

Good afternoon Kayal,

In relation to the above development application, please find attached Energex submission as an Adjoining Landowner.

The public notification period for the development application commenced on 27 August 2026 and will end on 9 October 2026.

This correspondence is provided in the form of a properly made submission pursuant to the provisions of the Planning Act 2016.

Should you have any queries, please do not hesitate to contact me.

Kind regards,



positive energy

28 August 2026

Brisbane City Council
GPO Box 1434
Brisbane QLD 4001
C/- the Assessment Manager (Attn: Kayal Chandrasekar)

Via Email: dalodgement@brisbane.qld.gov.au

Dear Kayal,

**Energex Submission as an Adjoining Landowner in relation to a proposed Development Application at 184 & 198 Gardner Road and 56 Farley Road, Rochedale (Council Ref: A006940193)
Our Ref: ECM 39477661-42405582**

We write regarding the development application made over land at 184 & 198 Gardner Road and 56 Farley Road, Rochedale, formally described as Lot 102 on SP226721 and Lots 3 and 6 on RP114765. The development application seeks approval for the following aspect of development: -

- Development Permit for Reconfiguring a Lot (3 into 15 Lots, New Road and Drainage Reserves); and
- Preliminary Approval that includes a Variation Request to vary the effect of the Brisbane City Plan 2014 for a Material Change of Use for Multiple Dwelling; Low Impact Industry and Warehouse.

Council's reference number for this application is A006940193.

The public notification period for the development application commenced on 27 August 2026 and will end on 9 October 2026. This correspondence is provided in the form of a properly made submission pursuant to the provisions of the *Planning Act 2016*, because it: -

- is in writing to the Assessment Manager, Brisbane City Council;
- has been lodged within the consultation period;
- states the name and business or residential address of the submitter;
- has been signed by the submitter;
- states a postal and email address for service; and
- includes the grounds of the submission.

Grounds of Submission

Energex Limited was given notice of the proposed development application as the owner of the adjoining land at 182A Gardner Road, Rochedale, formally described as Lot 103 on SP226721. This land has been acquired for the future establishment of an electricity substation necessary to support the ongoing growth and electricity supply needs of the surrounding area.

Energex is also the registered holder of Easement A on SP226721, which provides access from Gardner Road to the future substation site. The provision of reliable, safe, unrestricted and ongoing access is essential, as the substation site does not have frontage to a public road. Furthermore, adjoining Lot 7 on RP114765 is privately owned and is not intended to be dedicated as road reserve, reinforcing the critical importance of Easement A as the sole lawful means of vehicular access to the future substation site.

It is noted that, in its capacity as a referral agency, Energex raised several concerns as part of its Information Request. However, the applicant's Information Response did not incorporate the amendments sought by Energex in relation to the proposed access arrangements for Lots 17 to 19.

While Energex does not object to the proposed development in principle, it remains concerned that the development, as currently proposed, may prejudice the function, safety and long-term availability of Easement A as the primary route for access and installation of critical infrastructure to service the future substation site. Accordingly, Energex's principal concerns relate to the following matters:

1. Lots 17, 18 & 19

The application continues to propose access to Proposed Lots 17–19 from Gardner Road via a private access road located within Easement A on SP226721, which is burdened by:

- Dealing No. 714514630 in favour of Energex for Electrical Works; and
- Dealing No. 714514631 in favour of Lot 103 on SP226721 (future Energex substation) for Access and Services.

Energex acknowledges that Dealing No. 714514631 does not provide exclusive access rights. However, Dealing No. 714514630 preserves Energex's ability to fully exercise its easement rights, including restrictions on the installation of services within the easement and activities that may impede access to, or operation of, Energex infrastructure.

Easement A was established to secure both access to the future substation on Lot 103 SP226721 and the installation, maintenance, repair and future augmentation of underground electrical infrastructure servicing the site. This function is critical, as the future substation does not have direct road frontage and Easement A represents the only secure and lawful corridor for access and electrical works.

