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Community and the Arts Services
Sport and Recreation
Sport and Community Partnerships
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BCC DS
RECEIVED
17/06/2026
APPLICATION REF
A007052198

15 June 2026

Graeme Linklater
Treasurer
Brothers Rugby Club Inc

corporate@brothersrugby.com

Dear Graeme,

Re: In-principle support - development planning & design

Your organisation has requested consent from Brisbane City Council (Council) on 30 April 2026 to conduct the following works at Crosby Park, 103 Crosby Road, Albion.

- **Demolition of existing structure**
- **Construction of new community facility and changerooms**

Relevant Council stakeholders have been consulted and Council as landlord, supports your application **in-principle** with the following conditions:

1. **No works** will commence until the individual Application for Works have undergone full assessment and Brothers Rugby Club Inc have obtained a final decision letter.
2. Support is based on the information provided in the Application for works on a community leased site form and attached documents.

Prior to any works commencing the following has been provided to your Sport and Community Officer:

1. Agreed upon project commencement date and estimated project completion date.
2. Confirmation that a [private building certifier](#) has been engaged as the relevant building authority.

Provide a copy of the [approval decision notice](#) and all certified documentation and plans, as determined by the certifier.

If the certifier determines that the proposed works are self-assessable or do not require approval, this must be confirmed in writing and signed.

3. The following design considerations are provided to guide further refinement of the proposed clubhouse redevelopment and to mitigate operational, safety, accessibility and compliance risks. These matters are recommended for consideration during detailed design.

This feedback has been included as **Attachment A**.

Development Services

4. The location of the proposed works appears to be located in the Sport and recreation (district, local and metropolitan) zone and within the Albion neighbourhood plan. Where the works are proposed is also within the Flood overlay and Heritage overlay.

There is an existing approval for Outdoor sport and recreation and Indoor sport and recreation on land adjoining a Heritage place (Ref: A005364412).

A development application will be applicable for the proposed works as either a new development application or a change type development application. As part of any development application, assessment against the applicable assessment benchmarks (including but not limited to) the Flood overlay code and Stormwater code is required.

5. In accordance with the Planning Act 2016 (the Act), written consent from the landowner is required to be obtained before the lodgement of a development application.

To request landowner's consent for your development application, follow the steps below:

- Complete the relevant planning forms: DA Form 1 and or 2.
 - Submit completed planning forms, along with applicable building plans and attachments, and this letter of support, to AFW@brisbane.qld.gov.au
 - The AFW team will assess your request and issue a formal landowner consent letter via the nominated email address to you/your town planner for inclusion into the development application.
6. All works, construction materials and vehicles will need to be contained within the club's leased area in accordance with Council's Open Space Policy (OS01) to ensure public open space is not eroded by encroachments and other uses. Construction being within a leased area also ensures the lessee is responsible for any potential liability issues associated with management of construction works.
 7. Construction management plans will need to ensure safe and functional access is maintained through the existing carpark to the Meals on Wheels building/lease area throughout construction.

Access and Inclusion

8. First Floor Access (Ramp)
 - Prior to endorsement of detailed design, the applicant is to review the proposed ramp access to the first floor to ensure it provides a practical, equitable and dignified access outcome.
 - The ramp design must consider best-practice elements including appropriate width, provision of passing/rest spaces, weather protection, and user comfort.
9. Access to Second Floor
 - The applicant is to confirm whether the second-floor spaces are required to be accessible under the NCC and Premises Standards.
 - Where access is required, the design must demonstrate an equitable access solution to the second floor.
10. Accessible Showers
 - The design is to provide accessible shower facilities that are appropriately located within or directly adjacent to change rooms and distributed across user areas.
 - Accessible shower provision must support equitable use by all participants, including multiple user groups where applicable.
11. Access to Medical / First Aid Room
 - The accessible path of travel between the playing field and the medical/first aid room is to be reviewed to ensure it provides a practical, efficient and equitable access outcome.

- The design must minimise potential barriers to use, including excessive travel distances, constrained manoeuvring, gate obstructions and similar impediments.

