



Dedicated to a better Brisbane

4 March 2026

Banner Asset Management
C/- Urbis Ltd
Level 32, 300 George Street
BRISBANE CITY QLD 4000

ATTENTION: Michael Cattoni
Application Reference: A006928686
Address of Site: 47 LINKFIELD RD BALD HILLS QLD 4036

Dear Michael

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.

The proposal is inconsistent with the overall outcomes of the Bald Hills precinct within the Bracken Ridge and District Neighbourhood Plan, as it seeks urban development on unserviced land in Bald Hills while Key Resource Area (KRA) 59 and 60 remain identified in the State Planning Policy. In addition, issues relating to local infrastructure provision, flooding, and biodiversity have not been adequately addressed, and further information is required, including a comprehensive structure plan.

It is also noted that the site adjoins the state-controlled Linkfield Road and proposes a new access point. As the development application triggers referral to the State Assessment and Referral Agency (SARA), Council's assessment is contingent upon receipt of the relevant referral agency response to fully ascertain the impacts of the proposal.

Notwithstanding the matters outlined above, should the application proceed and the necessary structure planning assessment be undertaken, the following information will be required to substantiate the proposed land uses and subdivision application.

Structure planning assessment

1. The neighbourhood plan indicates only uses consistent with the Rural zone code should be considered appropriate until detailed precinct or master planning is undertaken for this locality. Broader strategic and infrastructure planning will be required through a full structure planning process before any development can proceed, to ensure that future industry land use can be properly serviced.

Submit a structure plan in accordance with the Structure planning planning scheme policy (PSP), noting a fee quote will be issued, to address the Overall outcomes 12a and 12b of the Bracken Ridge district neighbourhood plan code – Bald Hills precinct as per the below:

- a. *Areas of unserviced land in Bald Hills as indicated in Figure a do not accommodate urban development until such time as the Pine Rivers North and Pine Rivers South key resource areas (KRA 59 and KRA 60 respectively) are amended or deleted from the SPP.*
- b. *No development than otherwise permitted in the Rural zone will be supported until flooding impacts, local infrastructure provision and biodiversity issues have been sufficiently resolved through a comprehensive structure plan that addresses the following elements:*

- i. *provision of a road network that is interconnected with the established road hierarchy and minimises the number of vehicular entry points to Linkfield Connection Road and Gympie Road;*
Note—Refer to the Extractive resources overlay code for details of separation areas and buffers that apply to provide a suitable distance between incompatible uses to ameliorate impacts.
- ii. *provision of pedestrian and bicycle pathway connections to local destinations including the Bald Hills railway station to the north and recreation and sporting facilities to the east;*
- iii. *connection to the Cabbage Tree Creek sewerage catchment system using gravity feed without relying on pressurised sewer pipelines;*
- iv. *an interface between land to be developed and land to be conserved as open space that is delineated by a public road allowing for surveillance opportunities and enhanced public safety;*
- v. *development outcomes that are compatible with established uses and do not result in increased hazard risk;*
- vi. *provision of a corridor park along the South Pine River catchment that contributes to community life and identity with the provision of conveniently located active open space and recreation opportunities, including pedestrian paths and bikeways and that actively manages waterway corridors, wetlands and vegetation areas.*

Industrial land uses

2. The application is for all Medium impact A industry as well as Low impact industry and Warehouse uses. The application must detail which industries are proposed specifically within the categories applied for and identify the throughput for each proposed use.

This information is required as part of the planning assessment for the land use, and all proposed industries must be identified on plans. In addition, and to adequately assess emissions from the site, this information is necessary as a *basis for other reports* associated with the application such as air quality reports and noise reports. (Refer to the sections associated with air and noise impacts).

Reticulated water/sewer servicing

3. The site is currently not serviced by reticulated water or sewer and reticulated water/sewer servicing for the development has not been demonstrated. The concept servicing plan within the Engineering Report prepared by Accor outlines a strategy, however no evidence of consent/support from Urban Utilities (UU) has been provided.
 - a. Provide a UU service advice notice (SAN) or other written consent from UU for the strategy. Please note a contingency proposal of a private sewer raising main will not be supported against PO9 of the Infrastructure design code.

Stormwater management

4. The proposal is unclear in outlining if the flooded waterway (proposed lot 7) is proposed as drainage reserve to be dedicated to Council. The proposed subdivision plan does not indicate the lot will be dedicated, however the Stormwater Management Plan (SWMP) outlines this as the site's lawful point of discharge (LPD). Lot 7 would need to be dedicated to ensure this is an LPD.

