallabies are to be the most likely species to utilise the crossing in the project area.

BAAM Ecology have prepared a design for koala & macropod movement through the 2 x 3600W x 1725H link culverts. These culverts include timber poles and timber ledges which run through the culvert with poles connecting the timber ledges to the ground on either side of the culvert. Refer to Figure 9 and 10 below.

The Flood Impact Assessment has assumed a 50% blockage factor for modelling purposes, demonstrating that this fauna movement infrastructure will have no effect on flood outcomes.

Fish Passage – SLR Consulting (Dr Ben Cook) has provided advice to Arcadis in preparing the culvert design. This advice has been to include 2 x larger 3600W x 2100H culverts in the centre of the waterway, to achieve tie in with the invert of the waterway. These culverts will include a rock / baffle finish to enable and encourage fish movement. The design of the culverts have been considered in line with the Waterway Barrier Works Accepted Development Requirements.

Constructability & maintenance– the culvert crossing has been designed to minimise earthworks within the waterway and to contain works within the proposed road corridor – ensure future maintenance access to the culverts.



The culvert design has been highly considered and a result of significant design and refinement in order to balance a number of functions and operations. It is considered that the culvert crossing design has been optimally designed to achieve all of the above functions, whilst minimising impacts.

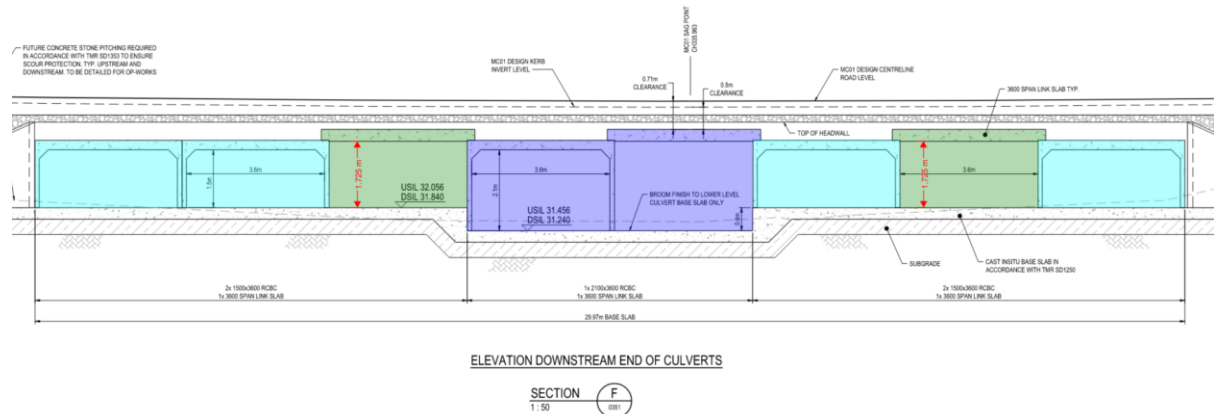


Figure 8: Proposed Culvert Design. Cyan culverts = 3600W x 1500H Dry Culvert, Green culverts = 3600W x 1725H dedicated Fauna Movement Culvert, Blue culverts = Fish Passage Culvert