12. Access Consultant Review (General)

- Prior to final design endorsement, the applicant must provide a report from a suitably qualified building certifier and access consultant (e.g. DDEG) addressing all access and inclusion matters, including any proposed performance-based solutions.

13. Prior to final design endorsement, Items 7 to 11 above must be addressed to Council's satisfaction. The applicant is to provide evidence of compliance that demonstrates all access and inclusion matters achieve a practical, equitable and dignified outcome. This must be supported by a report, including recommendations and any proposed performance-based solutions, prepared by a suitably qualified building certifier and access consultant (e.g. DDA consultant or DDEG), for Council review and endorsement.

Contaminated Land

14. Crosby Park is listed on the State Government's Environmental Management Register (EMR) for the notifiable activity of "Landfill", is marked in Council's system as 'contaminated land' and is known as Closed Landfill Site #1 - Crosby Road, Albion - Crosby Park.

The development at Crosby Park of a new Clubhouse Building will require contaminated land investigation, engineering design solutions and environmental management controls to be implemented during construction and operation of the building at this closed landfill site.

It is noted that Brothers Rugby Union Club has engaged a Contaminated Land Suitably Qualified Person (SQP) to conduct contaminated land investigations. However, the proposition of utilising one (1) soil vapour monitoring bore for the purposes of landfill gas risk assessment is not adequate and is not considered sufficient, particularly for the purpose of a building development on a closed landfill site.

Council requests the Club's Contaminated Land SQP re-evaluate their proposal, alongside the current version of the Club's proposed Clubhouse Building design plans, and increase the number of soil vapour bore / landfill gas monitoring well installations. We request the Contaminated Land SQP to obtain sufficient landfill gas monitoring data, and to confirm that there will be no potential exposure scenarios including specifically for the lowest level of the proposed Clubhouse building and provide this certification as a stand-alone Contaminated Land SQP Technical Memorandum.

The Crosby Park Clubhouse Development Landfill Gas Risk Assessment should be conducted with reference to, and in accordance with industry guidelines, including: NSW EPA's *Assessment and management of hazardous ground gases: Contaminated land guidelines, 2020*; and EPA Victoria's *Landfill gas fugitive emissions monitoring guideline, 2018*.

The AFW scope of works for the proposed Clubhouse Building Development is considered as a Medium to High level of risk for construction workers and future site users due to the likely extent of ground disturbance to the underlying landfill associated with the proposed improvement works.

Based on Council's review of the submitted AFW, we request the following contaminated land risks to be assessed and reconciled:

- Council expects a minimum of 3 x Landfill Gas Monitoring Wells are required to be installed to assess the potential landfill gas risks at this site. If the previously existing LFG wells still remain onsite then they should be assessed to determine if they are suitable to be utilised for the risk assessment for the proposed Clubhouse building;
- Review and confirm exposure scenarios where people have potential to be in contact with potential landfill gas - i.e. the gym is proposed on the lower level, and hence people will be exercising and inhalation risks increase in closest proximity to the potential landfill gas / accumulation risks;

- The Contaminated Land SQP is to obtain sufficient landfill gas monitoring data, confirm that there will be no potential exposure scenarios (including specifically for the lowest level of the proposed Clubhouse building), and provide Certification of “No / Negligible / Low Landfill Gas Risk” as a stand-alone Contaminated Land SQP Technical Memorandum;
- The Landfill Gas Risk Assessment for the Crosby Park Clubhouse Development should be conducted with reference to, and in accordance with industry guidelines including: NSW EPA’s *Assessment and management of hazardous ground gases: Contaminated land guidelines, 2020*; and EPA Victoria’s *Landfill gas fugitive emissions monitoring guideline, 2018*;
- Services installations all need to be designed to ensure they have excluded any potential for landfill gas migration and accumulation, i.e. plumbing and sewer connections from Change Room facilities on the lower levels, plant and equipment rooms, etc;
- The Contaminated Land SQP is also required to assess changes to overland flow and surface water flow paths, given the proposed building installation and building gutters as well as changes to internal road pavements, carparking, etc has the potential to alter the water infiltration regime into the existing Closed Landfill Site, i.e. potential changes to and/or increased leachate generation potential;
- Demolition of existing structures is not mentioned at all - this Site is an EMR listed site so Contaminated Land SQP advice and/or supervision will be required for demolition, ground surface disturbances, alterations of soil profiles, exaction and removal of existing in-ground and surface level installations and structures, etc; and
- Removal of trees onsite will require treatment of contaminated root-balls and disposal as per contaminated land industry protocols.