- a. Clarify if lot 7 is proposed to be dedicated for drainage purposes. Revise the plan to clearly show the dedication.
 - b. The SWMP is to be revised providing an assessment in accordance with section 7.6 of the Infrastructure design planning scheme policy (PSP), demonstrating an LPD.
5. The proposed new road, with the sag arrangement, presents issues with overland flows (major flows/in the event of blockage) from the road reserve, creating adverse impact to properties at the sag. The provided SWMP proposes a 3.5m wide easement (EMT) within proposed lot 5 as a mitigation measure to this issue, which is not supported. An overland flow path within drainage reserve or road reserve is required to cater for the overland flows to the proposed drainage reserve lot 7. Additionally, access to the drainage area for maintenance is required to be demonstrated. The overland flow path within drainage reserve or road reserve will aid in meeting this requirement (as access from Linkfield Road appears not achievable).
 - a. Provide a revised proposal showing a cul-de-sac arrangement where major flows are directed to the drainage reserve (lot 7) via road reserve or drainage reserve and show provision for access maintenance. Provide calculations and details on the plans of the overland flow path width.
6. The proposed pipe size and swale width for the upslope property connection along the western boundary need to be clarified, with calculations provided and dimensions shown on the plan of the proposed upslope connection/swale. Additionally, comment on the major flow path from the upslope property is required from a Registered Professional Engineering Queensland (RPEQ) in the event the swale/pits are blocked. It appears the proposed retaining wall along the western boundary will direct flows to the northern property (creating adverse impacts).
7. The concept SW plan within Appendix G of the SWMP proposes a drainage arrangement which does not align with Council Infrastructure design PSP chapter 7; a gully to gully stormwater system is proposed on both sides of the new road, however road gully pits are not detailed to be in accordance with Council standards (BSD-8051).
 - a. The concept SW plan is to be revised to demonstrate compliance with the Infrastructure design PSP, including a standard herringbone drainage arrangement.

Flood impacts

8. The site is affected by overland flow and creek/waterway Flood Planning Areas 1,2,3,4 and 5. The proposal's supporting documentation is relying on the previous development approval's flood report of A006105836 which was prepared for a service station use.
 - a. Provide a revised/amended flood report for the uses proposed by this application (Low impact industry, Medium impact industry – A, and Warehouse). Noting the requirement for flood risk assessment as per AO3 of the Flood overlay code for the new uses proposed. The amended report is required to provide a flood risk assessment for these uses as per PO3/table 8.2.11.3.C of the Flood overlay code, demonstrating the uses are compatible with the flood hazard.

New road

9. The proposed interim turn around for the new industrial road over the verge area and partial easement area over the forecourt of proposed Lot 5 is required to be amended. The resultant outcome of the arrangement of the large-width crossover sees the verge/footpath area being utilised for turnaround. This arrangement conflicts with the proposed access/servicing manoeuvring of the proposed use on Lot 5. A turnaround provision for the articulated vehicle (AV) is to be provided wholly within the carriageway or an easement (EMT) arrangement wholly on the site which does not impact the safety/operation a standard verge area. Lot 5 is to be sterilised from use with an EMT over the whole lot, a suitable/safe turnaround provided wholly on the lot until such time the proposed road is extended.
 - a. Provide a revised proposal, including an updated traffic report and plans which adequately addresses the Subdivision code AO9 and Transport, access, parking and servicing (TAPS) code PO3.

10. The Civil Services Preliminary General Layout Arrangement Plan SK01-0002 Issue A provided within the Engineering Services Report does not detail the proposed road reserve width, including the carriage way width, verge width or footpaths on the verge.

- a. Provide amended plan/s as per BSD-1021 and addressing the Infrastructure design code PO1.

Access to proposed Lot 4

11. The proposal is to be revised to provide a single access to proposed Lot 4 to address TAPS code AO9.2/PO9. The comments within the traffic report outlining the proposed use on the site (workstore/mancave) demands two crossover does not provide sufficient justification.

- a. Provide Registered Professional Engineer Queensland (RPEQ) justification to address the safety/operation concerns that the two cross-over (one-way internal aisle) arrangement presents (potential for vehicles to enter or exit the site via the wrong crossover, creating adverse impact to the road network. Provide an amend traffic report and plans addressing this issue.

