25 May 2026

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25/05/2026
APPLICATION REF
A006761597

Brisbane City Council
PO Box 1434
Brisbane QLD 4001

Attn: Kayal Chandrasekar

Via email: Kayal.Chandrasekar@brisbane.qld.gov.au

RE: A006761597/198 & 202 GARDNER ROAD, ROCHEDALE, 4123 - RESPONSE TO INFORMATION REQUEST

Application Details	
Applicant	Gardner Road Developments Pty Ltd C/- The Development Directive Pty Ltd
Land Owner	Gardner Road Developments Pty Ltd
Aplication Number	A006761597
Application Address	198 & 202 Gardner Road, Rochedale, 4123

Dear Kayal,

We write to you on behalf of Gardner Road Developments Pty Ltd (**the applicant**), and provide a full response to the Information Request issued by Brisbane City Council (**Council**) and dated 2 March 2026. This response is provided pursuant to section 13.2(a) of the Development Assessment Rules (**DA Rules**).

Each item from Council's Information Request has been outlined below along with the corresponding response. The applicant's response should be read in conjunction with the following supporting technical documentation:

- Attachment 0: Revised Reconfiguration Plans and Variation Plans, prepared by Therefor Group;
- Attachment 1: Housing Needs Assessment, prepared by Uplift Economics;
- Attachment 2: Landfill Gas Assessment, prepared by ADG Consulting;
- Attachment 3: SLR Technical Memorandum (Waterways), prepared by SLR Consulting;
- Attachment 4: Ecological Response including Tree Retention Plan and Concept Rehabilitation Plan, prepared by BAAM Ecology;
- Attachment 5: Revised Flood Impact Assessment, prepared by ADG Engineers
- Attachment 6: Revised Civil Engineering Plans, prepared by ADG Engineers
- Attachment 7: Access Location and Sightline Plans, prepared by Arcadis

We trust the provided information adequately addresses Council's Information Request. We advise that Council should proceed with their assessment of the subject development application in accordance with section 13.3 of the DA Rules.

If you have any questions regarding the attached material, please do not hesitate to contact the undersigned on 0452 226 254 or at Lachlan@developmentdirective.com.au.

Yours sincerely,

Lachlan Macgregor
Director
The Development Directive Pty Ltd

VARIATION REQUEST FOR RESIDENTIAL USE

1. *The changed proposal seeks to vary the zoning of the portion of land forming part of proposed Lots 13 and 14 to the Low-medium density residential zone. The proposal also seeks to vary the location and extent of the Waterway, Biodiversity and Flood overlays. The following items need to be addressed to progress the assessment of the variation request:*

Needs assessment

a. *Provide an economic report that includes a needs analysis that demonstrates there is a 'planning need' for the proposed Low-medium density residential zoned land and that the loss of the Business Park and Civic Gateway (NPP-003) precinct will not impact long term employment opportunities being provided in Rochedale in accordance with Overall outcome 3(d), 6(a), 6(b)(i) Rochedale urban community neighbourhood plan (RUCNP). Upon receipt if the needs report, a separate fee quote will be issued based on Development assessment and compliance fees schedule, for assessment of the report.*

Applicant Response:

Please find within Attachment 1 an economic report title "Rochdale Housing Need Assessment; Gardner Road, Rochdale' prepared by Uplift Economics dated 11 March 2026.

The report makes a number of key findings, including:

- Updated population forecasts, indicate the Rochedale area will require 4,730 new dwellings between 2021 and 2041. This is 1,804 more dwellings than Council planning (outlined in Council's LGIP) for the Rochedale area, indicating a significant shortfall between planned supply and actual supply in the Rochedale Housing Market.
- A conservative estimate of housing need indicates a shortfall of 192 dwellings in 2026 which is expected to grow to a shortfall of 952 dwellings by 2031. Without a significant and immediate increase in housing supply, house prices and rents in the Rochedale Housing Market will continue to escalate, housing and rental stress will worsen, and the community's access to secure, appropriate, and affordable housing will continue to deteriorate.

Accordingly, there is a significant shortfall in planned and actual supply of homes in Rochedale now and into the future, with this shortfall forecasted to get worse. There is a significant and clear community benefit and public interest outcome which would support the supply of further land for housing, beyond that currently zoned under the planning scheme.

Additionally, it is noted that the land at 37 – 109 School Road, Rochedale (98,050m^2) has been developed for the Brisbane Metro Depot Facility. The Brisbane Metro Depot Facility represents an commercial/industrial use, including a stabling and maintenance facility (transport depot), workshops (Low and Medium Impact Industry), driver amenities and administrative offices (office). The land is now zoned as SP3 Special Purpose (Transport Infrastructure).

