

**7 July 2026**

BCC Reference: A006512843  
Our Reference: 2729

BCC DS  
RECEIVED  
07/07/2026  
APPLICATION REF  
A006512843

The Chief Executive Officer  
Brisbane City Council  
GPO Box 1434  
Brisbane, QLD, 4001

**Via Email:** [DSPlanningSupport@brisbane.qld.gov.au](mailto:DSPlanningSupport@brisbane.qld.gov.au)  
[Kellie.hilton@brisbane.qld.gov.au](mailto:Kellie.hilton@brisbane.qld.gov.au)

## **RESPONSE TO INFORMATION REQUEST**

**MATERIAL CHANGE OF USE FOR  
HIGH IMPACT INDUSTRY (FUEL BURNING)  
11 INTERCHANGE PL ROCHEDALE QLD 4123  
DESCRIBED AS: LOT 1 ON SP288046**

Dear Kellie,

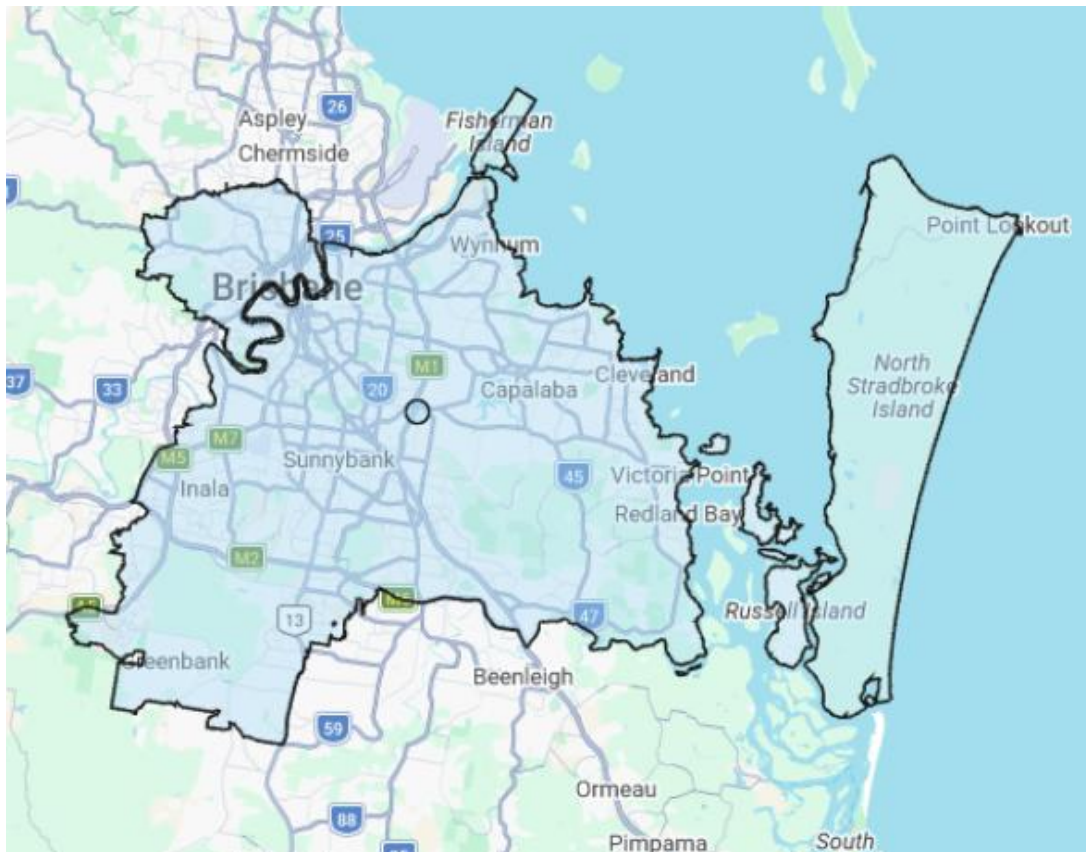
We refer to Council's Information Request dated 01 June 2026 made under the *Planning Act 2016*.