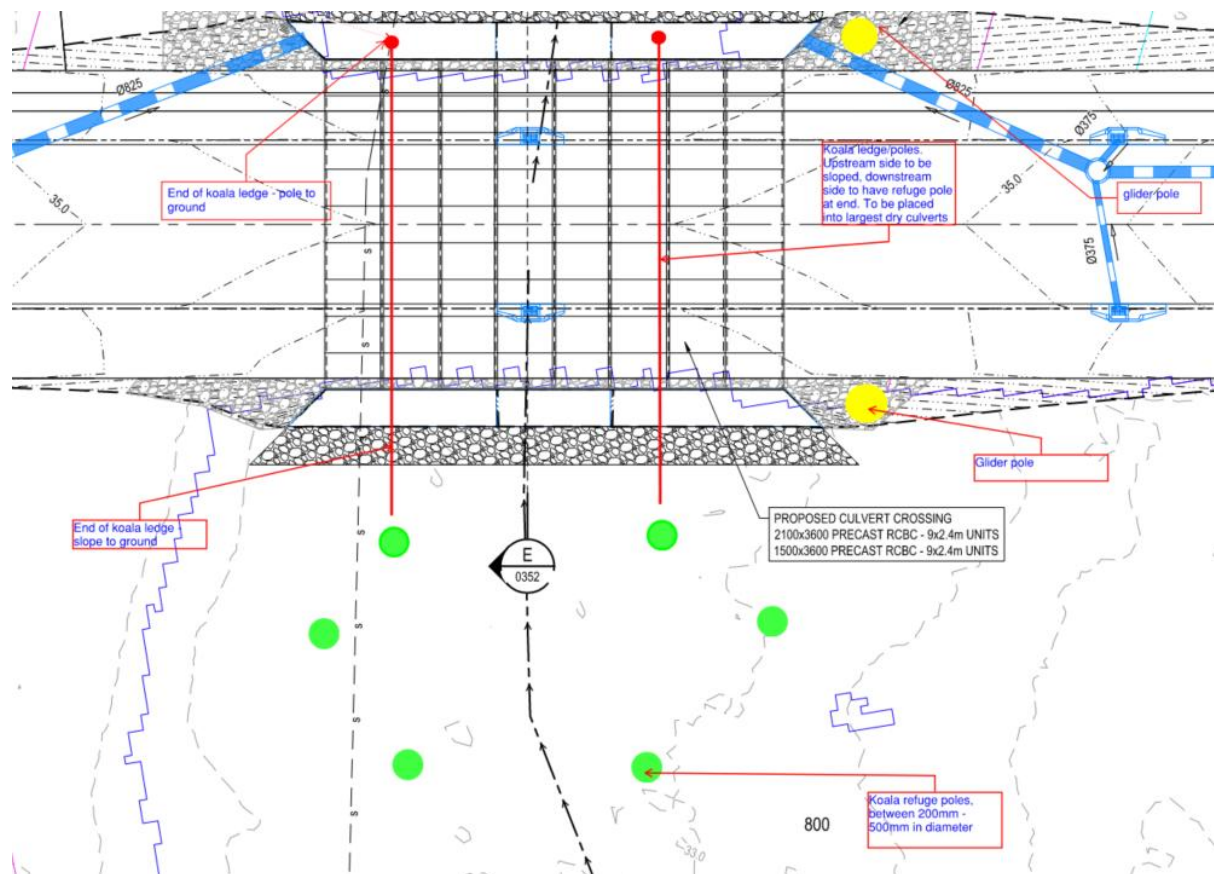


Figure 9: Proposed Culvert Design – Fauna Movement & refuge plan – note: koala ledges/poles proposed through 3600W x 1725H culverts

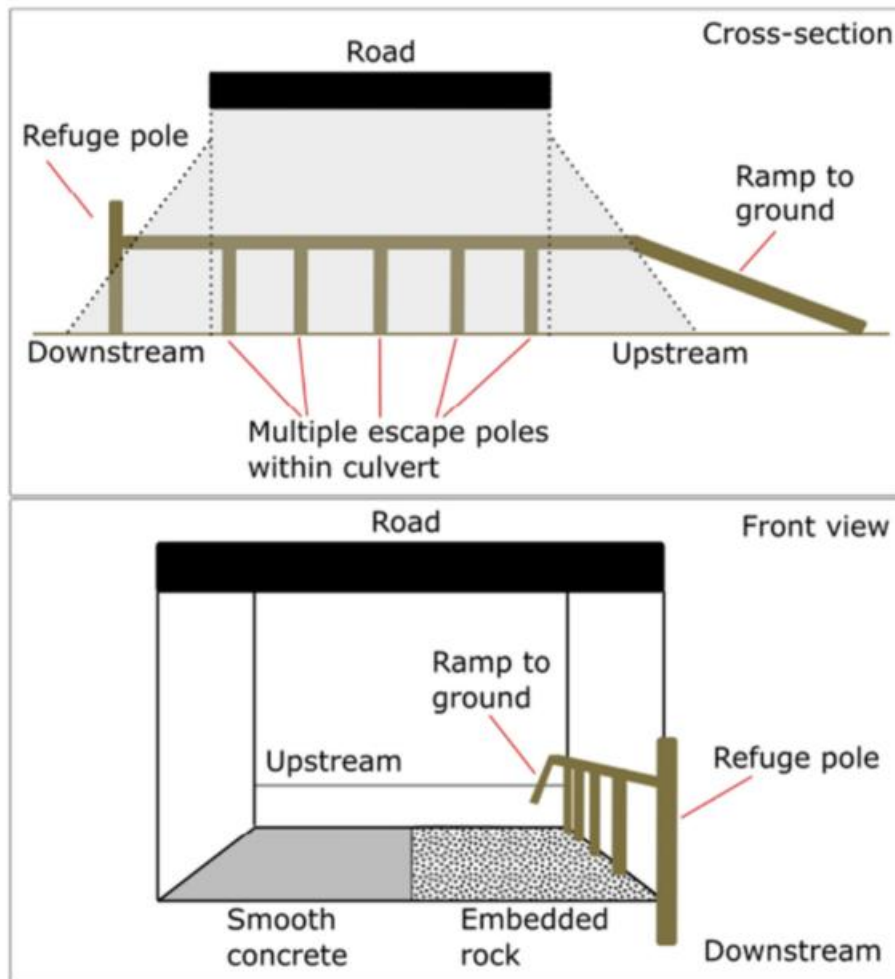


Figure 10: Proposed Culvert Design – koala ledges/poles proposed through 3600W x 1725H culverts

- 17. The proposed Bulk earthworks plans, and cross sections does not correlate with the proposed stormwater concept plan in that the cut off drains are not shown in the section drawings. Submit engineering and ROL plans that are inconsistent with the proposed Stormwater management layout**

Applicant Response:

The stormwater and earthworks arrangements have been further coordinated through the detailed design process and as a result, no cut-off drain or earthworks are proposed on adjoining property. Boundary flows will remain along the existing boundary flow path and will be collected downstream within the subject site before being conveyed to the waterway corridor.