Notwithstanding the strategic importance of the Brisbane Metro Depot Facility, the land was previous zoned in the Emerging Community Zone and identified in the NPP-005b Low density residential sub-precinct of the Rochedale Urban Community Neighbourhood Plan. This precinct is intended to be developed for residential development at a rate of 14 dwellings per ha. Based on the site area, the site could have been developed for approximately 140 dwellings. With the development of the Brisbane Metro Depot Facility, this residential land has been lost and it represents the removal of ~10ha of residential land which otherwise would have contributed to residential supply.

In relation to the loss of Business Park and Civic Gateway (NPP-003) land, it is noted that:

- The site adjoins land which has been approved by way of preliminary approval for medium density residential development, in accordance with A005747839. The site is otherwise bound by the mapped waterway. It aligns with good planning principles and orderly development for this land to be utilised for residential uses because:
    - For continuity and legibility of land use planning outcomes whereby the site is adjacent to the waterway and south of the central road is utilised for residential development. If the site was to be developed for industrial purposes, the approved residential land adjacent to the site would

become ‘an island’ of residential flanked by industrial development (and likely surrounded by large acoustic screens).

- To limit reverse amenity impacts between residential and industrial land uses. The ‘island’ of residential development has the potential to causes impacts ‘both ways’ in terms of amenity impacts on residents (flanked on two sides by industrial uses – if the site reverted to an industrial use) and operational constraints on industrial uses.
- If the site was to revert to an Industrial/commercial use, it will increase the viability of development for both sites through the need for acoustic walls, screening and management of air quality and noise impacts.
- To create a better public realm and interface along the waterway corridor, whereby residential homes will activate the waterway corridor more effectively, in comparison to an industrial or commercial building which will likely have a blank wall or loading facilities and car parking to the waterway;

For these reasons, the site is not an A-grade industrial site, which will be constrained in terms of operations through reverse amenity impacts. The use of the site for industrial will also cause detrimental impacts onto the existing residential development, such as increased acoustic treatment, air quality and potentially noise attenuation walls.

This context is important to establishing the need for industrial land in this location. In contrast to the overwhelming residential need for land in Rochedale, NPP-003 land has been slow to progress and be taken up. This represents the locational attributes of the NPP-003 land which is not premium industrial land, but rather its key purpose is providing a buffering/transitioning of uses between the Landfill and established residential areas. It is acknowledged that there is a demand for industrial land in Brisbane, however, this demand is in strategic industrial locations which have been located, zoned and preserved through the planning scheme, for example – the trade coast or south-west industrial corridor. This land is not in one of those locations, and therefore is less significant.

In this situation, it is our opinion that the planning and community need will be better served through the proposed development which seeks to replace NPP-003 land, which has not been taken up in Rochedale, with medium density land, which is in overwhelming need.

Finally, it is noted:

- There has been a net increase in employment land in Rochedale, as a result of the Brisbane Metro Depot Facility. Equally, there has been a net loss of residential land as a result of the same development;
- The application does not represent a loss to the planned extent of NPP-003 land. The planned extent was based on incorrect overlay mapping, whereby the land would have been considered constrained and not developable, for the purpose of forward planning for NPP-003 land. Accordingly, should this development application be approved, it will not result in a ‘loss of NPP-003’ land, but rather a gain of residential land in Rochedale.

Air quality and noise impacts

b. The site is located within the Industrial amenity investigation area sub-category of the Industrial amenity overlay. As compliance with the separation distances cannot be achieved as per PO2 and PO3 of the Industrial amenity overlay code, submit the following:

i. Submit an Air quality report prepared in accordance with the Air quality planning scheme policy to demonstrate compliance. When modelling for the air quality impacts, it must be for the future expansion of both the Austral Brick site and the Co-generation plants located at the adjacent landfill site. The modelling to consider Co-generation operation at the landfill site at 174 Gardner Road, Rochedale is slated for expansion and upgrades in the future. Odour must also be taken into account for the modelling.

ii. Submit further information demonstrating the proposed use can comply with the separation distances as prescribed in AO3 of the Industrial amenity overlay code. Where compliance with the separation distances cannot be achieved, submit for approval a Noise impact assessment report in accordance with PO3 of the Industrial amenity overlay code. Further guidance can be found in the Noise impact assessment planning scheme policy.

Applicant Response:

The Applicant is in the process of preparing a response to this item. However, as a result of a delay in receiving information from the Co-generation operator, this response has been deferred till after the public consultation period. As the impact of the co-generation plant onto the development will only impact this proposed development (and not the general public), it is considered that this information will not be relevant to the public, or prejudice its consideration of this development application.

Accordingly, the Applicant seeks not to respond to this item (now).