Planning Initiatives has been requested by the Applicant to provide a response in full to the further information requested in accordance with s13.2(a) of the DA Rules.

It is considered that the proposed development should to be considered in the context of the existing development the infrastructure will support, not limited to the proposed generator. As such in addition to a response to the Councils information request, this submission provides an updated overview of the context of the Woolworths Customer Fulfilment Centre (CFC) toward demonstrating the need for this infrastructure.

This response is supported by revised specialist reporting including acoustic and air quality engineering assessment.

The CFC performs a significant function in the supply and delivery of food and essential grocery items across South East Queensland including servicing 5 of the Moreton Bay Islands.



The CFC is experiencing significant demand and has observed 8% year on year growth currently servicing between 14,000 and 14,500 customers per week across the greater Brisbane area.

The CFC recently converted its fleet of diesel powered Home Delivery service vehicles to EV service vehicles. The proposed generator will also assist to facilitate this service during power outages.

It is anticipated that the proposed generator will be in use effectively during emergencies with the use estimated to be about 15 hours per annum on average including maintenance which will occur during the day.

Planning Need:

There is clear and genuine existing community demand, and moreover reliance, upon the continued operation of this service. Therefore, the protection of this food resource and service is critical for the city. Consideration should be given to the demonstrated need for this development.

For example, the Moreton Bay Islands are not adequately serviced by existing facilities in the context of the available services and technology available today on the mainland.

It is noted that there is a lack of alternative infrastructure with the regional capability and scale to provide essential goods as this CFC. The approximately 10,000sqm facility is the only CFC currently in QLD for Woolworths and there are no other similar facilities. No other supermarket operator has similar infrastructure in South East Queensland. These aspects compound the need to protect this essential resource through the introduction of a power supply generator.

The protection of food security and supply is a particularly prevalent concern on the back of the Covid-19 pandemic which saw supply constraints and subsequent panic buying impact most households.

More recently, the CFC performed a critical service during the more recent cyclone Alfred weather event as many supermarkets were closed during this time. The backup generator will ensure a guaranteed power supply to ensure this critical supply and distribution is protected during these events.

On the basis of the above it is considered that the community and social benefit of this proposed development clearly outweigh any potential adverse amenity impacts. However, this submission demonstrates that there is a lack of any potential adverse amenity impacts in any case.

## 2.0 DEVELOPMENT CONTEXT – SITE

Further to the above we provide the following circumstances for the development:

|                             |                                                                                               |
|-----------------------------|-----------------------------------------------------------------------------------------------|
| Submissions                 | <b>NO SUBMISSIONS RECEIVED</b>                                                                |
| SARA Response               | <b>NO OBJECTIONS</b>                                                                          |
| Approved Hours of Operation | <b>24 HOURS, 7 DAYS PER WEEK (CONDITION 10, A005851641)</b>                                   |
| Road Hierarchy              | <b>GARDENER ROAD – PRIMARY FREIGHT ACCESS ROAD (5 LANES INCLUDING SLIP LANE PLUS BUS STOP</b> |

### Road Hierarchy Mapping:



Primary Freight Access Road – City Plan 2014

### Sensitive Land Use Receptor Separation:



Nearmap 2026

### 3.0 INFORMATION REQUESTED:

#### Air Quality

1. The response to Council's Further Information Request, dated 18/05/2026, has been reviewed in addition to the model files submitted on 14/04/2026. However, the outstanding issues remain unresolved and have not been satisfactorily addressed. To meet the requirements of the Air Quality Planning Scheme Policy (AQ PSP) under City Plan 2000, please provide the following information:

- a) Provide the outstanding details previously requested and demonstrate good air quality modelling practices in accordance with Section 7 of the AQ PSP. This should include, but not be limited to, detailed justification of emission parameters, selection and identification of representative meteorological data, consideration of terrain effects, and assessment of building wake effects. While JT Environmental has stated that building wake effects have been considered and emission parameters can be identified within the