The detailed design sections identify the relevant on-site drainage features and demonstrate their relationship to the proposed bulk earthworks, batters and retaining structures. Refer to “Engineering Response” prepared by Arcadis at Attachment 9 for further detail.

FLOOD OVERLAY

- 18. Provide supporting flood study demonstrating flooding is contained within the waterway, culverts convey 1% AEP flows, and lots have flood immunity. Flood study to allow for AR&R climate change and fully upslope developed conditions in the analysis and input flows from the site into the creek at the culvert and downslope boundary of the site based on proposed pipe discharge locations. The following must be also addressed;**

- a. **Provide the catchment hydrology methodology and list the peak flows assumed in the model at each boundary inflow location. As noted in the flood study, all flows are to allow for a fully developed upslope catchment with no stormwater detention;**



- b. The 2016 Australian Rainfall & Runoff (AR&R) data hub information is now outdated. Obtain the LIMB 2020 (or newer where available) rainfall data from City Projects office;**
- c. Update culverts to required sizing/arrangement for fauna movement and design the culverts for a maximum 30% blockage;**
- d. Provide flood level maps showing contours for 1% AEP flood and confirm all lots are >300mm above the 1% AEP flood level;**
- e. Provide culvert outlet velocity as modelled and ensure <2.5m/s even where riprap is provided; and**
- f. Model AR&R climate change RCP4.5 (or equivalent factoring of flows) as a separate model scenario and ensure the waterway contains this flooding up to 0.2%AEP event and ensure lots are at least 300mm above this level.**

Applicant Response:

An updated "Flood Response" which encloses the Flood Impact Assessment and has been prepared by ADG Consulting and is provided at Attachment 15. The Flood Impact Assessment has been prepared to account for updated rainfall data associated with the LIMB2020 rainfall data (as provided by city projects).

To summarise the "Flood response" at Attachment 15:

General: ADG have prepared a revised Flood Impact Assessment which includes updated LIMB2020 rainfall data from City Projects office. The Flood Impact Assessment allows for climate change impacts and assumes a fully developed upstream catchment with input flow from the developed site.

In response to each other item:

- a. The catchment hydrology methodology has been provided within the Flood Impact Assessment (section 4). The Flood Impact Assessment allows for climate change impacts (climate change scenario SSP2-4.5 (2100)) and assumes a fully developed upstream catchment with input flow from the developed site.
- b. ADG have prepared a revised Flood Impact Assessment which includes updated LIMB2020 rainfall data from City Projects office. Rainfall intensities have been increased to reflect climate change scenario SSP2-4.5 (2100).
- c. The Flood Impact Assessment has been prepared based on the culvert crossing design per the Arcadis Engineering drawing Culvert Crossing Section and Elevation RNI-AAP-DA-01-DRG-CI0352 (issue 2). The Flood Impact has assumed a conservative 50% blockage factor to account for the fauna movement & fish passage infrastructure through the culverts.
- d. The Flood Impact Assessment includes flood level maps showing the flood levels up to the 1% AEP event in the post development scenario. All proposed lots are >300mm above the 1% AEP flood level.
- e. Culvert outlet velocities are less than 2.5m/s.
- f. All lots are >300mm above the 0.2% AEP flood level.

The 1% and 0.2% flood level is not contained within the waterway at the northern end of waterway due to undefined bank and minimum grades in the northern section of the waterway. This is not a result of the development, whereby the extent of flooding in the 1% and 0.2% AEP is the same (no change) under the pre-development scenario. The extent of flooding is a product of updated LIMB2020 data and results in flood water spreading out over the land at 103 SP226721 and Council owned land before the waterway junction. The depth of flood water is less than 0.5m and slow moving (<1m/s). It is not considered necessary to change the waterway alignment through the northern part of the waterway.

Figure 11 and 12 demonstrate the 1% and 0.2% flood line in relation to the proposed development extent, demonstrating that each lot achieves flood immunity in the 1% and 0.2% events.