Parking provisions

12. The proposal seeks a significant performance outcome for car parking provisions for Lot 4, which has a proposed GFA of 2102m² (30 spaces proposed where TAPS code requires 54 spaces). Furthermore, the proposed car parking spaces located in the front of the roller doors to each tenancy is not supported as it will further impact on the availability of parking during periods when access to the roller doors is required. It is recommended that the proposed GFA and/or number of tenancies be reduced to ensure compliant car parking can be provided.

- a. Provide amended plans and documents to demonstrate the development provides a sufficient number of parking spaces to accommodate design peak parking demands without overflow parking to an adjoining premises or streets in accordance with Industry code PO6 and TAPS code PO13.
- b. Demonstrate car parking spaces remain clear of roller doors to allow unobstructed access for servicing to occur within units and not within the circulation aisles.

Servicing – Lot 4 and 5

13. The RPEQ prepared swept path plans indicate the light rigid vehicle (LRV) manoeuvring for Lot 5 will utilise the verge area for the entry manoeuvre and conflict with the proposed interim AV turn around provision. The service vehicle manoeuvring is to be wholly contained with the site.

- a. Submit a revised RPEQ swept path plan with a revised arrangement in accordance with TAPS code PO15.

14. The proposal over on Lot 4 seeks a performance solution for regular servicing via a van, however the traffic report or plans do not detail a dedicated van service bay or detail where van servicing will occur. Clarify this within a revised traffic report/revised plans.

Filling and excavation

15. The provided concept earthworks plan SK01-0001 Issue A within the Engineering Services Report is to be revised to address the other items of this information request, and the below items are to be addressed to satisfy the requirements City Plan 2014:

- a. Filling and excavation code AO1/A02.1 - Detail the retaining wall heights and provide section plans through the site showing level details.

- b. Subdivision code PO9a - The concept earthworks plan is proposing a retaining wall within road reserve (at the northern boundary) to be a Council asset. Retaining walls within road reserve are not supported and this should be amended to a suitable batter for ease of maintenance. Provide a revised arrangement.
- c. Waterway corridor overlay code AO7 - From Nearmap imagery it appears some filling has occurred within the waterway corridor on the site. Clarify this on the earthworks plan by showing the location of the waterway corridor and the fill (existing on the site). As per previous applications on the site, earthworks within the flooded waterway are not supported.

Refuse storage

16. In accordance with PO16/AO16.2 of the Industry code, provide amended plans to demonstrate the size and area of the refuse storage area for each lot in accordance with the following requirements:

- Lot 1: 12.9m² - 3,000mm x 4,300mm
- Lot 2: 12.9m² - 3,000mm x 4,300mm
- Lot 3 / T3: 12.9m² - 3,000mm x 4,300mm
- Lot 3 / T4: 12.9m² - 3,000mm x 4,300mm
- Lot 4: 11.31m² - 2,900mm x 3,900mm
- Lot 5: 17.61m² - 3,900mm x 4,400mm

17. When submitting amended plans for the new road design, ensure a suitable turn-around area is provided for refuse collection vehicles, in accordance with Subdivision Code AO9c.

Firefighting protection

18. Fire protection coverage for the proposal within 90m distance from the future building envelope to a fire hydrant or private fire hydrant has not been demonstrated as required by PO9/AO23.1 of the Infrastructure design code.

- a. Submit a firefighting coverage plan to demonstrate that any part of a future building resulting from the creation of a standard format subdivision will be located no more than 90metres from a UU fire hydrant or private fire hydrant.
- b. Fire-fighting coverage measurement is to be from the hydrant along the street to avoid obstructions, including fences, private property, and other buildings to the property entrance and around the perimeter of the future building or lot (to the furthest most corner).

Ecological overlay encroachment

19. The Ecological Assessment Letter submitted to support the application indicates approximately 200m² of encroachment into the Waterway corridor and Biodiversity areas overlays as a result of the proposed development. However, the submitted plan set does not identify the applicable overlays or show the areas of encroachment.

- a. Provide amended plans which clearly demonstrate the location and extent of all encroachments into the Biodiversity areas and Waterway corridor overlays.

