

Our Ref: DA6564.1
MSLink/s: 8001
Council Ref: A007038637

30 July 2026

Brisbane City Council
GPO Box 1434
BRISBANE QLD 4001

Origin Property Management Pty Ltd
C/-Town Planning Alliance
PO Box 7657
EAST BRISBANE QLD 4169

Attention: Errin Xiaofang Lu
Via Email: Errin.Lu@brisbane.qld.gov.au

Attention: Melissa Grant
Via Email: m.grant@tpalliance.com.au

Dear Errin,

Referral Agency Response (Advice)

(Given under Section 9.2 of the Development Assessment Rules)

Transmission Infrastructure Impacted	
Transmission Corridor	Richlands – West Darra (110 kV) Transmission Line Corridor
Easement ID	A on RP113460 (Dealing No. 602416607)
Location Details	
Street address	816 Boundary Road RICHLANDS QLD 4077
Real property description	Lot 1 & 2 on RP83710
Local government area	Brisbane City Council
Application Details	
Proposed development:	Material Change of Use low impact industry, medium impact industry and warehouse
Approval sought	Development Permit

We refer to the above referenced development application which has been referred to Powerlink Queensland in accordance with Section 54 of the *Planning Act 2016*.

In accordance with its jurisdiction under Schedule 10 Part 9 Division 1&2 of the *Planning Regulation 2017*, Powerlink Queensland is a **Referral Agency (Advice)** for the above development application.

Specifically, the application has been triggered for assessment by Powerlink Queensland because:

1. For **material change of use** – all or part of the premises are subject to a transmission entity easement which is part of the transmission supply network (Division 2, Table 2 1b)

PLANS AND REPORTS ASSESSED

The following plans and reports have been reviewed by Powerlink Queensland and form the basis of our assessment. Any variation to these plans and reports may require amendment of our advice.

Table 1: Plans and Reports upon which the assessment is based

Drawing / Report Title	Prepared by	Date Assessed	Reference No.	Version / Issue
Site Plan	CPO Architects	30/07/2026	DA-090	5
Floor Plan Ground			DA-100	6
Floor Plan Level 1			DA-101	2
Roof Plan			DA-110	1
Typical Office Layout (Types 1 & 2)			DA-120	1
Overall Elevation			DA-300	2
Stage 01 - Elevation			DA-301	2
Stage 02 – Elevation			DA-302	2
External Finishes Proposal			DA-350	4
Stage 01 – Section A-C			DA-400	2
Stage 02 – Section A-C			DA-401	2

Powerlink Queensland, acting as a Referral Agency (Advice) under the *Planning Regulation 2017* provides its response to the application as attached (**Attachment 1**).

Please treat this response as a properly made submission for the purposes of Powerlink being an eligible advice agency in accordance with the *Planning Act 2016*.

For further information please contact the Property Management Team on (07) 3898 4090 or via email property@powerlink.com.au who will be pleased to assist.

Yours sincerely,



for:
Laura Donaldson
Property Management Team Leader

ATTACHMENT 1 – REFERRAL AGENCY (ADVICE) RESPONSE

Powerlink Queensland objects to this application for the following reasons:

1. Infrastructure context

The development site is traversed by transmission line Easement: A on RP113460, registered under Dealing No. 602416607. At 20 metres wide the easement is relatively narrow and accommodates Powerlink's Richlands–West Darra transmission corridor, comprising Feeders 710 and 707 operating at 110kV. Tower Structure 1001-STR-0173 is located within the transmission easement and forms part of this high-voltage transmission infrastructure.

Powerlink's easement rights include the construction, operation, inspection, maintenance, refurbishment and replacement of its electricity infrastructure, together with ongoing access to that infrastructure. Development within or adjoining the easement must not compromise:

- the electrical safety of workers, site occupants or the public;
- the safe and reliable operation of the transmission network;
- statutory electrical clearances and exclusion zones;
- the structural integrity and earthing system of Tower 1001-STR-0173;
- Powerlink's access to its infrastructure;
- Powerlink's ability to undertake routine and emergency works; or
- the exercise of Powerlink's registered easement rights.

The narrow easement (20m wide) provides limited separation between the transmission infrastructure and the proposed development. It is therefore particularly important that the development maintain appropriate separation or buffers from the tower and conductors and that high-risk industrial activities are located outside the easement.

2. Horizontal clearance from structures

Schedule 4, Part 4, item 4 of the *Electrical Safety Regulation 2013* prescribes minimum horizontal clearances between high-voltage conductors and greenfield development. For a 110 kV overhead electric line, the minimum horizontal clearance for greenfield development is 6.0m and covers the building and construction tolerances. This clearance must be maintained under the relevant conductor operating conditions, including maximum conductor blowout toward the proposed structure.

Powerlink's modelling indicates a maximum blowout of 10.1m from the centre line of the relevant span (1011-STR-0173 to 0172). Applying a 6.0m horizontal clearance from the maximum blowout shows that the proposed eastern elevation encroaches the horizontal clearance and is non-compliant with the *Electrical Safety Regulation 2013*. This encroachment represents an unacceptable electrical safety risk and the affected warehouse building and office must be redesigned or set back to comply.

As part of this correspondence a DWG file will be provided to show the maximum blowout and can be used to determine how much of the proposed warehouse building encroaches the horizontal clearance.

The amended plans must demonstrate the required clearance to the closest part of the building, including:

- walls and windows;
- awnings and roof overhangs;
- gutters and downpipes;
- roof-mounted equipment;
- any other projecting building element.

3. Proximity to Tower 1001-STR-0173

Transmission towers require clear working space around the structure to allow routine inspection, maintenance, refurbishment and emergency works. These activities may require large maintenance vehicles, cranes, elevated work platforms and other specialised plant. All buildings, structures, retaining walls, fences, services and other fixed infrastructure must be located outside a 20 metre by 20 metre tower maintenance area measured from the outermost projection of the tower base.