Landfill gas migration

c. *The site is in proximity of Rochedale landfill site, which may result in Landfill Gas Migration and Site Contamination. The development therefore needs to demonstrate that the proposal would not expose people to unacceptable levels of risk to health, safety and wellbeing from sub-surface landfill emissions, including landfill gas, contaminated groundwater or leachate.*

i. *Engage 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. 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-assessingsuitably-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 Suitably Qualified Person in accordance with the Environmental Protection Act 1994: https://aclca.com.au/qld/our-members-qld/*

ii. *Conduct a Preliminary Site Investigation in accordance with the National Environment Measure (Assessment of Site Contamination) Measure 1999 (as amended in 2013) (NEPM) including the following details:*

As part of the Preliminary Site Investigation, the SQP will include undertake historical aerial photography review for the Site and will confirm that 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, 2023 and 2025);

As part of the Preliminary Site Investigation, the SQP will also conduct a Landfill Gas Risk Assessment (LGRA), given the development site's proximity to the Rochedale Landfill Facility.

The Landfill Gas Risk Assessment will 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/corporatesite/resources/contaminatedland/19p2047-hazardous-groundgasesguidelines.pdf?la=en&hash=877EF007BFDEAF5163431351EB3C5A73FCBF7EFE)

Note: If the Preliminary Site Investigation identifies the potential for unacceptable levels of risk to health, safety and wellbeing from sub-surface landfill emissions (including landfil 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 many 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. A Preliminary Site Investigation Report is to be prepared and submitted to Council.

Note: 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. fromburied 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.*

Applicant Response:

Please find within Attachment 2 a Landfill Gas Migration Advice Letter prepared by ADG Consulting dated 21 April 2026.

The letter outlines historic reporting on the site and the surrounding sites and highlights the governing systems of the Rochedale Landfill site. The letter concludes that the sites have a very low (negligible) potential of being impacted by landfill gas or leachate migration from the BCC Rochedale Landfill and that further ground truthing is unnecessary.

WATERWAY CORRIDOR AND LGIP STORMWATER VALUES

2. *The submitted documentation does not provide detailed information required to demonstrate compliance with PO4, PO5, PO7, PO8 and PO9 of the Biodiversity areas overlay code, Overall outcome 3(h), PO2, PO4, PO5 of the Rochdale community neighbourhood Plan, PO1, PO2 and PO6 of the Waterway corridors overlay code, and PO19 of the Subdivision code. The fringe waterway corridor is to be located within Lot 500 and to be dedicated to Council. The fringe is to provide a buffer to the core waterway corridor and provide for maintenance access.*

a. *Provide a revised ROL plan that clearly shows the proposed core waterway corridor a minimum 60 metres wide and fringe corridor width of a minimum 10-metre on either side of the core waterway corridor, all located within proposed Lot 500.*
b. *Where proposed private lots share a boundary with the waterway corridor the full fringe must be provided to allow for a Council maintenance access, and the fringe must be free of any batters or retaining walls for private lots. Confirm that vehicle access can be achieved via the fringe waterway corridor and provide updated engineering drawings where required. Submit section plans showing the interface between all lots and the waterway corridor.*

Note: In terms of riparian waterway widths, please refer to QLD fisheries (Fish Habitat Buffer Zones, 2000) and other Australian sources that strongly corelate increased waterway widths with larger waterway health benefits. Waterway width should also have regard to stream order as a buffer width cannot be selected without reference to its location in the catchment and size of downslope connecting creek.

Applicant Response:

Please find within Attachment 3 a Technical Memorandum, prepared by SLR Consulting on the 15 May 2026 which provides a detailed response to this information request item. The Technical Memornadum provides:

- The proposed waterway corridor alignment has been derived having regard to stream order, catchment position, and the existing overland flow path established through the hydrologic and hydraulic modelling presented in the SLR Technical Memorandum lodged with the Development Application (dated 5 December 2025, ref: 635.000204.00001).
- Detailed responses to PO1, PO2 and PO6 of the Waterway Corridor Overlay Code are provided in Table 1 of the accompanying the attached Technical Memorandum.
- The proposed corridor provides a minimum width of 80m in the northern part of the waterway, comprising a 60m core corridor and 10m wide fringe in accordance with the planning scheme requirements. In the east-west tributary the waterway adopts a minimum width of 100m, comprising an 80m core waterway (40m either side of the centreline) and a 10m fringe on each side. This **exceeds** the minimum 60m core and 10m fringe requirement identified in Council's information request and the Rochedale Urban Community Neighbourhood Plan and results in an **increase** to total waterway area (in comparison to the current mapping).
- The realigned corridor will be located wholly within proposed Lot 500 and dedicated to Council. The fringe will be free of batters and retaining walls associated with adjoining private lots to enable continuous Council maintenance access. In particular, the Waterway fringe will adjoin and connect to the new District Road (approved by A005747839) providing direct vehicle access. Refer to comments regarding conditioning in response to Information Request Item 8, which ensures the construction of the District Road (and therefore waterway fringe access) prior to the creation of the proposed lots.
- A revised ROL plan, updated engineering drawings confirming vehicle/maintenance access via the fringe and bikepath accompany this response (discussed further below).
- A Rehabilitation Plan will be developed in due course (and can be conditioned) addressing fish passage and culvert design in accordance with the Accepted Development Requirements for Raising Waterway Barrier Works.

