



*Dedicated to a better Brisbane*

15 May 2026

Logan D&C  
C/- HPC Planning Australia Pty Ltd  
PO Box 15038  
CITY EAST QLD 4002

**ATTENTION: Borisa Miletovic**

**Application Reference:** A007002317  
**Address of Site:** 267 SHERBROOKE RD WILLAWONG QLD 4110

Dear Borisa

**RE:** Information request in accordance with the Development Assessment Rules

Council has carried out an initial review of the above application and has identified that further information is required to fully assess the proposal.

### **Landfill Gas**

1. It is acknowledged the site is within close proximity to the former Willawong Waste Transfer Station and the submitted Town Planning Report notes the landfill gas reporting undertaken as part of the development application for the adjoining site to the north. As landfill gas does not move uniformly and is unpredictable, reference to previous reports and differing sites does not address the assessment benchmarks of the Lower Oxley Creek North neighbourhood plan (LOCNNP) code.
  - a) To address PO1 of the LOCNNP code provide a Landfill Gas Preliminary Site Investigation Report that:
    - i) Engages 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;

*Note 1 - 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-gl-assessing-suitably-qualified-person.pdf](https://environment.des.qld.gov.au/data/assets/pdf_file/0030/89823/cl-gl-assessing-suitably-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 SQP in accordance with the Environmental Protection Act 1994: <https://aclca.com.au/qld/our-members-qld/>*

- ii) Conducts a Preliminary Site Investigation in accordance with the *National Environment Measure (Assessment of Site Contamination) Measure 1999* (as amended in 2013) (NEPM) and the following:
- As part of the Preliminary Site Investigation, the SQP must undertake historical aerial photography review for the Site and confirm whether 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, and 2023);
  - As part of the Preliminary Site Investigation, the SQP must also conduct a Landfill Gas Risk Assessment (LGRA), given the development site's proximity to the Willawong Closed Landfill Facility (i.e. NPP-001 Willawong renewable energy, and BPP-002 Limited development as shown in the Lower Oxley Creek north precinct boundary online Brisbane City Plan mapping)
  - The Landfill Gas Risk Assessment must 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/corporate-site/resources/contaminated-land/19p2047-hazardous-ground-gases-guidelines.pdf?la=en&hash=877EF007BFDEAF5163431351EB3C5A73FCBF7EFE>);

*Note 2: 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.*

*Note 3: 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:*

- *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.*
- *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.*

- 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.
- 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.

## Refuse Collection

2. In accordance with PO17/AO17.2 of the Industry code, PO19/AO19.1, AO19.2, AO19.3 of the Transport, access, parking and servicing code, and PO8/AO8.1 and AO8.2 of the Infrastructure code, provide the following:

- a) Amended architectural plans demonstrating both refuse storage areas are either within a building (within a room) or a refuse enclosure (roofed and wholly screened) with a minimum GFA of 4.65m<sup>2</sup> (internal dimension of 3.2m x 1.5m). The dimensions must be clearly demonstrated on the amended plans. Ensure to denote 'Roofed and wholly screened refuse enclosure'. Remove reference to indicative bins;

*Note: Where screening is utilised to form part or all of a refuse storage area, the screening is to have a maximum of 25% openings, with a maximum opening dimension of 50mm, and are to be permanently fixed, durable and maintainable.*

- b) Clearly demonstrate the intended refuse enclosure access points, doors, gates or the like; and
- c) Submit a revised RPEQ certified swept path analysis for an RCV (As per standard drawing BSD-3008-2) which demonstrates safe and efficient entry and exit manoeuvres in a forward gear.

*Note: Council core services include general refuse, commingles recycling and green waste. To support sustainable development and landfill diversion, Council encourages the use of its green waste service. If the development is proposing to utilise the green waste service from Council, amend the proposed plans to demonstrate sufficient storage for the required number of 240L green waste mobile garbage bins. Refer to:*

*<https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/about-council/documents/waste-management-technical-notes.pdf.coredownload.pdf>*

## State Planning Policy Bushfire mapping

3. The site is mapped as Potential Impact Subcategory within the State Planning Policy Natural hazards, Risk and Resilience bushfire mapping, triggering assessment against sections A and B of the Bushfire overlay code.

PO1 of the Bushfire overlay code requires that development within the Bushfire overlay addresses bushfire hazard determined by a bushfire hazard assessment and achieves the relevant radiant heat exposure threshold. Additionally, if any hazardous chemical exceeding the amounts specified in Table 8.2.5.3.D are proposed to be stored on site, development must demonstrate that it does not cause unacceptable risk to people, property and the environment as a result of a bushfire impacting the site (PO10). The following information is required in response to the Bushfire overlay code:

- a) Provide a site-specific bushfire hazard assessment in accordance with the Bushfire Planning Scheme Policy or other approved methodology. Where within a bushfire prone area, provide a radiant heat exposure assessment to demonstrate compliance with PO1 of the Bushfire overlay code. Bushfire reporting and hazard assessment guidelines are available within the technical assessment guide for Bushfire reporting available on Council's website; and

*Note: If the bushfire hazard assessment determines a hazard score of 'low', no further assessment against the code is required. If a hazard score of 'medium' or 'high' is determined, an assessment against relevant sections of the code and a Bushfire Management Plan are required.*

- b) Provide an assessment against the relevant sections of the Bushfire overlay code, based on the findings of the Bushfire reporting.

### **Stormwater Quality – Stormwater Quality Management Plan**

4. Submit a digital copy of the MUSIC modelling file for assessment.

### **Urban Utilities (UU)**

Council does not undertake water and sewer assessment of any planning applications. Contact UU on (07) 3432 2200 to discuss any water and sewer issues and whether you are required to submit an application to UU for assessment.

### **Responding to this request**

Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to [DSPlanningSupport@brisbane.qld.gov.au](mailto:DSPlanningSupport@brisbane.qld.gov.au) quoting the application reference number A007002317.

Please phone me on telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely



Justin Lynham  
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Planning Services South  
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