The lessee must engage a Contaminated Land Suitably Qualified Person (SQP) with experience and expertise in closed landfill characterisation, risk assessment, risk mitigation and design of infrastructure interacting with contaminated soil, leachate, waste, and landfill gas to assess and coordinate or provide direction on the following:

- a) Assess the closed landfill conditions (contamination, waste, leachate level, landfill gas) relating to the proposed ground disturbance areas and likely construction methods to build the proposed facilities. Include in the assessment, recommendations for applicable, relevant construction and landfill rehabilitation works, integrating designs for building footings, slabs, pavement, surfacing and service trenches with remediation and risk mitigation measures, such as low permeable landfill capping, low permeable 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.
- b) Confirm, advise on assessment of materials, and secure any approvals for sampling and off-site Contaminated Soil Disposal requirements of the project.
- c) Preparation of a construction environmental management plan (CEMP) to protect workers and the environment from buried waste (including asbestos), contaminated soil, leachate, landfill gas and confined space entry risks.
- d) Supervise construction activities which will disturb ground surfaces, expose potentially contaminated material, expose potential landfill gas and conduct landfill gas monitoring during works to ensure exposure scenarios are acceptable for construction works and site users.
- e) Prepare a brief Post-Works Validation Report confirming the design and construction of the improvement 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.

The lessee should refer to the Queensland Government's advice on engaging a Suitably Qualified Person, which can be viewed at this website:

<https://www.qld.gov.au/environment/pollution/management/contaminated-land/qualified-persons/engaging-qualified-persons>

Council is aware that the Australian Contaminated Land Consultants Association Queensland (ACLCA QLD) maintains a list of ACLCA QLD Member businesses which can demonstrate that the company has 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/>

The Queensland government also has a guideline on Assessing a Suitably Qualified Person, which can be viewed at:

<https://www.detsi.qld.gov.au/global/policy-register/policy-register-pdf?getdoc=1938&name=cl-gl-assessing-suitably-qualified-person.pdf>

The lessee should be advised that, due to the level of risk associated with the proposed works, the SQP's investigations, design measures, remediation options, implementation of contaminated land management aspects of the Construction Environmental Management Plan, and integrated construction management solutions must be reviewed and approved by Council prior to any works commencing on site.

Council may appoint a third-party certified contaminated land specialist (i.e. Contaminated Land Auditor) to peer-review the above documentation and advise on the suitability and efficacy of the SQP's recommendations to achieve the remediation, risk mitigation and design objectives. Please ensure the lessee is made aware of this "gated" process.

Council is in possession of a number of reports and monitoring and investigation data that may assist the SQP in their site assessment. NEWS can make this information available to the SQP under the terms of a signed Data Sharing Agreement, once they have been appointed. NEWS Contaminated Land team staff are also available to meet with the lessee to discuss all the above if necessary.

Vegetation

15. The lessee will need to provide an Arboricultural Impact Assessment (AIA) report which reflects the current proposed recommended tree removals, retention strategies, and tree protection measures, in accordance with *AS 4970 2009 Protection of Trees on Development Sites*.

Please provide an updated planting replacement species list and their proposed locations. The current plan appears to have some conflicts with pathways and other site elements, so a revised layout is required.

Please be aware that a permit to remove trees will be required under the Natural Asset Local Law. More information is available on Council's website: <https://www.brisbane.qld.gov.au/laws-and-permits/licences-permits-regulations/protected-vegetation-permits>

Particular attention is drawn to the fact that you will be required to pay an offset to Council for the loss of tree canopies. Any offset charged is to be paid before the NALL permit will be issued permitting the removal of the trees.