3. *The core waterway width is highly relevant to planned overall waterway health, water quality, fauna movement and biodiversity. The proposed mapped LGIP (Local Government Infrastructure Plan) waterway values are not determined as per existing waterway conditions (as assessed in the SLR waterway condition report), but post rehabilitation of the waterways corridor as part of LGIP requirements, as the waterway land dedication and works (rehabilitation) are part of LGIP item ROC-LA-002. Also, the proposal is to ensure that the varying of the trunk waterway corridor and overlays does not compromise the values of the ultimate LGIP waterway corridor on adjoining land parcels. Submit amended plans and documentation on how the proposed waterway will meet PO5, PO6, PO8 of the Stormwater code and the trunk stormwater requirements in the LGIP.*

Applicant Response:

Please find within Attachment 3 a Technical Memorandum, prepared by SLR Consulting on the 15 May 2026 which provides a detailed response to this information request item. Responses to PO5, PO6 and PO8 of the Stormwater Code (in Table 2), together with each element of the LGIP desired standard of service for the stormwater network, are addressed in detail in the accompanying SLR Technical Memorandum.

In summary, the proposed waterway corridor realignment aligns more closely with the existing overland flow path than the currently mapped Waterway Corridor Overlay, protects longitudinal and lateral hydrological connectivity, and contains the primary conveyance characteristics (flood extents, depths, velocities and shear stress) within the proposed corridor extents up to and including the 1% AEP event

— as demonstrated in Figure 5-1 and Appendix B of the SLR Technical Memorandum (5 December 2025, ref: 635.000204.00001). The realignment results in approximately 72 m² of additional waterway corridor area, providing an improved water quality outcome.

The corridor remains compatible with the LGIP trunk stormwater requirements (item ROC-LA-002) and the subsequent rehabilitation outcomes envisaged on adjoining land parcels.

Ecological Values

4. *The submitted 'Tree Plot' does not provide for the development impacts e.g. stormwater outlet, earthworks, works required for the fringe waterway corridor and the plan also did not identify tree numbers to correspond with the Tree Survey Data.*

a. *Submit a revised Vegetation Retention Plan in accordance with the Biodiversity Planning Scheme Policy including:*

i. *All trees 100 mm DBH or greater within the proposed development footprint/works area and within 6 m of proposed development footprint/works area.*
ii. *The proposed development plan (as an overlay) including all services/infrastructure/stormwater outlets and the full extent of all earthworks (cut/fill) required during construction of the development.*
iii. *A description of vegetation communities and species compositions for ground, shrub and subcanopy layers. Any species or vegetation communities of State / National significance to be clearly identified.*
iv. *A clear indication of which trees are to be retained, and which trees are to be removed, including the following information:*

- *Scientific name;*
- *Height;*
- *Diameter of tree trunk at breast height (DBH);*
- *Crown diameter;*
- *Habitat features including hollows and scratch marks, nests etc.*
- *Tree Protection Zones (TPZs) (in accordance with AS4970); and*
- *General health assessment.*
- *Associated tree numbers clearly shown on the plan.*

Applicant Response:

Please find within Attachment 4 a an updated tree plot and Vegetation Retention Plan prepared by BAAM Ecology.

b. *If works encroach into the TPZs of any trees identified to be retained, a report from a qualified arborist (AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.*

Applicant Response:

Please find within Attachment 4 a an updated tree plot and Vegetation Retention Plan prepared by BAAM Ecology. Where trees are impacted by earthworks they have been identifed for removal. No trees proposed to be retained will have works encroaching on their TPZs therefore a report from a qualified arborist is not necessary.

c. *Removal of native vegetation within the mapped Biodiversity areas overlay – high ecological significance strategic subcategory (HESS) will require environmental offsets in accordance with PO9 of the Biodiversity areas overlay code, the Environmental Offsets Act 2014 and the Offsets Planning Scheme Policy. Provide an Offset Impact Area plan that confirms total area to be offset for the removal of native vegetation within the mapped High Ecological Significance Strategic area.*

Applicant Response:

Please find within Attachment 4 a an Offset Impact Area plan prepared by BAAM Ecology. The plan confirms there will be removal of some isolated patches of native vegetation within the (currently mapped) HESS area. However, it is considered that the proposed rehabilitation will result in a significant increase to the HESS habitat values on the site and will provides an outcome greater than the 3-times offset multiplier prescribed in part 2.3.1 of the Brisbane City Council Offsets Planning Scheme Policy (SC6.22) and therefore no offset requirements will be required under future operational works.

d. *Fauna movement solutions proposed include shelves/ledges within existing culverts however no further information has been provided. Provide detail of fauna movement solutions to enable safe movement of fauna throughout the site and within the ecological corridor and are cognisant of engineering requirements (e.g. box culverts).*

Note: Development Approval A005747839 which requires a minimum 3600mm wide and 1800mm high box culvert for fauna movement and specifications as per DTMR Fauna Sensitive Transport Infrastructure Delivery manual.