The submitted plans show Tenancy 1.7 and retaining walls (1.2m-2.2m high) located approximately 3.72m and 2.5m from the nearest leg of Tower 1001-STR-0173, respectively. This separation is unacceptable. The proposed location of Tenancy 1.7 and retaining walls would:

- encroach substantially upon the required tower maintenance area;
- restrict access by cranes, elevated work platforms and heavy maintenance vehicles;
- impede routine inspection, maintenance and emergency works;
- constrain the establishment of a safe work area around the tower;
- increase risks associated with the tower foundations and earthing system;
- expose future occupants and infrastructure to electrical safety risks under fault conditions; and
- restrict Powerlink's ability to safely operate, maintain, refurbish or replace its infrastructure.

The proximity of an occupied warehouse and office to the tower may also expose persons, vehicles and conductive infrastructure to risks associated with earth potential rise, transferred potential and step-and-touch voltages during a phase-to-earth fault. Tenancy 1.7 must therefore be removed or relocated to maintain the required tower maintenance area. The amended layout must also ensure that no awnings, retaining walls, fences, services, lighting, landscaping, car parking or other fixed infrastructure encroach upon this area.

4. High-risk loading and unloading activities within the easement

The proposed plans show an operational hardstand adjoining the eastern elevation of Tenancies 1.6, 2.12 to 2.17 and 2.1. The warehouse roller doors open directly onto this hardstand, making it a principal loading, unloading and servicing area for the development. The refuse collection area is also located within the transmission easement.

A substantial proportion of the usable hardstand is located beneath the 110 kV transmission lines and within CSA+5m. The proposed layout would therefore direct a range of foreseeable high-risk industrial activities into close proximity to the energised conductors, including:

- loading and unloading heavy vehicles;

- operating forklifts, cranes and other mobile plant;
- lifting and handling freight, equipment and materials;
- manoeuvring heavy vehicles;
- temporary storage or stockpiling of goods and materials; and
- moving and servicing bulk refuse bins.

Given the number of warehouse tenancies and the wide variety of plant, equipment, vehicles and materials that could be used on the site, these risks cannot reasonably be controlled through conditions of development approval or future operational procedures.

Schedule 2 of the Electrical Safety Regulation 2013 prescribes a 3.0-metre exclusion zone for operating plant operated by an untrained person near a 110 kV overhead uninsulated electric line. The exclusion zone is measured from the bare conductor and applies to every part of the operating plant and anything the plant is handling.

Powerlink's available survey information indicates that the current conductor-to-ground clearance across the relevant parts of the hardstand ranges from approximately 9.14 metres to 12.8 metres. After applying the statutory 3.0-metre exclusion zone, the available vertical operating envelope beneath the conductors is reduced to approximately 6.14 metres to 9.8 metres. Plant, equipment or loads used for loading, unloading, lifting or material handling could readily extend into the exclusion zone. Any such encroachment would be unacceptable and contrary to the requirements of the *Electrical Safety Regulation 2013*.

The risk may be further increased by:

- conductor sag and sway;
- changes to finished ground or hardstand levels;
- uneven terrain or instability of operating plant;
- unexpected movement of plant, booms, forklift tyres or loads;
- the dimensions and conductive nature of materials being handled; and
- human error during routine loading and unloading operations.

The *Electrical Safety Code of Practice 2020 – Working near overhead and underground electric lines* provides practical guidance for meeting the duties established under the *Electrical Safety Act 2002* and *Electrical Safety Regulation 2013*. The Code identifies elimination as the most effective risk control and provides that the best way to eliminate the hazard is to prevent people, plant, equipment and materials from coming close enough to energised overhead lines for direct contact or flashover to occur. The Code also recognises that:

- physical contact with a conductor is not necessary for an electric shock to occur;
- operating plant and anything being handled by it must remain outside the applicable exclusion zone;
- the potential movement, sag and sway of overhead conductors must be considered;
- unexpected movement of plant or loads can result in entry into an exclusion zone; and
- administrative controls depend on ongoing human behaviour and supervision and provide a lower level of protection than eliminating or physically separating the activity from the hazard.

The proposed layout does not apply this design-led approach. Instead, it establishes operational hardstand beneath the transmission lines and relies on future operators, delivery personnel and contractors to safely manage a permanent and foreseeable electrical hazard during everyday industrial activities. The hardstand could also be used for the storage or stockpiling of metallic or other conductive materials within CSA+5m. In addition to reducing the available clearance beneath the conductors, conductive materials and equipment located near high-voltage transmission lines may create risks associated with electrical induction and step-and-touch potentials, particularly during an electrical fault.

These risks are inconsistent with Powerlink's *Management of Easement Co-Use Requests – Guideline*, which provides that:

- activities that may create a public safety risk should not occur on a transmission line easement;
- potential risks include electrical induction, step-and-touch potentials and infringement of conductor safety clearances;
- exclusion zones applicable to operating plant must be maintained;
- machinery and equipment must not infringe the exclusion zones prescribed by Schedule 2 of the Electrical Safety Regulation 2013; and
- activities presenting an unacceptable level of risk or hindrance to Powerlink's operations are not supported within transmission line easements.

The current proposal would embed these risks into the permanent layout and ordinary operation of the development. Powerlink therefore considers the proposed hardstand arrangement unacceptable on electrical safety grounds.

5. Requested design changes

To address the above electrical safety and operational risks, the applicant is requested to redesign the development and provide amended plans incorporating the following changes.

A. Achieve statutory conductor clearances

Relocate the footprint of the affected warehouse building to provide a minimum setback necessary to maintain the statutory conductor clearance. The amended design must demonstrate that the minimum 6.0m -metre horizontal clearance is maintained under maximum conductor blowout conditions. Amended site plans, elevations and cross-sections must be provided to demonstrate compliance.

A. Redesign the building layout, retaining walls and refuse collection area

Remove or relocate tenancy 2.7 and retaining walls so that all buildings, offices, awnings, structures, fences, services and fixed infrastructure are located outside the required 20 metre by 20 metre tower maintenance area associated with Tower 1001-STR-0173. The area made available by removing or relocating the affected tenancy could potentially accommodate the refuse collection area outside the transmission easement, subject to maintaining Powerlink access. The amended plans must clearly show:

- the surveyed location of the base or leg of Tower 1001-STR-0173;
- the required 20 metre by 20 metre tower maintenance area (removal of tenancy 2.7 would suffice);
- a suitable heavy-vehicle access route to the tower; and

- the setbacks between the tower maintenance area and all proposed buildings, retaining walls and works.