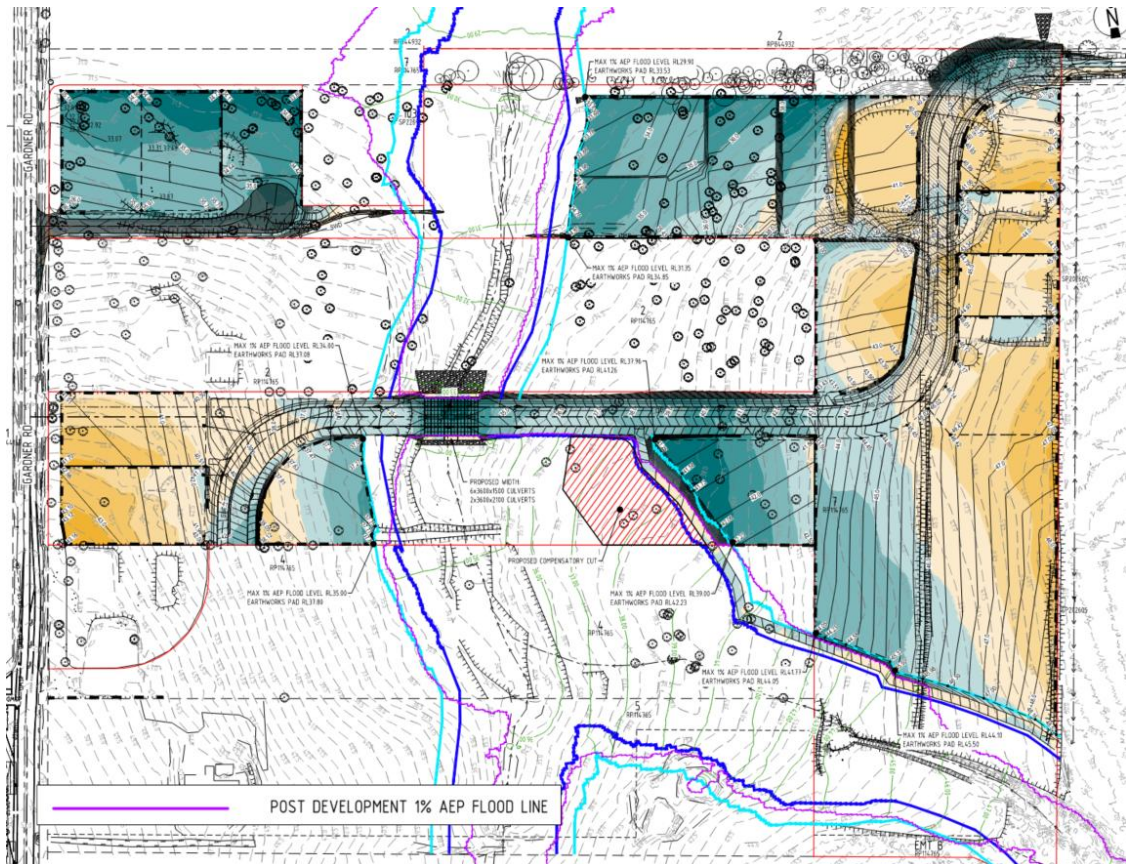


Figure 11: 1% AEP line in relation to the waterway corridor and works

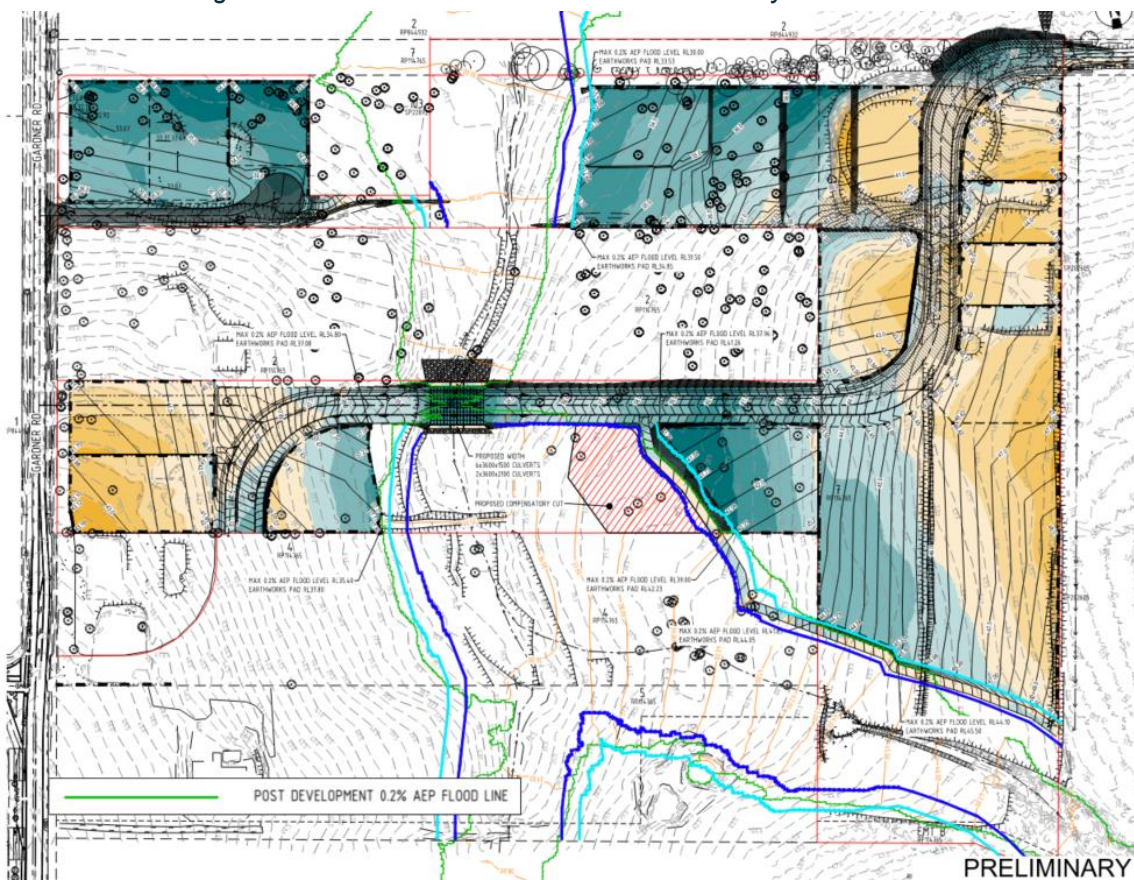


Figure 12: 0.2% AEP line in relation to the waterway corridor and works



EARTHWORKS

- 19. The proposed concept earthworks plans (Bulk Earthworks Layout Plan) show cut off drains in the neighbouring property. Submit owner's consent to demonstrate the development does not impact flooding or drainage characteristics of adjoining properties or alternatively amend plans to show cut off drains within the application site.**

Applicant Response:

The proposed civil design has been amended and does not include cut-off drains, swales or earthworks within neighbouring property. External flows are maintained along the existing boundary flow path in accordance with the applicable QUDM provisions. These flows are collected downstream within the subject site by the proposed drainage system and conveyed to the waterway corridor.

As no drainage works are proposed within neighbouring land, adjoining-owner consent is not required for the proposed civil drainage arrangement.

- 20. Submit further information to clarify if the proposed earthworks shown on the concept plans (Bulk Earthworks Layout Plan, Bulk Earthworks Site Cross Sections plan) match works proposed in associated applications that are approved or currently under assessment by Council including A006761597, A006484551, A006738631 and A005747839.**

Applicant Response:

Amended Engineering Plans have been prepared by Arcadis and are provided in Attachment 9. The bulk earthworks plans are aligned with A006484551 (Northern Leg), A006738631 (Southern Leg) and A005747839 (Central Leg) – assuming the ultimate development of all of the land. The proposed earthworks drawings also align with A006761597 (Waterway Application) and is able to tie into the design of that application.

- 21. Demonstrate on amended plans to show batters set back sufficiently to ensure there is no ponding or nuisance stormwater run-off on neighbouring properties.**

Applicant Response:

The proposed batters and retaining structures have been configured to maintain the existing boundary drainage behaviour and avoid ponding or nuisance runoff onto adjoining property. Existing and external flows are collected through the proposed on-site drainage system. This includes field inlets and downstream swales where required, with flows conveyed to the central waterway corridor.