Applicant Response:

This information request item is irrelevant to this this development application. The proposed road and abovementioned culverts have been assessed and will be developed in accordance with A005747839. That application has been approved and is subject to conditions including the requirement to provide a Wildlife Movement Management Plan as part of condition compliance assessment (condition 11). The design of culvert will also be assessed as part of a future operational works application which is related to A005747839.

Notwithstanding that this information request item is not relevant to this development application, the applicant would accept a condition similar to Condition 11 on A005747839 requiring the preparation of a

e. *The Concept Rehabilitation Plan states the planting strategy is introduce scattered plantings of water-tolerant native tree species spaced at 6-10m intervals. The waterway corridor must be fully rehabilitated with all strata to achieve compliance. Selective canopy tree species only is not supported. Maintenance access is to be provided via the fringe waterway corridor. Provide a revised Concept Rehabilitation Plan for the rehabilitation of the core waterway corridor:*

    i. *Inclusive of full strata plantings to the pre-clearance Regional Ecosystem at 1/10m2 for canopy species, 1/5m2 for shrub species and minimum 1/1m2 for groundcover species.*
    ii. *Proposed location and description of wildlife movement solutions (culverts, glider poles, koala refuge poles, fencing), lockrail/bollards, maintenance access.*

Applicant Response:

Please find within Attachment 4 an updated Concept Rehabilitation Plan prepared by BAAM Ecology which reflects a full strata planting and wildlife movement solutions for the waterway core corridor. This has been prepared in consultation with flooding engineer and waterway ecologist and reflects the mannings “roughness” co-efficient (0.15) applied to the waterway and the desired waterway outcomes (respectively).

FLOOD AND HYDROLOGICAL MODELLING

5. *While the proposal seeks realignment of the waterway corridor centreline, this varying of the trunk waterway corridor and overlays must not compromise the values of the ultimate LGIP waterway corridor on adjoining land parcels. Submit an amended layout and demonstrate how the development will not worsen flooding impacts and not compromise achieving an 80m waterway corridor width in accordance with LGIP requirements and as required by PO3 and PO10 of the Subdivision code.*

Applicant Response:

Please find within Attachment 5 an updated Flood Impact Assessment (**FIA**) prepared by ADG Engineers. Please also find within Attachment 6 an updated Civil Plans package prepared by ADG Engineers, which has slightly amended the design of the development pad. Refer to Figure 1 and 2 below.