Tree removal is to be minimised wherever practicable, noting the significant cost of canopy replacement.

Trees T24, T25 and T26 are to be retained, unless it can be demonstrated to Council's satisfaction that retention is not feasible, having regard to their significance and maturity.

16. Any changed development approval will require a Detailed Landscape Plan and a Vegetation Management Plan (VMP) to be submitted and approved prior to building works commencing. This is a separate process from the NALL application described above,

however the Landscape Plan/VMP will need to incorporate the proposed removal of trees and any replacement vegetation proposed under the NALL process.

Mandatory requirements:

17. Any works carried out on the premises will be required to meet the [National Construction Code](#) and relevant [Australian Standards](#).
18. All works must be carried out by a contractor(s) licensed by the [Queensland Building and Construction Commission \(QBCC\)](#).
19. All electrical works must be undertaken by a [licenced Queensland electrical contractor](#) and be in accordance with AS/NZS 3000:2018.
20. Tenant and contractors should review sites Asbestos Management Plan for proposed installation locations and manage works according to safe work practices.
21. All plumbing works must be completed by a [QBCC licenced plumbing contractor\(s\)](#). [Plumbing approval](#) may be required prior to the commencement of works.
22. [An online application](#) is mandatory for vehicle access to, or to undertake works within, Council parkland. The lessee is responsible for rectifying any turf damage or ground depressions resulting from such access.
23. As your project involves surface disturbance or excavation, any discovery of potential contaminants, such as asbestos, fill material (including ash), or construction and demolition waste, must result in the immediate cessation of works. You must immediately notify your Sport and Community Officer upon such discovery.
24. The worksite must be fully enclosed using temporary metal modular fencing with a minimum height of 1800mm, compliant with AS 4687:2007.
25. All works must commence within a two year period from the date of this support letter.

Within 10 days of completion of works the following must be provided to your Sport and Community Officer:

26. Provide a copy of the [final approval decision notice](#) or equivalent issued by the [private building certifier](#), along with copies of all certified documentation, plans and photographs of the completed works.

If the certifier has determined that the works are self-assessable or do not require approval, a [Form 30 QBCC Licensee Aspect Certificate for Accepted Development \(Self-Assessable\)](#) must be provided by the QBCC licensed contractor.

27. As Built Drawings supplied upon completion.
28. The electrical contractor must provide a signed [Electrical Safety Certificate](#) and test report.
29. A [Form 4 – Notifiable Work](#) must be submitted, in accordance with the requirements of the [Plumbing and Drainage Act 2018](#).

For any further enquiries, please contact your Sport and Community Officer via email or on 07 3403 8888 and quote reference 23420580.

Yours sincerely



Matt Wardlaw

Sport and Community Team Leader
Sport and Community Partnerships | Sport and Recreation
Community and the Arts Services | **BRISBANE CITY COUNCIL**

Ref: OL 23420580

For the purpose of [section 142 of the Property Law Act 2023 \(Qld\)](#), this letter is a decision notice.

The following design considerations are provided to guide further refinement of the proposed clubhouse redevelopment and to mitigate operational, safety, accessibility and compliance risks. These matters are recommended for consideration during detailed design.

1. Lift Provision and Accessibility Compliance

Lift requirements should be confirmed at an early stage, with adequate space allocated within the design, even if installation is staged. Retrofitting a lift at a later stage is costly and often not feasible without significant redesign.

Given that the first floor is publicly accessible, and the second floor incorporates corporate boxes, coach facilities and commentary/broadcast functions, lift access to all occupied levels is required to meet National Construction Code (NCC) accessibility requirements and Disability Discrimination Act (DDA) obligations.

If a stair lift is to be installed, ensure the stair width is sufficient to accommodate the lift and general usage at the same time (particularly if emergency evacuation is required).

2. Under-croft Security (CPTED)

The under-croft area should be fenced or otherwise secured to address Crime Prevention Through Environmental Design (CPTED) principles. This will reduce opportunities for rough sleeping, concealed hiding areas, graffiti, and illegal dumping.

3. Medical Room Location

It is recommended that the medical room be located on the ground floor to enable efficient stretcher access from the field, direct internal access to the clubhouse, and suitable ambulance access.