C. Restrict activities within the transmission easement

Redesign the hardstand and parking layout so that land within the transmission easement is limited to:

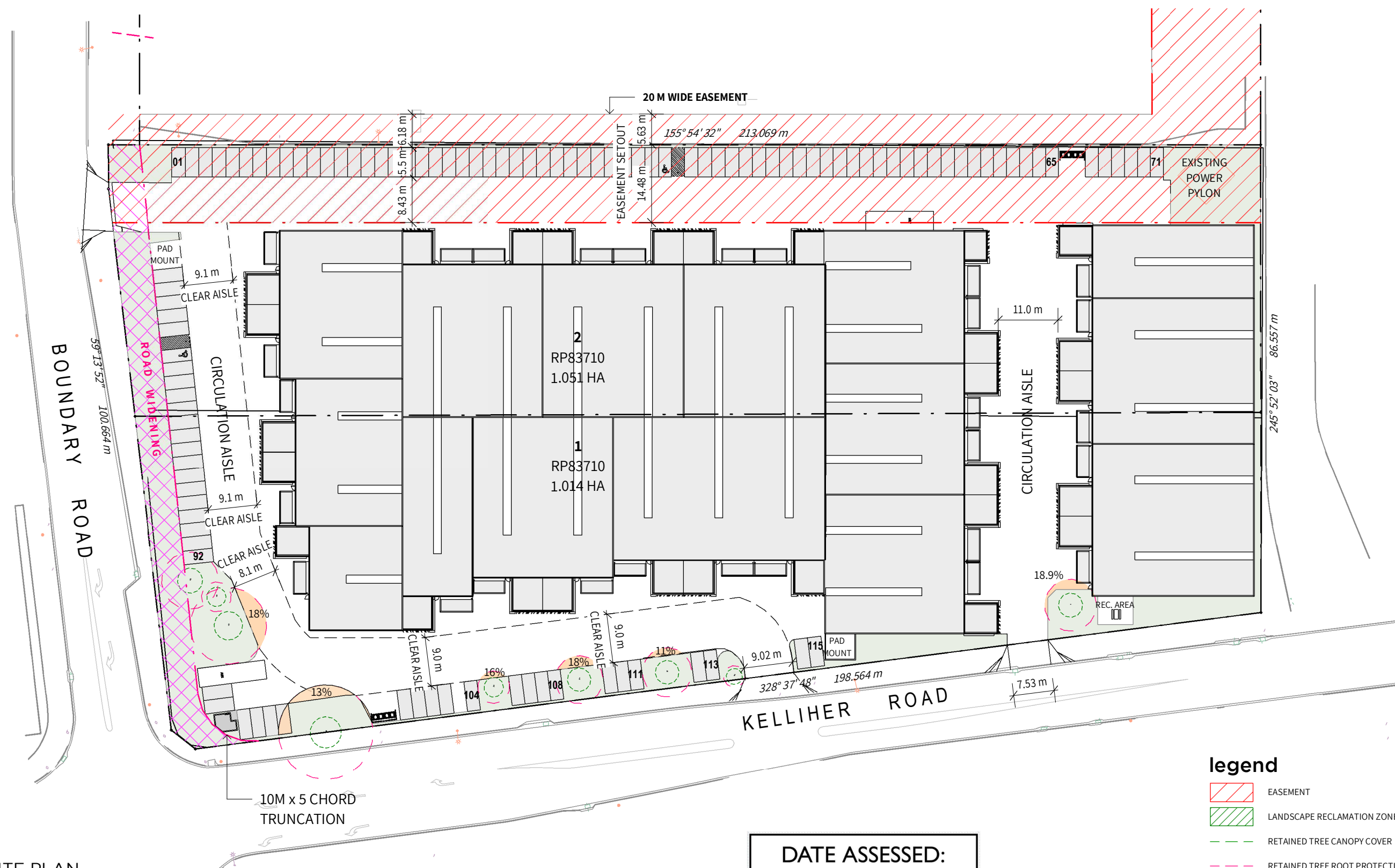
- visitor parking for standard passenger vehicles;
- vehicle movement areas; and
- low-level landscaping comprising turf or groundcover that does not exceed 1.0 metre in vertical height at maturity.

Loading and unloading areas, operational hardstand, outdoor storage, stockpiling, bulk-bin collection and areas intended for the operation of lifting equipment or mobile plant must be located outside the transmission easement and CSA+5m. Any parking or vehicle movement area retained within the easement must not encroach upon the tower maintenance area.

D. Reorient the warehouse roller doors

Redesign the affected warehouse tenancies so that the roller doors face away from the transmission lines and easement and open toward an operational hardstand located outside the easement and CSA+5m. This arrangement would remove or substantially reduce the likelihood of loading, unloading, lifting, storage and stockpiling occurring beneath the transmission lines and would provide a safer environment for future occupants, delivery personnel and visitors.

ATTACHMENT 2 – ASSESSED PLANS



A SITE PLAN

1: 750 @ A3

DATE ASSESSED:

30/07/2026



legend

- | | |
|---|------------------------------------|
|  | EASEMENT |
|  | LANDSCAPE RECLAMATION ZONE |
|  | RETAINED TREE CANOPY COVER |
|  | RETAINED TREE ROOT PROTECTION ZONE |
|  | ROAD WIDENING |
|  | TREE ROOT ENCROACHMENT AREA |



dwg no. DA-090
job no. 20260006

revision
5



A FLOOR PLAN - GROUND
1: 500 @ A3

DATE ASSESSED:

30/07/2026



Legend

- EASEMENT
- LANDSCAPE RECLAMATION ZONE
- RETAINED TREE CANOPY COVER
- RETAINED TREE ROOT PROTECTION ZONE
- ROAD WIDENING
- TREE ROOT ENCROACHMENT AREA

dwg no. DA-100
job no. 20260006

revision
6



A FLOOR PLAN - LEVEL 1
1: 500 @ A3

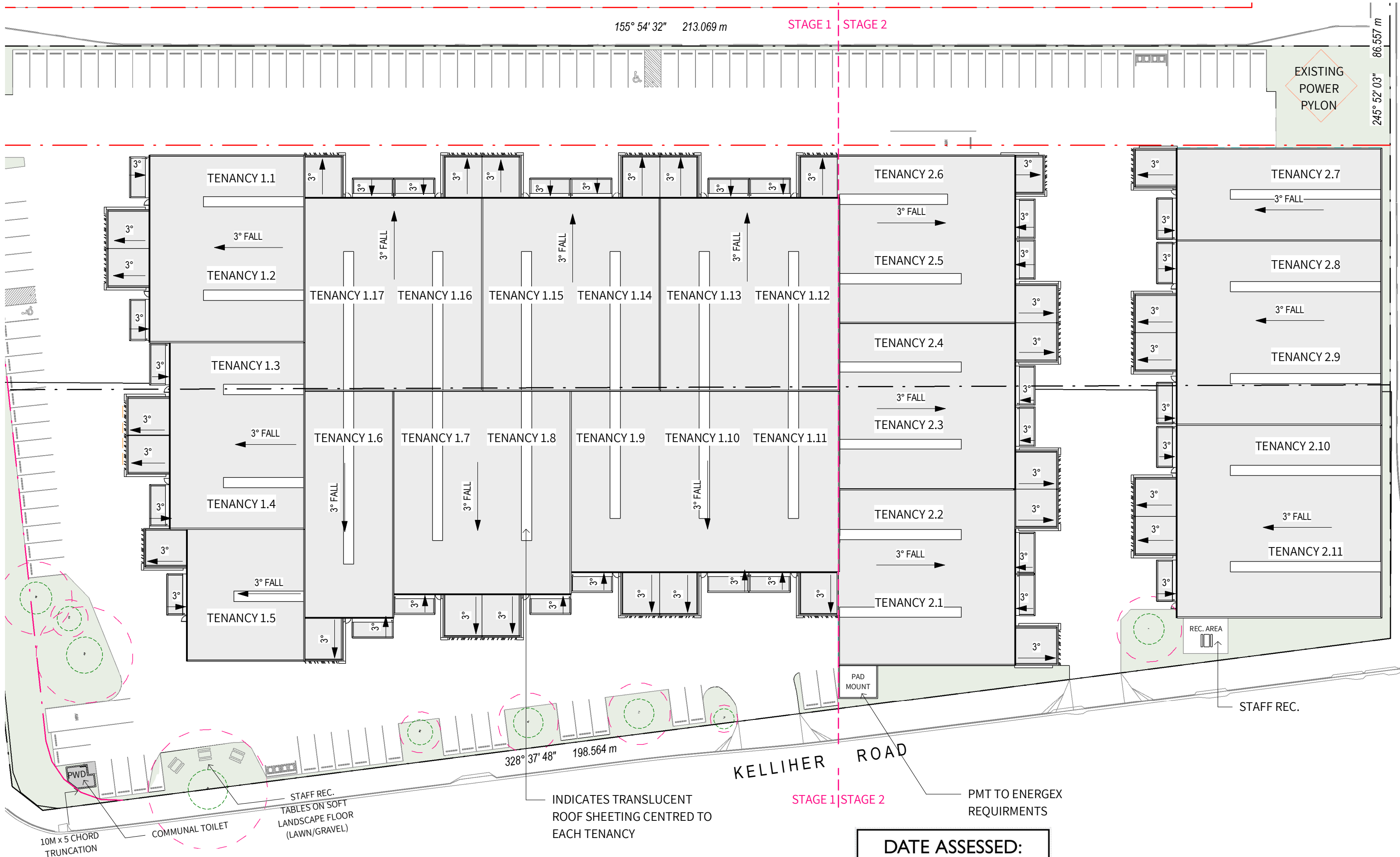
DATE ASSESSED:

30/07/2026



dwg no. DA-101
job no. 20260006

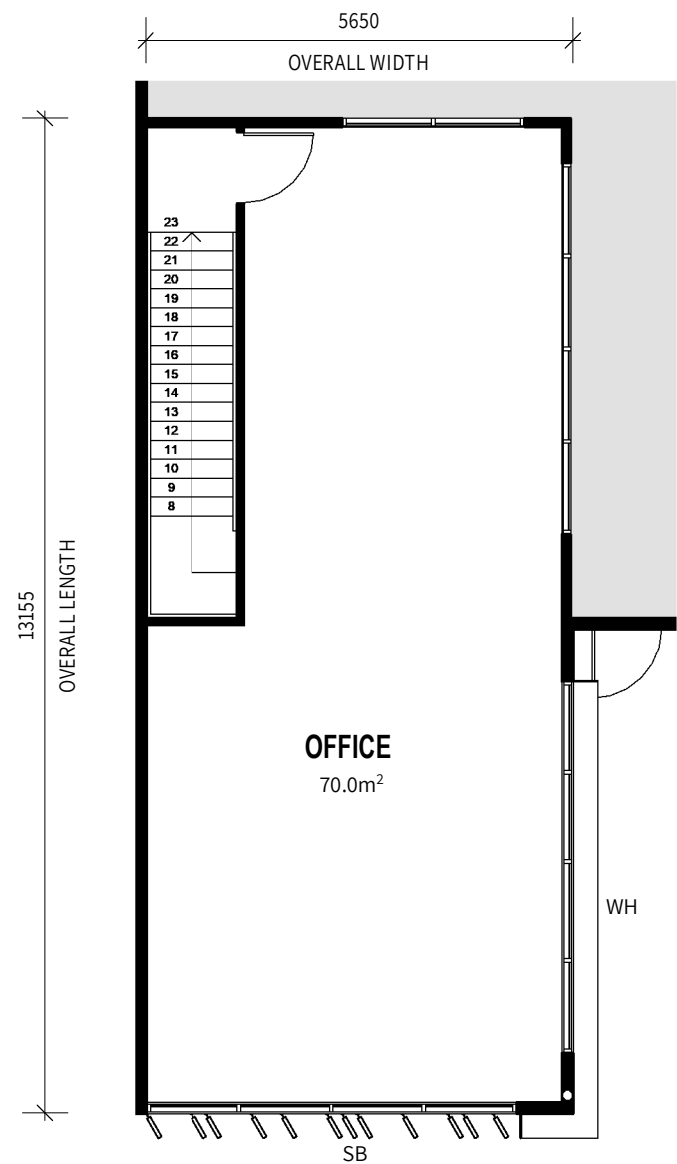
revision
2



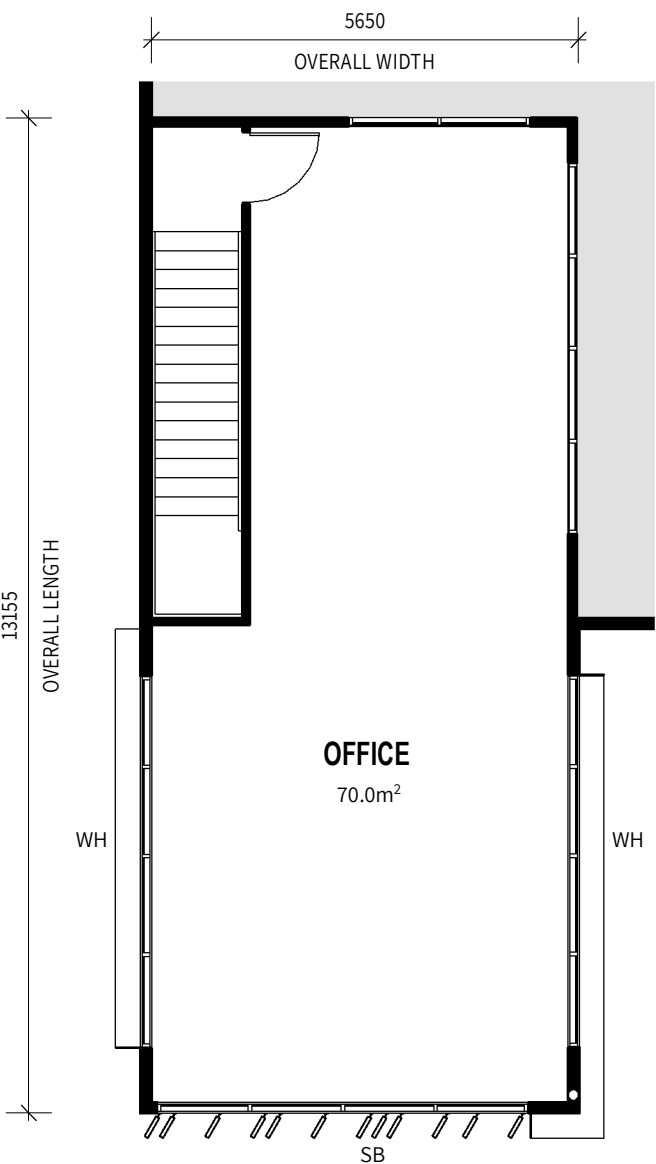
DATE ASSESSED:

30/07/2026

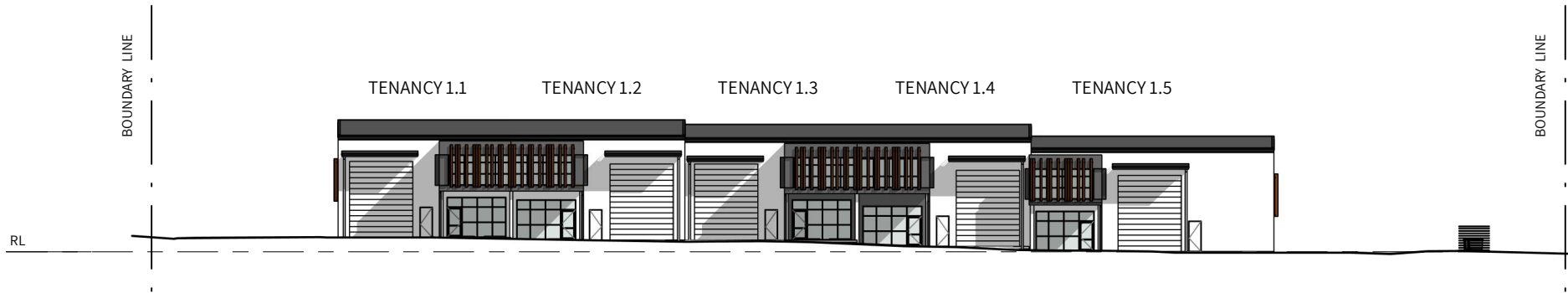




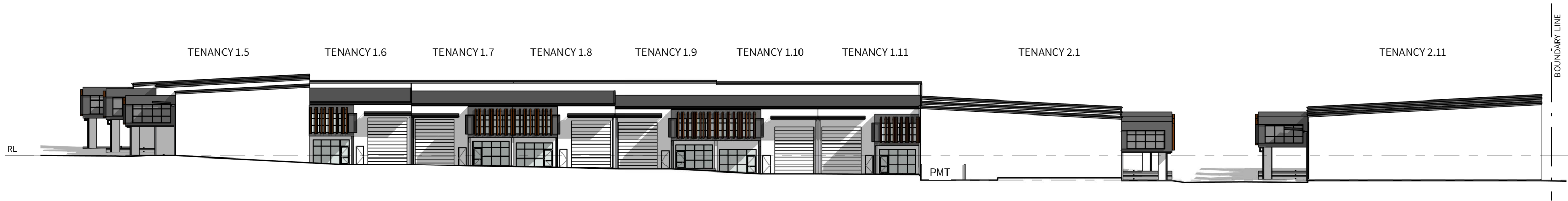
A TYPICAL OFFICE LAYOUT TYPE 1
1 : 100 @ A3
STANDARD OFFICE WINDOW 2 SIDED EXT



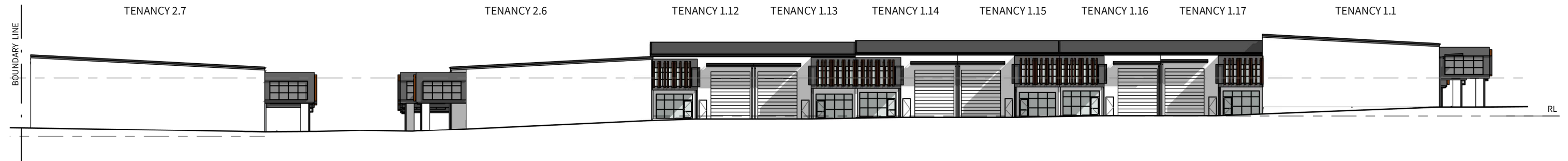
B TYPICAL OFFICE LAYOUT TYPE 2
1 : 100 @ A3
STANDARD OFFICE WINDOW 3 SIDED EXT



1 OVERALL ELEVATION - BOUNDARY ROAD
1: 500 @ A3

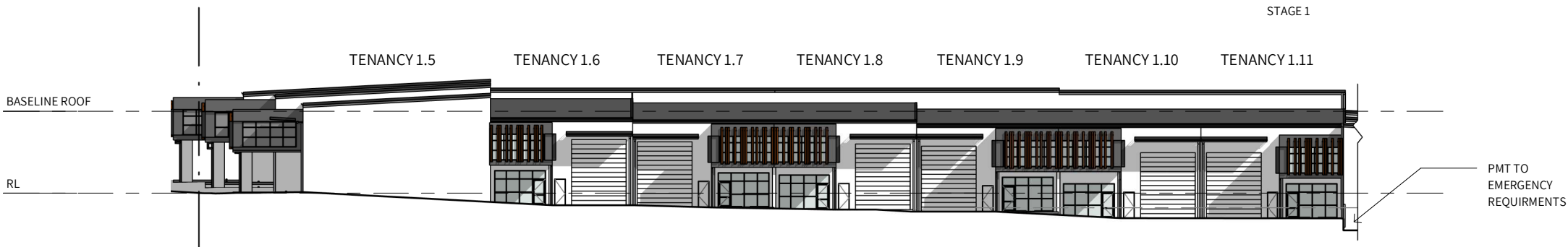


2 OVERALL ELEVATION - KELLIHER ROAD
1: 500 @ A3

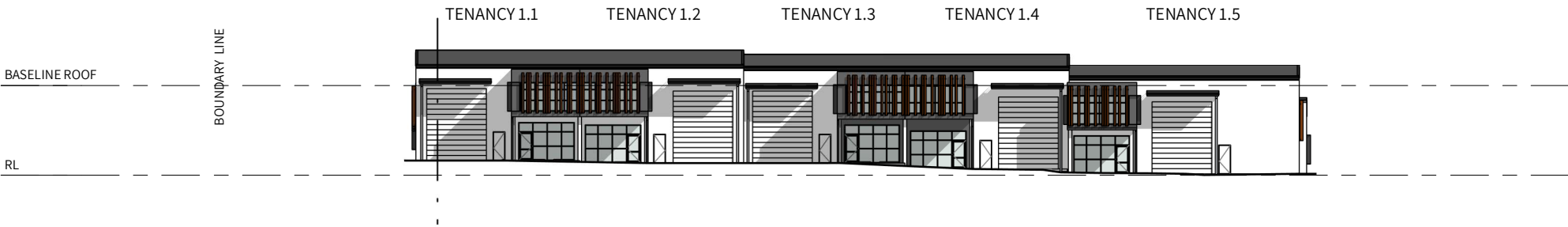


3 OVERALL ELEVATION - REAR
1: 500 @ A3

DATE ASSESSED:
30/07/2026

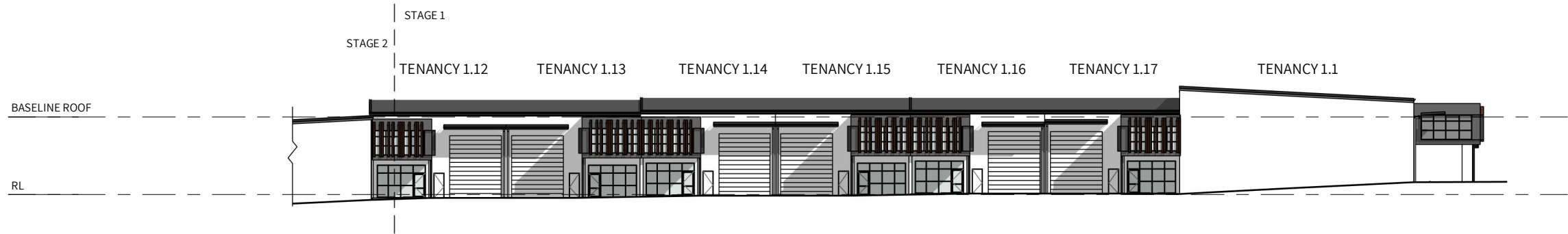



1 Stage 01 - Elevation A - Street (Kelliher)
1: 500 @ A3

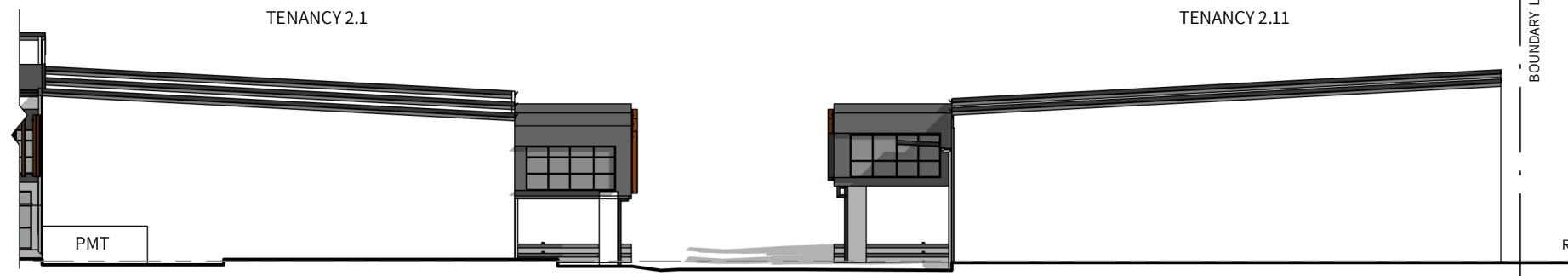


2 Stage 01 - Elevation B - Street (Boundary)
1: 500 @ A3

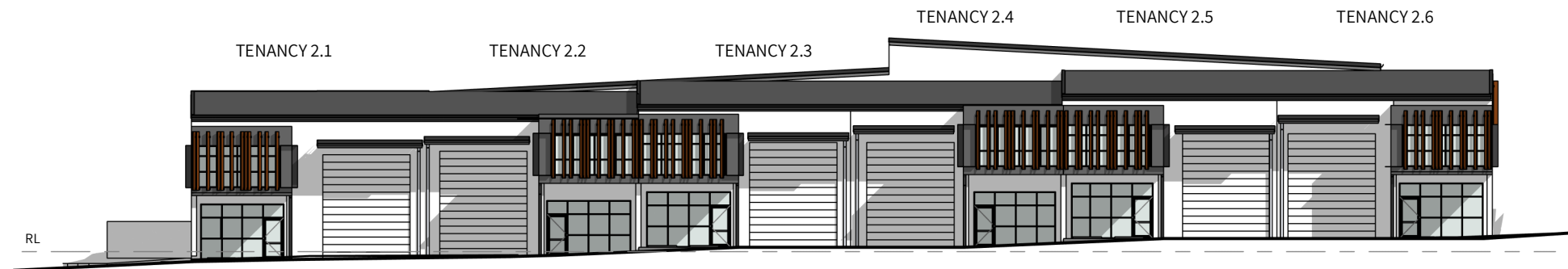
DATE ASSESSED:
30/07/2026