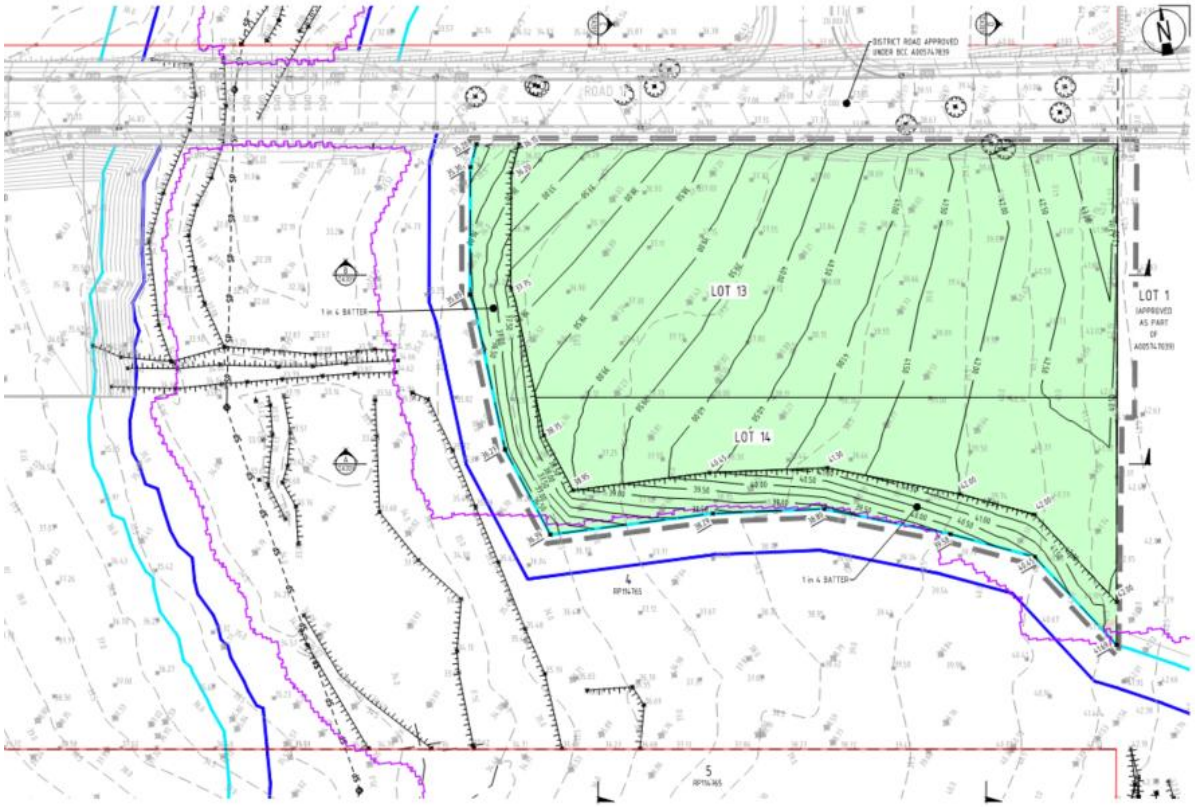

Figure 1: Development Pad as proposed at lodgement.

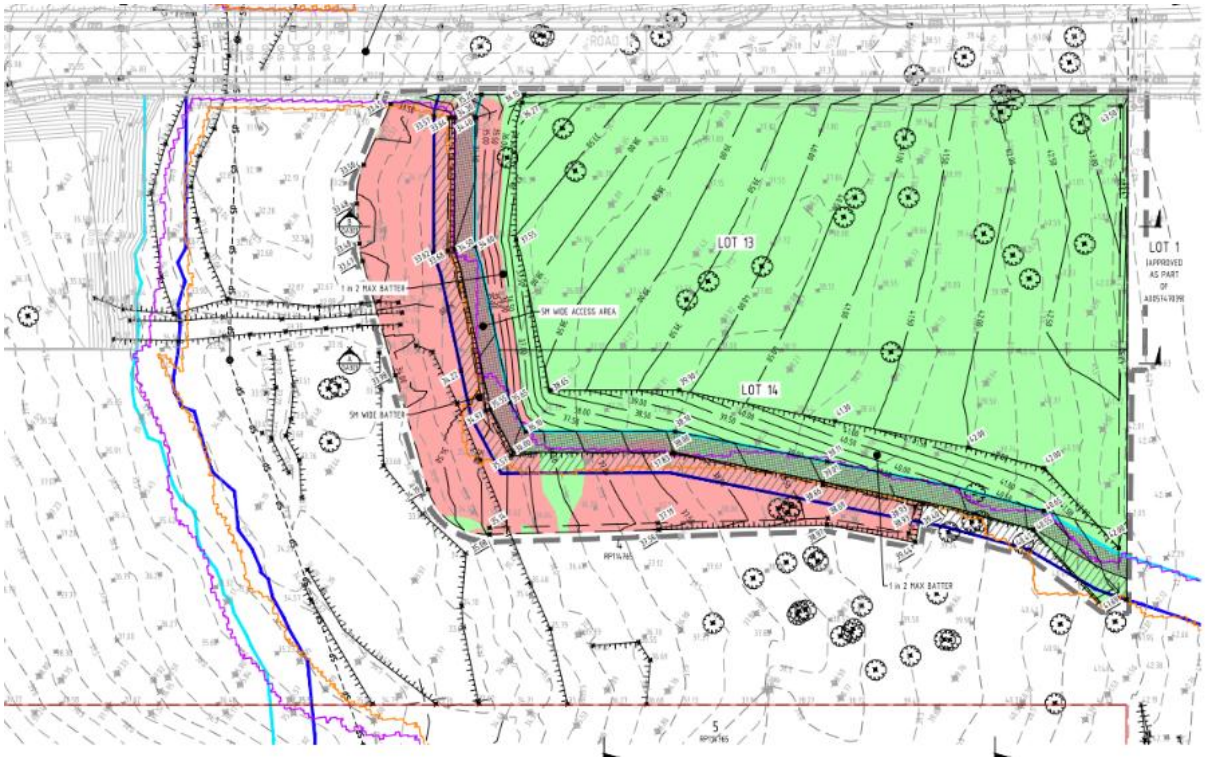

Figure 2: Development pad now proposed

Figure 3: Information Plan prepared by Therefor Group

The developable land as now proposed by the application has been reduced in size by crica 550m^2, as summarised in Table 1 below. Inversely the Waterway Lot has increased by +550m^2.