- 22. Submit additional information to demonstrate that the proposed earthworks do not conflict with ecological values and will not impact on any vegetation to be retained, or proposed rehabilitation works, as requested in the following section.**

Applicant Response:

The amended Vegetation Management Plan & Rehabilitation Plan has been prepared in accordance with the amended engineering plans. Refer to Attachment 14 – Vegetation Management Plan & Rehabilitation Plan prepared by BAAM Ecology which provides details on ecological values and outlines vegetation to be retained and proposed rehabilitation works.

The waterway corridor is proposed to be rehabilitated to provide the pre-clearance RE's to improve ecological condition and habitat connectivity. In particular, it is proposed to undertake riparian revegetation planting using locally appropriate native species consistent with the technical description of the RE and to establish full strata plantings to establish long-term canopy, mid-storey and ground cover structure.

ECOLOGICAL VALUES

- 23. The submitted documentation, including the Ecological Assessment Report (EAR), does not provide detailed information required to demonstrate compliance with PO4/PO5/PO7/PO8 and PO9 of the Biodiversity areas overlay code, PO1, PO2 and PO6 of the Waterway corridors overlay code, OO3(h)/PO2/PO4/PO5 of the RUCNP and PO19 of the Subdivision code.**

- a. The submitted EAR does not assess the full extent of proposed development footprint and impacts to ecological values of the entire site (e.g. the north-eastern portion of the site is**



located within an area that has an existing dam). The EAR also provides for a different lot layout than what is shown on proposed 'Plan of Reconfiguration' (drawing no. 23-0329P-13 Sheet No. 1 of 1 Rev D), BCC received 14/01/2026 (e.g. Lot 800, Lot 13, Lot 1).

Applicant Response:

An ecological information request response and an amended Vegetation Management Plan & Rehabilitation Plan has been prepared by BAAM Ecological Consultants and is provided in Attachment 13 and 14 (respectively).