4. Archive Space

The inclusion of a dedicated archive space is not considered a priority for Council.

Council also questions the inclusion of archive storage at ground level given the potential for flooding and the loss of irreplaceable items being stored in the archive.

Consideration should be given to replacing this area with general storage. If project budget constraints arise, removal of the archive space should be considered.

5. Ventilation Strategy

Adequate exhaust ventilation should be provided throughout the facility to ensure appropriate air quality and to avoid reliance solely on air-conditioning systems.

6. Change Room Drying and Ventilation

Unisex change rooms should be designed with sufficient drying capacity and ventilation. These spaces are often under-designed and require particular attention to prevent moisture-related issues.

Where possible, the building design should facilitate cross ventilation in the change rooms (e.g. via high level openings that facilitate air flow while maintaining privacy).

7. Secure Storage

Provision should be made for lockable storage in medical equipment and change rooms for players and referees in order to support secure operations during training and match days.

8. Queuing and Circulation Space

Adequate queuing / circulation areas should be confirmed and accommodated near the bar/service area and entry doors leading to the terrace, particularly during peak event use.

9. After-Hours Security

The design should incorporate suitable after-hours security measures, such as roller shutters or lock-down capability, to protect internal areas when the facility is not staffed.

10. Coach Box Future-Proofing

Coach boxes should be designed to accommodate future technology upgrades, including larger screens, additional desks and evolving performance and broadcast requirements.

11. Acoustic Separation

Appropriate acoustic separation should be provided between the filming/broadcast room and the corporate box to avoid operational conflicts and noise transfer.

12. Canteen

The canteen is proposed as a dry facility at initial operation. Provision should be made within the design to allow for the future installation of a grease trap should cooking or food preparation activities be expanded.

13. Male amenities (first floor)

It appears there is a 'change area' or similar within the male toilets on the first floor (adjacent to the office and meeting room). This area could be better utilised as storage space, particularly for furniture, etc for the club room (very minimal storage space is currently proposed in the club room). It is also noted that a 'cleaner's storeroom' is not included in the plans.

14. Environmental Planning and Flood Resilience

It is recommended that the applicant consider flood resilient design for larger flood events and the influence of climate change into the future (eg raised storage within archive area, flood resilient building materials, easily washed out areas, raised electricals etc).

15. Accessible Parking bays

Please confirm with the private certifier that the proposed number, location and design of accessible parking bays comply with the applicable code requirements, that is the building class.

16. Accessible sanitary & shower facilities

Where multiple toilet banks are provided, consideration should be given to the distribution of accessible sanitary facilities to ensure they are available to all user groups and are located on an accessible path of travel. It is recommended that at least one accessible sanitary facility be provided within or in close proximity to each major toilet bank or functional area, rather than relying on a single facility to serve the entire first floor that will have all players, participants and spectators.

Where multiple shower facilities are provided, accessible shower facilities should be provided in a manner that supports equitable use by all user groups, including players and participants. Consideration should be given to distributing accessible showers within or adjacent to change room facilities, rather than providing a single isolated accessible shower elsewhere in the building. This will support inclusive participation and usability, in addition to meeting minimum compliance requirements.

Company owner's consent to the making of a development application under the *Planning Act 2016*

I, Julie Byth

[Insert name in full.]

Authorised representative of the authority mentioned below.

and I, Natalie Scalora

[Insert name in full.]

Authorised representative of the authority mentioned below

Of Brisbane City Council

the company being the owner of the premises identified as follows:

103 Crosby Road, Albion

consent to the making of a development application under the *Planning Act 2016* by:

Brothers Rugby Club

c/- Mewing Planning Consultants Pty Ltd

on the premises described above for:

Change Application (Minor Change pursuant to s81 of the Planning Act) to Development Permit for Material Change of Use and Development Permit for Building Works (A005364412)

Company Name and ACN: **Brisbane City Council**



.....
Signature of Authorised Representative

9/6/2026

.....
Date



.....
Signature of Director/Secretary

9/6/2026

.....
Date