While the applicant's response concludes that the proposal is unlikely to create operational issues for Energex, it does not adequately address how access to Proposed Lots 18 and 19 would be maintained during periods when Energex is required to occupy, secure or close all or part of the easement to undertake infrastructure construction, maintenance, augmentation, or future substation works.

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Under the current proposal, Proposed Lots 18 and 19 would have no lawful access to Gardner Road other than via Easement A, creating an unacceptable reliance on the easement land that must remain available to meet Energex's ongoing operational requirements. Although reducing the number of lots accessing the easement from three to one may not materially alter the site's ultimate development yield, it would significantly reduce the planning and operational constraints on Energex's ability to exercise its rights under the registered easements.

Accordingly, Energex maintains its objection to the proposed access arrangement, as it introduces unnecessary constraints on the delivery, operation, maintenance and future augmentation of critical electricity infrastructure and creates potential conflicts with future landowners and tenants whose access would be wholly dependent on the easement corridor.

It is submitted to Council that: -

- The proposed subdivision layout be amended to reduce the number of lots relying on Easement A on SP226721 for access from three (3) lots to a single lot only.
- Alternatively, where this is not feasible, the applicant should amend the application to dedicate the proposed private access road as public road reserve, constructed to Council's applicable local road standard.

2. Stormwater Infrastructure

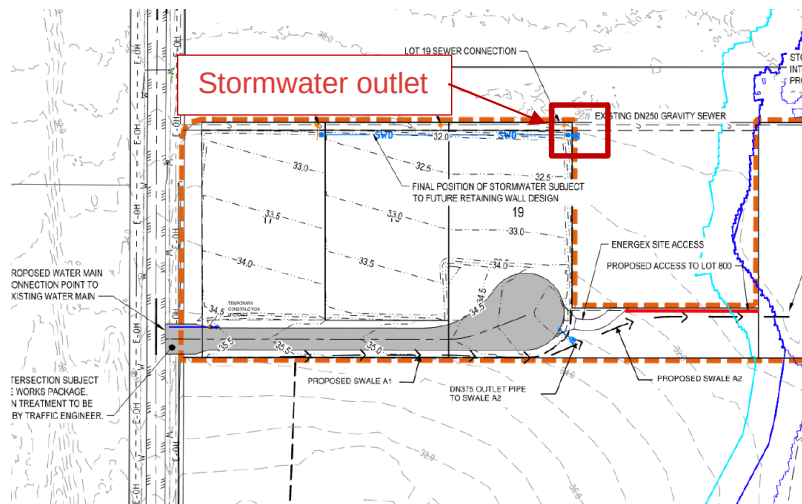
Energex acknowledges the amended Engineering Plans and Civil Engineering Response Letter prepared by Arcadis in response to the Referral Information Request. As part of this response, Arcadis has provided a revised servicing arrangement in Figure 1 (below). Figure 1 of Arcadis's response appears to depict a proposed stormwater outlet discharging onto Energex's Lot 103. Accordingly, Energex also has concerns in relation to the following matters:

Energex does not support the discharge of stormwater infrastructure onto its land. Council's infrastructure design planning policy require stormwater to discharge to Council stormwater infrastructure, kerb and channel, or another lawful point of discharge, rather than onto adjoining private land. The arrangement shown in Figure 1 does not demonstrate compliance with these requirements.

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It is submitted to Council that: -

- The applicant is required provide amended plans and supporting documentation that demonstrate that:
 - o No new stormwater infrastructure is proposed to discharge directly onto Energex's Lot 103
 - o All stormwater infrastructure associated with the development discharges to a lawful point of discharge.
 - o The proposed stormwater discharge arrangement complies with Council's infrastructure design planning policy

Having regard to the strategic importance of the future substation site and the essential role of Easement A in facilitating access to critical electricity infrastructure, Energex respectfully requests that Council give due consideration to the matters raised in this submission when assessing the application.

Should you require any further information on the above matter, please contact Harriet Veal on 0427 293 604 or via email at townplanning@energex.com.au.

Yours faithfully,

Harriet Veal

Harriet Veal

A/- Senior Town Planner

Postal Address: Level 2, 26 Reddacliff Street, Newstead QLD 4006

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