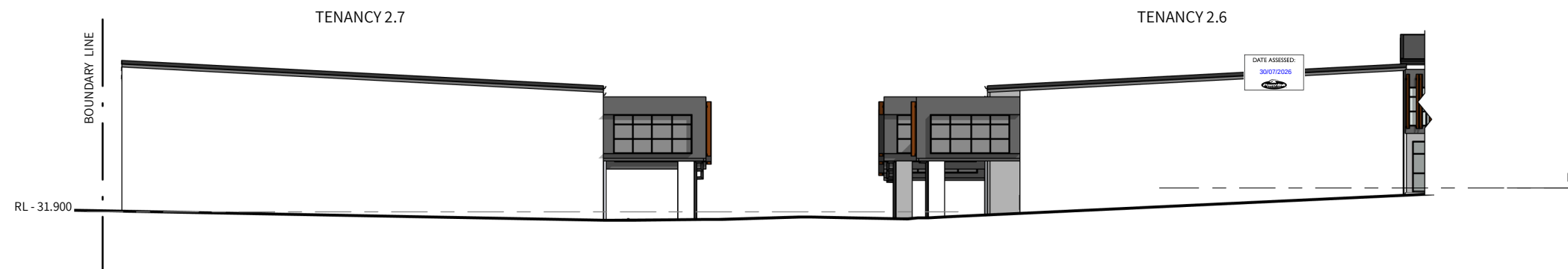
3 Stage 01 - Elevation C
1: 500 @ A3



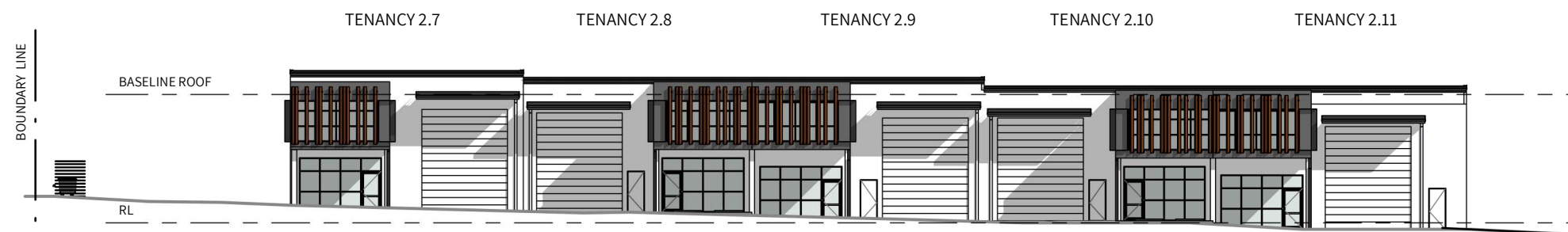
1 Stage 02 - Elevation A - Street
1: 350 @ A3



2 Stage 02 - Elevation B - North
1: 350 @ A3



3 Stage 02 - Elevation C - East
1: 350 @ A3



4 Stage 02 - Elevation D - South Facade
1: 350 @ A3

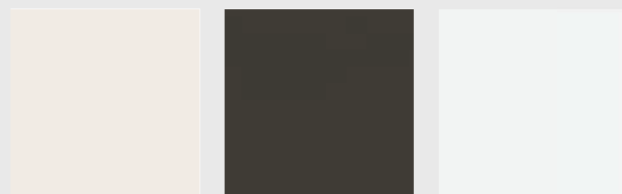
DATE ASSESSED:

30/07/2026



External Finishes Proposal

paint finish (PF)



Natural White Monument Flat White

concrete walls & egress doors (CW)



Zues Gothic Blue White on White

roof flashings / gutters (RF)



Basalt Monument

sunblades (SB)



Tassie Oak Spotted Gum



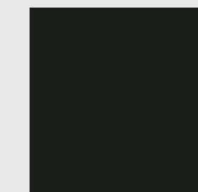
816 BOUNDARY ROAD, RICHLANDS

External Finishes Proposal



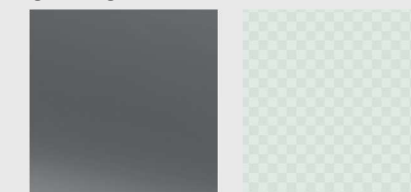
Glazing Unit

glazing frames (GF)