Table 1 – Summary of lot size changes between the proposal as lodged and now proposed

Lot	Size (as lodged)	Size (now proposed)	Difference
Developable Land			
13	9,613m^2	9,666m^2	+53m^2
14	4,830m^2	4,252m^2	-578m^2
905	3,978m^2	4,004m^2	+26m^2
906	12,736m^2	12, 736m^2	0m^2
Total	**31,157**m^2	**30,658**m^2	**-499**m^2
Waterway Lot			
800	**19,710 m^2**	**20,184m^2**	**+474m^2**

The reason for the revised design to the development lots (and resultant changes to lot size) is a result of a change to the flood modelling inputs (as compared to the approved FIA as part of A005747839). These changes include:

- To reflect revised rainfall data within the flood model (as compared to that which was relevant at the time A005747839 was approved); and
- an increased mannings roughness coeefieicnt (which has been increased from 0.1 under the approved FIA as part of A005747839 to 0.15 per the rehabilitation outcomes sought for the Waterway).

The resultant changes to the earthworks of the site include:

- "pulling back" of extent of filling to increase the waterway width; and
- Introducing an area of shallow cut at the junction of the waterways to assist the meandering of water around the bend of the waterway in flood events. This area of cut is very shallow (less than 500mm) and will be planted out in accordance with the proposed Concept Rehabilitation Plan.

Additionally, the Waterway Fringe has been reshaped to remove battering and to provide a finished surface level which is appropriate for the construction of the trunk bikeway, above the 39% AEP flood line.

The revised FIA shows no impacts, directly or indrectly off-site, but for some minor impacts downstream of the culverts. These impacts have been accepted as part of the approved FIA as part of A005747839, and are not considered to result in a "*material adverse impact*" pursuant to PO7 of the Flood Overlay Code, because:

- The flooding impacts are less than 10mm; and
- Are within 40m (eitherside) of the centreline (80m total) of a mapped waterway, in which development is already constrained by the Waterway Overlay code; and
- Is a result of introducing culverts which have already been approved as part of the road design under A005747839.

The revised civil plans and FIA have been developed and reviewed in conjunction with SLR Consulting (waterways, hydrology and geomorphology) and BAAM Ecology (including the Concept Rehabilitation Plan).

6. *The ADG and SLR flood reports have not demonstrated that the hydrology has assumed a fully developed upslope catchment (and developed site) with no stormwater detention for ultimate catchment characteristics to comply with PO1, PO2, PO4, PO4, PO5, PO7, PO11 and PO18 of the Flood overlay code (note the LGIP waterway ROC-LA-002 is to allow for this outcome).*

Applicant Response:

The ADG and SLR flood reports have assumed a fully developed upstream catchment with no detention. All results within the FIA reflect this assumption.

a. *Provide a Table with peak discharge assumed in the modelling at the culvert crossing for each AEP flood event modelled.*

Applicant Response:

Please find within Attachment 5 an updated FIA prepared by ADG Engineers which includes a table with peak discharge at the culvert crossing, at page 17.

b. *Provide flood hazard maps for 1% AEP event.*

Applicant Response:

Please find within Attachment 5 an updated FIA prepared by ADG Engineers which includes flood hazard maps for 1% AEP event.

c. *Submit model results as part of AR&R climate change SSP2-4.5 at 2100 as a separate model scenario and ensure the waterway width contains all flooding up to 0.2% AEP event. Any change to the overlays needs to apply current best practice as stated in AR&R, which would equally be applied to any new neighbourhood planning or overlay change proposed by Council.*

Applicant Response:

This request is irrelevant and has no planning purpose. There is no assessment benchmark within the planning scheme which calls for an analysis of the 0.2% AEP event. Notwithstanding, this information has been provided within the FIA within Attachment 5. This information is provided for information purposes only.

d. *Confirm the proposed District Road culverts can convey the 2% AEP flows (with climate change) through culverts and any overtopping of the District Road in a 0.2% AEP flood is safe with consideration to AR&R requirements, noting any vehicle washed of this road would enter high hazard flood conditions (which should be avoided).*

Applicant Response:

The District Road culverts can convey the 2% AEP flows through the culvert. The request in relation to the 0.2% AEP event is irrelevant and has no planning purpose. There is no assessment benchmark within the planning scheme which calls for an analysis of the 0.2% AEP event. Notwithstanding, this

information has been provided within the FIA within Attachment 5. This information is provided for information purposes only.

e. Manning's roughness coefficient values to reflect the required ecological outcomes *associated with waterway rehabilitation.*

Applicant Response:

Please find within Attachment 5 an updated FIA prepared by ADG Engineers. This FIA adopts a manning's roughness coefficient of 0.15 which has been increased from the approved FIA as part of A005747839 which adopted 0.10. This reflects the proposed planting schedule as outlined in the Concept Rehbailitation Plan.

STAGING

7. The proposal is reliant on an existing approval and several concurrent applications currently being assessed by Council including A006484551, A006738631 and A005747839. Submit further information and an updated structure plan detailing how this application will be staged/sequenced in consideration of the concurrent applications in accordance with PO19 of the Subdivision code.

Applicant Response:

This development application seeks a Preliminary Approval (variation request) – it does not authorise development to occur and therefore staging is not relevant to this component of the development application. Any future application will need to be assessed in accordance with relevant benchmarks which require the detailing of servicing and staging.