A small farm dam is located in the north-eastern part of the site and was used to support cropping horticultural activities on adjacent land. It is noted that the removal of the dam has been in principle agreed by Council as a part of development approval AO6484551 (i.e. the Northern Leg DA). A preliminary Dewatering Management Plan has been prepared and provided in Attachment 16.

b. Provide an amended EAR that:

- i. Clearly indicates the extent of the proposed development footprint including; development areas, roads, building envelopes, service alignments, stormwater infrastructure and access for construction works, to determine the area of impact. Amendments to site layout are to be incorporated to reduce area of impact. Ensure all plans are consistent.**
 - ii. Provide a preliminary Dewatering Management Plan prepared by an appropriately qualified ecologist for dewatering and filling to facilitate construction of the new road/lots in the location of the existing dam.**
- c. The EAR identifies that a separate development application has been lodged to remap the waterway corridor (A006761597). This information was not submitted with this application, which is seeking changes to developable area within the waterway corridors and biodiversity areas mapping. Provide reporting for the proposed reduction of the waterway corridor extent for Lot 800.**

Applicant Response:

It is not necessary to prepare a revised EAR as it records environmental values across the site and considers impacts of the development based on the ultimate development of the site. Notwithstanding a revised Vegetation Management Plan has been prepared by BAAM Ecology which clearly indicates the extent of the proposed development footprint. Refer to Vegetation Management Plan & Rehabilitation Management Plan prepared by BAAM Ecology at Attachment 14.

BAAM Ecology have prepared a preliminary Dewatering Management Plan for the removal of the existing farm dam on the site.

- d. The fringe waterway corridor is to be located within Lot 800 to be dedicated to Council. The fringe is to provide a buffer to the core waterway corridor and provide for maintenance access.**
- i. Provide a revised ROL plan that clearly shows the proposed core waterway corridor and provides for the 10-metre fringe waterway corridor (either side of the core waterway corridor) all located within proposed Lot 800.**
 - ii. Batters within the fringe waterway must ensure maintenance access can be achieved. Confirm that vehicle access to the core waterway can be achieved via the fringe waterway corridor and provide updated engineering drawings where required.**

Applicant Response:

The fringe waterway corridor is located entirely within Lot 800 and will be dedicated to Council in the future. Lot 800 covers the proposed core waterway corridor and the 10m wide fringe waterway. Refer to Attachment 1 for the amended Reconfiguration of a Lot Plan.

Maintenance access will be provided to the fringe waterway via the proposed new road. Refer to the Engineering Drawings in Attachment 9 for further detail.

- e. Demonstrate how access to Lot 907 will be achieved ensuring minimal impacts to the waterway corridor. Note: crossing of the waterway corridor is generally not supported and**



alternative access is to be investigated. Provide updated engineering drawings where required.

Applicant Response:

The proposal does not include Lot 907, instead this Lot (previously Lot 907) is part of Lot 904, which will be separated by the Waterway Lot (Lot 800). Ultimately, access will be provided to this lot via the proposed road as part of the development application at 381 Rochedale Road, Rochedale (A004685227). Refer to Figure 2 above.

- f. The submitted 'Tree Plot' does not provide for the development impacts e.g. stormwater outlet, earthworks, dam infill, services, roads, and installation of works required for the fringe waterway corridor etc. The plan also did not identify tree numbers and did not provide a corresponding Tree Survey Data table. Provide a Vegetation Retention Plan in accordance with the Biodiversity Planning Scheme Policy including:**
- i. All trees 100 mm DBH or greater within the site and within 6m of site boundaries.**
 - ii. The proposed development plan (as an overlay) including:**
 - iii. clearly defining proposed lot boundaries and corresponding lot numbers,**
 - iv. All services/infrastructure/stormwater outlets and the full extent of all earthworks (cut/fill) required during construction of the development as identified within the submitted Engineering Services Report and Stormwater Management Plan prepared by Arcadis (BCC received 2/2/26) and shown on Bulk Earthworks Layout Plan (drawing no. RNI-AAP-DA-01-DRG-CI-0101 Issue 0); Roadworks and Chainges Layout Plan (RNI-AAP-DA-01-DRG-CI-0201 Issue 01), BCC received 2/2/26; Combined Utilities Layout Plan (RNI-AAP-DA-01-DRG-CI-0501 Issue 01).**
 - v. A description of vegetation communities and species compositions for ground, shrub and subcanopy layers. Any species or vegetation communities of State / National significance to be clearly identified.**
 - vi. A clear indication of which trees are to be retained and which trees are to be removed, including the following information:**
 - Scientific name;**
 - Height;**
 - Diameter of tree trunk at breast height (DBH);**
 - Crown diameter;**
 - Habitat features including hollows and scratch marks, nests etc.**
 - Tree Protection Zones (TPZs) (in accordance with AS4970); and**
 - General health assessment.**
 - Associated tree numbers clearly shown on the plan.**

Applicant Response:

Please find within Attachment 13 an updated tree plot and Vegetation Management Plan & Retention Plan prepared by BAAM Ecology. The retention plan clearly outlines all trees 100mm DBH or greater within the site and also shows the proposed earthworks design.