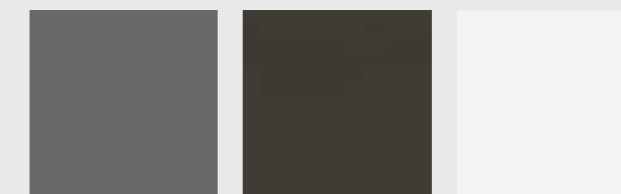
Black Sky

glazing panels (GP)



Grey Clear

roller shutter (RS)

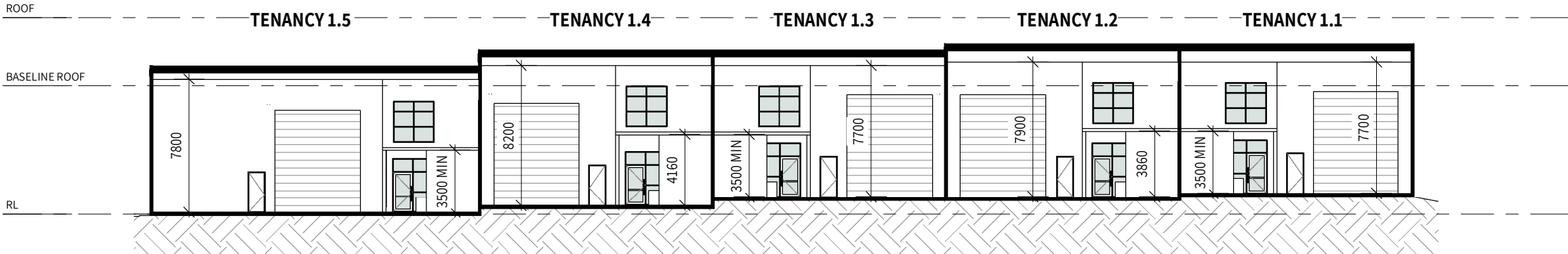


Basalt Monument Flat White

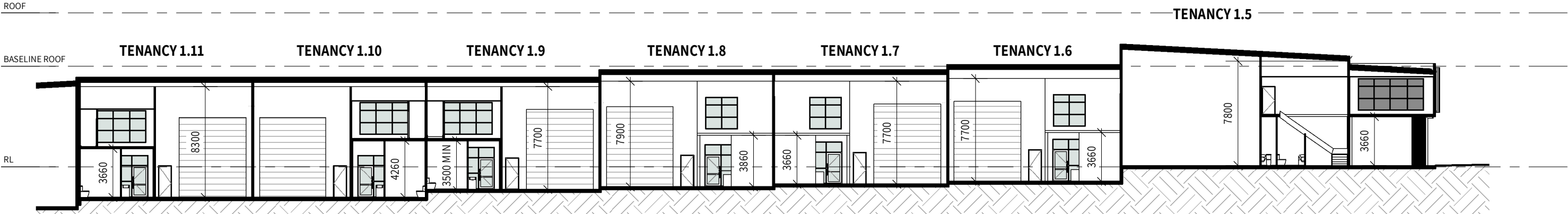
DATE ASSESSED:

30/07/2026

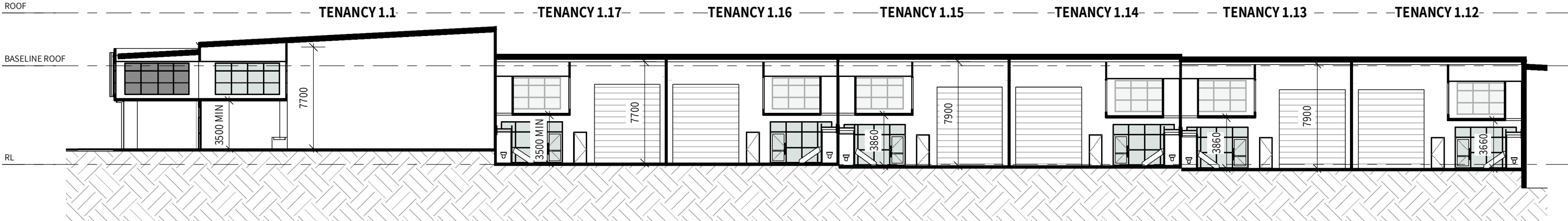




A Stage 01 - Section A
1: 300 @ A3



B Stage 01 - Section B
1: 300 @ A3

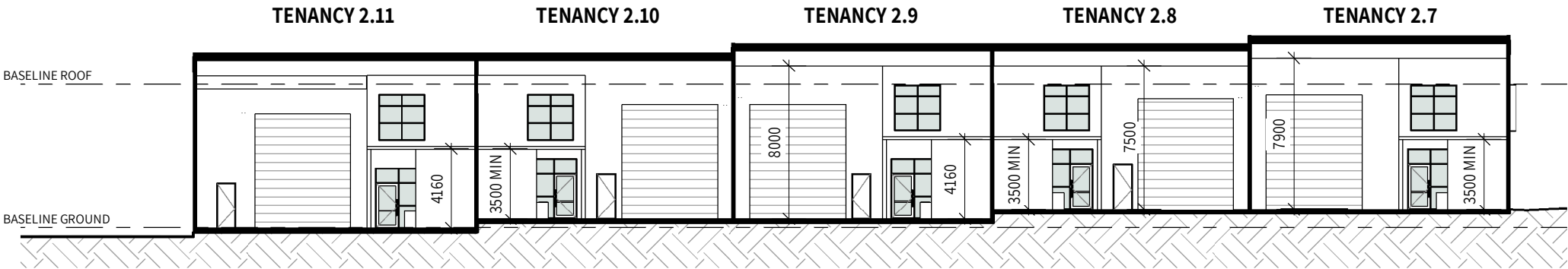


C Stage 01 - Section C
1: 300 @ A3

DATE ASSESSED:

30/07/2026





DATE ASSESSED:
30/07/2026