The development application includes a sub-division component which represents a management sub-division. In order for the 'management lots' to be serviced and to get access, it will be necessary for the development of 'the central leg' and 'southern leg' of the District Road, as approved/proposed under development applications A005747839 and A006738631 (respectively). Accordingly this development approval can be conditioned that the plan sealing of the management lots is not to occur until or at the same time, the District Road is dedicated in accordance with those approvals.

ROADWORKS & LOT ACCESS

8. Lots 905, 906, 13 and 14 and future drainage reserve lot 500 are dependent upon the construction and opening of the Farley Road extension to provide access.

Applicant Response

The development application includes a sub-division component which represents a management sub-division (to create Lots 905, 906, 13 and 14). In order for the 'management lots' to be serviced and to get access, it will be necessary for the development of 'the central leg' and 'southern leg' of the District Road, as approved/proposed under development applications A005747839 and A006738631 (respectively). Accordingly this development approval can be conditioned that the plan sealing of the management lots is not to occur until or at the same time, the District Road is dedicated in accordance with those approvals.

a. Demonstrate that access to each lot can be achieved from the new district access road, taking into account safe sight distances and level differences between lot and ultimate road design levels in accordance with PO1 of the Infrastructure design code and PO3 of the Subdivision code.

Note: The ROL plans must not provide or grant direct crossover vehicle access to Gardner Road for the western portion of lot 906.

Applicant Response:

Please find within Attachment 7 an Access Locations and Sightline Plan prepared by Arcadis which has been certified by an RPEQ. The Access Location and Sightline Plan demonstrating that access to each lot can be achieved from the new district access road, taking into account safe sight distances and level differences between lot and ultimate road design levels.

FUTURE TRUNK BIKEWAY

9. Demonstrate how the future trunk bikeway (ROC-SP-004) will link north to the new District Road (including appropriate sight distances) from the waterway to the south, considering the difference in the new road levels (crossing the waterway) and the waterway fringe where the bikeway will be linking to the east of the site, as per PO1 of the Infrastructure design code and PO9 and PO10 of the Subdivision code.

Applicant Response:

Please find within Attachment 6 an updated Civil Plans package prepared by ADG Engineers. The Waterway Fringe intersects with the District Road between road chainage 380.00, which has finished level of 34.90m. At the this junction, the Waterway fringe has a finished level of 34.50m AHD. Accordingly, the level difference between the Waterway Fringe (and trunk bikeway) is approximately 400mm. Accordingly, the trunk bikeway will be graded up to the road, without issue. Notably, the 'benched' area intended for the trunk bikeway is flood free, and therefore any filling in this location will not impact the FIA.

REFUSE COLLECTION

10. Provide amended plans and supporting documents to address refuse collection in relation to any proposed staging/sequencing of the development as per item 4 of this letter. Where the proposed sequence results in stub roads for the proposed future road connection, demonstrate temporary turn-around or easement must be provided in accordance with AO4.1/PO4, AO9/PO9 of the Subdivision code and AO8.1 and AO8.2/PO8 of the Infrastructure design code.

Applicant Response:

This development application seeks a Preliminary Approval (variation request) – it does not authorise development to occur and therefore staging is not relevant to this component of the development application. Any future application will need to be assessed in accordance with relevant benchmarks which require the detailing of servicing and staging.

The development application includes a sub-division component which represents a management sub-division. In order for the 'management lots' to be serviced and to get access, it will be necessary for the development of 'the central leg' and 'southern leg' of the District Road, as approved/proposed under development applications A005747839 and A006738631 (respectively).

Refuse collection will occur directly off the central District Road for management lots 13 and 14. There is no need for refuse turn-a-round as this is dealt with under A005747839 and A006738631. When Lots 13 and 14 are developed in the future, the development will be subject to a development application in which it will be necessary for that development to consider specific refuse requirements.

STREETSCAPE WORKS

11. A minimum verge width of 3.75 metres is required along Gardner Road in accordance with AO1/ PO1 of the Streetscape hierarchy overlay code. It is recommended that the verge be formalised and a pedestrian footpath be provided along Gardner Road to enhance accessibility and streetscape amenity. Provide amended plans, demonstrating the required 3.75m wide verge is achieved.

Applicant Response:

The required streetscape works have been addressed and approved under development application A00574839. Approved Plan PEA3402/2024 which was prepared by ADG clearly outlines the verge of 2.6m along the Gardner Road frontage that satisfies the Infrastructure Design Planning Scheme Policy (Section 3.7.3.2.5).

A pedestrian footpath is not required as the area is predominantly industrial. Additionally, there is no existing pedestrian footpaths within the vicinity of the development for a connection to be made. This is unlikely to change given the established nature of the landfill site to the north and Quarry to the east.