*model files, the remaining supporting information has not been provided. Please also include the basis and justification for the assumed emission parameters. It is noted that the surface file relates to meteorological inputs rather than terrain data, and review of the model files indicates that terrain has not been incorporated, with a flat topography assumed across the modelling domain.*

- b) Provide the maximum results for both the predicted concentrations for all areas and for sensitive receiving environment and compare them against the criteria in Table 3.*
- c) Provide the air quality model files if any amendments are made.*

### **Response:**

The applicant recognises the importance of mitigating harm and nuisance to nearby residents and the environment. As such, further air quality engineering advice has been obtained by JT Environmental with respect to the proposed operations to address this matter.

Reference is made to the Air quality assessment report provided within **Attachment 1**.

It is considered that the air quality assessment undertaken has applied a conservative methodology in the context of the proposed development.

It is reiterated that the site accommodates a major regional industrial land use supporting a large scale distribution operation with 24/7 operations, in addition to further land uses. The proposed emergency generator will contribute a negligible amount of emissions in comparison to the freight vehicles and operations lawfully existing at the centre.

Furthermore, there is a 5 lane primary freight access road separating the generator from the nearest sensitive land use receptors approximately 90 metres away. A reasonable assessment finds that there is no worsening amenity impact arising from emissions from the proposed generator.

### **Noise**

*2. The response letter by Palmer Acoustics, dated 13/05/2026, has been reviewed. The following information is requested to satisfactorily address PO2 of the Industrial Amenity and Performance Code (City Plan 2000).*

- a) Assess the noise impacts against the relevant criteria specified in the Noise Impact Assessment Planning Scheme Policy (City Plan 2000). The basis for adopting a criterion of background noise level +10 dB has not been clearly justified.*

*b) The operation of the generator under emergency conditions may occur outside daytime hours and could exceed 30 minutes. A conservative assessment scenario should therefore be considered.*

**Response:**

In compliance with Councils requests, Palmer Acoustics have been engaged to undertake a further acoustic engineering assessment with respect to the proposed generator.

Reference is made to the revised acoustic engineering assessment provided within **Attachment 2**.

Palmer acoustics have clearly established how the background noise level was arrived at in addition to a description of the conservative assessment scenario undertaken.

In consideration of the nature of the proposed development it is considered that no further acoustic engineering assessment is required.

Further to the above, it is noted that Gardener Road which separates the generator from the nearest sensitive land use receptors approximately 90 metres away, is a 5 lane primary freight access road.

Noting that the site has 24 hours of operations, 7 days per week, (Condition 10, A005851641), the road is capable and intended to accommodate significant heavy vehicular traffic at all hours with capacity to grow significantly.

Therefore, aside from acoustic engineering support including the introduction of an acoustic wall, when the proposal is considered against the site context, the noise generated on an infrequent and emergency only basis in this location is considered reasonable and acceptable.

**4.0 CONCLUSION:**

The information provided in this letter responds to the matters raised in the Council's Information Request dated 01 June 2026. Under the provisions of the Planning Act 2016 and part 3 of the DA Rules, the above represents a response in full to the Information Request.

Having removed concerns for any adverse amenity or environmental concerns, and taking consideration to the social need for the proposed infrastructure, it is considered that the proposed development is supportable in this instance.

The assessment finds that there is no worsening amenity impact arising from emissions from the proposed generator and that any noise impacts will be appropriately mitigated.

It is considered that all matters have been sufficiently addressed to demonstrate compliance with applicable assessment benchmarks and is therefore supportable by way of the issuance of a development permit.

Please do not hesitate to contact our offices should you have any questions or require further information.



**Liam Holliday**  
**PLANNING INITIATIVES**

## **5.0 ATTACHMENTS**

Attachment 1 – Air Quality Assessment Statement

Attachment 2 – Noise Impact Assessment Statement