- g. If works encroach into the TPZs of any trees identified to be retained, a report from a qualified arborist (AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.**

Applicant Response:

Where trees are impacted by earthworks they have been identified for removal. No trees proposed to be retained will have works encroaching on their TPZs and therefore, a report from a qualified arborist is not necessary. Where there are trees outside of the subject property which are to be retained (for example in 180 Gardner Road, Rochedale), the applicant is willing to accept a condition requiring an arborist report on the long term health of trees. Refer to the Vegetation Management Plan & Rehabilitation Plan prepared by BAAM Ecology at Attachment 13 for further information.

- h. Removal of native vegetation within the mapped Biodiversity areas overlay – High Ecological Significance Strategic subcategory (HESS) will require environmental offsets in accordance with PO9 of the Biodiversity areas overlay code, the Environmental Offsets Act 2014 and the Offsets Planning Scheme Policy. Provide an Offset Impact Area plan that confirms total area to be offset for the removal of native**



vegetation within the mapped Biodiversity areas overlay - High Ecological Significance Strategic sub-category area.

Applicant Response:

An Offset Impact Area plan has been prepared by BAAM Ecology and is provided in Attachment 13. The plan confirms there will be removal of some isolated patches of native vegetation within the (currently mapped) HESS area. However, it is considered that the proposed rehabilitation will result in a significant increase to the HESS habitat values on the site and will provide a superior outcome greater than the requirements of the planning scheme policy. Accordingly, no offset requirements will be required under future operational works.

- i. Fauna movement solutions proposed include shelves/ledges within existing culverts, however no further information has been provided. Provide detail (specifications and locations) of fauna movement solutions to enable safe movement of fauna throughout the site and within the ecological corridor and are cognisant of engineering requirements (e.g. box culverts). Note: Development Approval A005747839 which requires minimum 3600mm wide and 1800mm high box culvert for fauna movement and specifications per DTMR Fauna Sensitive Transport Infrastructure Delivery manual. Detailed engineering plans must also be provided.*

Applicant Response:

Refer to response in relation to it 16 above.

BAAM Ecology have prepared a Fauna Movement Plan in relation to the specific design of the culvert crossing. Refer to Fauna Movement Plan prepared by BAAM Ecology at Attachment 17.

- j. The Concept Rehabilitation Plan states the planting strategy is introduce scattered plantings of water-tolerant native tree species spaced at 6-10m intervals. The waterway corridor must be fully rehabilitated with all strata. Selective canopy tree species only is not supported. Maintenance access is to be provided via the fringe waterway corridor. Provide a revised Concept Rehabilitation Plan for the rehabilitation of the core waterway corridor:*
 - i. Inclusive of full strata plantings to the pre-clearance Regional Ecosystem at 1/10m² for canopy species, 1/5m² for shrub species and minimum 1/1m² for groundcover species.*
 - ii. Proposed location and description of wildlife movement solutions (culverts, glider poles, koala refuge poles, fencing), lockrail/bollards, maintenance access.*
 - iii. Maintenance access must be located within the fringe waterway corridor. Detailed engineering plans must also be provided.*

Applicant Response:

Please find within Attachment 14 an updated Rehabilitation Plan prepared by BAAM Ecology which reflects a full strata planting and wildlife movement solutions for the waterway core corridor. This has been prepared in consultation with flooding engineer and waterway ecologist and reflects the mannings "roughness" co-efficient (0.15) applied to the waterway and the desired waterway outcomes (respectively).

Furthermore, the revised rehabilitation plan has identified locations for the wildlife movement solutions on the site, including culverts, glider poles, koala refuge poles, fencing, etc.

Please also read this response and the Rehabilitation Plan in conjunction with the detailed BAAM Ecology response to this information request item in Attachment 13.

BUSHFIRE

- 24. The submitted Bushfire Hazard Assessment (BHA) does not provide detailed information required to demonstrate compliance with PO1/PO17/PO18 of the Bushfire overlay code for the proposed subdivision and variation request.**



- a. ***The submitted Bushfire Hazard Assessment (BHA) report provides a Lot layout and setbacks from hazardous vegetation different to the lot layout shown on proposed 'Plan of Reconfiguration' (drawing no. 23-0329P-13 Sheet No. 1 of 1 Rev D), BCC received 14/01/2026 (e.g. Lot 800, Lot 13, Lot 1). Provide a revised Bushfire Hazard Assessment and Bushfire Management Plan based on the current proposed layout and identifying all lots with their intended zones/uses.***
- b. ***The submitted BHA does not address the proposed easement access from Gardner Road for Lot 17, Lot 18 and Lot 19. Direct road access and egress for new lots to public roads are to be provided, rather than creation of easements and does not include cul-de-sacs/dead-end roads (where dead-end roads are unavoidable maximum 60m long) and provides for an alternative emergency evacuation and egress route away from the most likely source of bushfire risk. Demonstrate compliance with AO17 and AO18.2 of the Bushfire overlay code for Lot 17- Lot 19 with direct road access and egress into public roads and alternative access/egress to comply with matters raised in this information request.***
- c. ***The submitted BHA has provided a bushfire hazard assessment based on a reduction of the Waterway corridor width and ultimate proposed rehabilitation outcome (PO1). The reduction has not been proposed as part of this separate development application. Provide revised bushfire hazard assessment either for full rehabilitation of the current mapped Biodiversity areas/Waterway corridor width or provide ecological reporting (as noted above) for any justification in reduction of the waterway corridor.***

Note: a revised bushfire hazard assessment may still be required pending the waterway corridor width.

