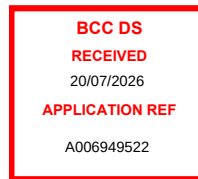


20 July 2026

Emily Hutchinson
Principal Town Planner
Plan A Town Planning Pty Ltd
emily@planatp.com.au



Dear Emily

Re: A006949522 - 200 Bradman Street, Sunnybank Hills

I refer to the Development Application for a Material Change of Use – Development Permit for Indoor Sport and Recreation located at 200 Bradman Street and Sunnybank on land described as Lot 15 on RP884135 (the site). The location of the site is shown in Figure 1 below and is surrounded by both industrial land and also residential land.

In their letter dated 9 March 2026, Brisbane City Council (the Council) requested further information as follows (the request):

2. *Further demonstration is required to ensure that there is adequate separation distance from existing industrial uses.*
 - a. *Provide details that the proposed use complies with the separation distances outlined in AO27/PO27 of the Industry code.*

PO27 and AO27 of the Industry Code are as follows:

PO27	AO27
Development for indoor sport and recreation: a. is located, designed and constructed to achieve the air quality (planning) criteria in Table 9.3.12.3.B, odour criteria in Table 9.3.12.3.C and health risk criteria in Table 9.3.12.3.D; b. does not compromise the intended industrial function of land in the Industry zone, General industry B zone precinct and General industry C zone precinct, and Special industry zone.	Development for indoor sport and recreation is located no closer to an industrial use than the distance stated in Table 9.3.12.3.J.

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Table 9.3.12.3.J refers to separation distances for medium impact industry A, B, high impact industry and special industry. While Table 9.3.12.3.J requires defined separations distances, I note, as shown in Figure 1 below that the site does not sit within the Industrial Amenity Investigation Area (nor the hazard investigation area). Therefore, the site should not be treated like a new use in an area that has not been considered as part of an industrial amenity investigation area.

The Industrial Amenity Investigation Area is within 8.2.13 *Industrial amenity overlay code*. The purpose of the code, amongst other things, is to, at 8.2.13. 1. b *“Provide for the assessment of the suitability of development of land within the Industrial amenity overlay considering the health and wellbeing of occupants”*. The intent of the code is also to also limit sensitive uses encroaching industrial land.

Under the City Plan 2014 the proposed use, sport and recreation, doesn't fall under the definition of a Sensitive Use in Schedule 1 Definitions. Therefore, the site is low risk as it doesn't sit within the investigation area and it is not defined as a sensitive use in the City Plan.

Regarding the definitions, the use of a site can be used to define whether it is sensitive to long term impacts from potential air emissions. Generally speaking, a dwelling would generally be considered more sensitive than a park. This is because, amongst other things, a dwelling can be assumed to be permanently inhabited, and if impacts were to occur, these would occur over a longer term due to ongoing exposure.

Moreover, regarding nuisance impacts, something is more likely to annoy someone, and lead to nuisance if they are at home, rather than being away from home at a sport and recreation facility. As such the existing separation distances are considered suitable for a non-residential use.

Regarding potential emissions from the sites within the area, it is noted that significant impacts would need to occur at the site in order for infrequent use as a sport and recreation site to lead to health and or wellbeing impacts. Significant impacts across the area where workplaces and dwellings are continually used by the same people would be evident well before similar impacts would be evident at the site.

Therefore, I conclude that the use, which does not involve people residing at the site does not compromise the intended industrial function of land in the surrounding industrial areas, and PO27 (b) is met.

If you have any questions, please contact me.

Yours sincerely

A handwritten signature in black ink, appearing to be "GG" followed by a flourish.

Geordie Galvin

B.Eng (Env Eng) M.Eng (Env) MIEAust F.AirQual
Principal Environmental Engineer



Figure 1: Site (blue polygon) and Industrial Amenity Investigation Area (hatched area)