Applicant Response:

An updated Bushfire Hazard Assessment (BHA) report and Bushfire Management Plan have been prepared by Therefor Group and are provided in Appendix 8. The amended report has been updated to align with the most recent layout and addresses the proposed access for Lots 17-19. In addition, the bushfire hazard assessment has been prepared in accordance with the proposed Rehabilitation Plan provided in Attachment 14 and as such, the proposed bushfire hazard has considered the ultimate rehabilitation outcome on the site in the assessment.

The proposed Lot 17-19 access has been assessed from a bushfire perspective, and it has been demonstrated that compliance can be achieved with the performance outcomes of the Bushfire Overlay Code. Proposed Lots 17-19 are to be accessed via MC02 which is a two-way vehicle movement road with a cul-de-sac/ turnaround arrangement suitable for emergency service access, evacuation and firefighting appliance maneuvering.

Radiant heat modelling has been undertaken to identify potential BAL exposure across the proposed development layout. The assessment accounts for the different rehabilitation vegetation communities, effective slopes and available fire-run geometry affecting each development interface. The distance required to achieve a radiant heat exposure of 29 kW/m² or less ranges from 11.1 m to 12.2 m from HA1 vegetation and is 15.7 m from HA2 adjoining proposed Lot 905.

A 10m maintained lawn/footpath interface is proposed along the development-facing edge of the rehabilitation areas. This interface is to be maintained in a low-fuel condition and provides the initial separation between hazardous vegetation and future development. Any additional separation required beyond the maintained interface is to be accommodated through future building siting and detailed design.

Future residential and industrial development applications must demonstrate compliance with the relevant bushfire planning and building requirements having regard to the BAL mapping shown in Figure 12. Future detailed applications must address building siting, access, construction standards, landscaping, operational layouts and, where relevant, storage or handling of hazardous materials.

REFUSE COLLECTION

25. ***The subdivision is reliant on the road network to the south being completed (202 Gardner Rd A006761597 - currently under assessment). Where the proposed sequence results in stub roads for future road connection, a temporary turnaround or easement must be***



demonstrated on amended plans in accordance with AO4.1/PO4 and AO9/PO9 of the Subdivision code.

Applicant Response:

It is noted that development application A006761597 (Southern Leg) has now been approved and the ultimate road alignment is now set. However, it is noted that the proposal does not necessarily rely on the road network to the south being completed, as there is a temporary access to Gardner Road approved on 198 Gardner Road as a part of development approval A005747839. If the Southern Leg was not to develop, this development application would seek a similar temporary access arrangement as outlined in A005747839 – however the Applicant would propose the temporary road to be provided under easement (as opposed to dedicated for road reserve).

Notwithstanding the above, the Applicant on this application is the same as the Applicant on the Southern Leg application (A006761597) in which there is an agreement between the owners of the subject site and the owners of 202 Gardner Road, Rochedale. It is the intent of the applicant to construct the 'southern leg' of the road under the ultimate alignment.

BIKEWAY

- 26. To demonstrate compliance with PO1 of the Infrastructure design code and PO3 & PO4 of the Subdivision code, demonstrate how the future trunk bikeway on the eastern side of the waterway corridor will link north to the new district road (with appropriate sight distances) from the waterway to the south, taking into account the difference in the new road levels (crossing the waterway) and the waterway fringe where the bikeway will be linking to the east of the site.**

Applicant Response:

The proposed future trunk bikeway connection has been incorporated into the current civil design. The proposed alignment extends along the eastern side of the waterway corridor and connects northward to the proposed district road. The alignment has been coordinated with the proposed road and waterway levels and provides a continuous connection through the site to the adjacent site at 323 Rochedale Road, Rochedale.

ADVICE - NATURAL ASSETS LOCAL LAW

- 27. The site is mapped with protected vegetation under the Natural Assets Local Law 2003 (NALL). The whole site is overlaid with Natural Assets Local Law (NALL) – Significant Urban Vegetation (SUV) and partly overlaid with NALL - Significant Native Vegetation (SNV); and NALL - Waterway and Wetland Vegetation (WWV). The Farley Road corridor is mapped as NALL – Council Vegetation (CV).**

Note: A permit to carry out works on protected vegetation must be obtained for any removal of protected vegetation that may be approved under a development application.

Applicant Response:

The Applicant has lodged requests for NALL Permits in accordance with existing approvals over the site. Any removal of protected vegetation will only be undertaken after receipt of a NALL Permit approval.