Rehabilitation

20. The proposal seeks to encroach into the Local sub-category of the Waterway corridor overlay and the High Ecological Significance Strategic (HESS) sub-category of the Biodiversity areas

overlay. Aerial imagery also identifies approx. 635m² of fill stockpiles are located within the mapped waterway corridor. Development within these overlays must protect and enhance areas of strategic biodiversity value, riparian vegetation and waterways, provide environmental connectivity along the waterway and maintain natural flow conditions. To demonstrate compliance with PO1 and PO6 of the Waterway corridors overlay code and PO3 and PO4 of the Biodiversity areas overlay code, a Concept Rehabilitation Plan is required. All existing fill stockpiles must also be fully removed from the mapped waterway corridor.

- a. Provide a Concept Rehabilitation Plan. This plan is to be in the form of scaled plans and supporting documentation and must include:
 - i. Description of proposed rehabilitation, including earthworks, methods, objectives.
 - ii. Any remediation measures required to ensure complete removal of all fill stockpiles from within the waterway corridor.
 - iii. Details of the proposed rehabilitation schedule, including staging, plant species names, stock size, quantities, densities, locations.
 - iv. A detailed 24-month maintenance program for all rehabilitation works.
 - v. Stabilisation methods for all areas of exposed soil surface.
 - vi. Specification notes on weed treatment and management, planting methods, mulching and soil preparation.

Noise emissions

21. The combined Air Quality and Noise Report by Assured Environmental dated 16/12/25 R2 has been reviewed and there are matters in the report that must be further addressed to complete the assessment. Provide a revised report that focuses only on noise emissions (not combined with air quality matters). *Once the proposed industrial land uses have been identified* (see above), the following information is required:
 - a. Given Table 17 of the report and the types of industries applied for, the report does not include a comprehensive assessment of all noise sources. Therefore, assess all noise source emissions that are associated with the industries applied for, and ensure that at least power tool usage, pallet drops/indoor warehouse activities and all other noise sources are taken into account.
 - b. Correct the Emerging Community zone criteria for the nighttime period which is 45dB(A). It is acknowledged that Table 18 is not affected by the correction as a lower criterion has been used in Table 18.
 - c. A worst-case scenario for truck pass-by noise has not been used in Table 17 and the source level must be described with the distance the source is measured at, e.g.) 1m.
 - d. The performance outcome must be addressed in full, as AO2.4 of the Industry code does not apply to the application. Therefore, all noise sources must be addressed for the proposed time frames and durations. This includes assessing deliveries to and from the site during all time frames including the day and evening.
22. In addition, Figure 8 “Noise Source Location” does not include all areas and noise sources at the whole site indoors/outdoors.
 - a. Revise Table 17 and Pg. 36 of the report, for the hours AM/PM, as there appears to be an error with the hours.

- b. Support all impacts with a table which identifies how the assumptions about the impacts have been made for all receivers marked in the report R1 – R10.

Air quality

23. The combined Air Quality and Noise Report prepared by Assured Environmental (dated 16/12/25, Revision 2) has been reviewed. Based on the separation distances between the proposed tenancies and nearby sensitive uses/zones, speculative Medium impact industry (B) uses cannot be supported within any of the proposed tenancies. Speculative Medium impact industry (A) uses may be supported in all tenancies except Tenancy T1. Low impact industry and Warehouse uses can be supported across all tenancies. Should the use be sought for a Medium impact industry (A) use within Tenancy T1 and/or a Medium impact industry (B) use within any of the proposed tenancies, detailed information on the specific industry use(s) would be required to enable assessment against PO1 of the Industry code. *Note: This advice relates solely to air quality impacts. Some uses that may be acceptable from an air quality perspective may not be supported due to potential noise impacts.*

Airport environs overlay

24. The site is located within the Airport environs overlay and is undertaking activities (air emissions and potential hazards) that may impact on the safe operation of the Brisbane Airport. *Once the proposed industrial land uses have been identified* (see above), the following information is required:
 - a. Address the provisions contained in AO1 – AO2 of the Airport environs overlay code. Where compliance with the Acceptable Outcomes cannot be achieved, compliance with PO1-PO2 is required and may include the provision of an Air Quality/Safety Report and/or assurance from Brisbane Airport Corporation (BAC) and/or the Civil Aviation Safety Authority CASA.
 - b. Therefore, provide a direct response to the outcomes as part of a response to the request for information, and adhere to the following procedure relating to the Brisbane Airport:
 - i. Where compliance with AO2 will not be achieved, compliance with PO2 is required which includes assurance from Brisbane Airport Corporation and the Civil Aviation Safety Authority (CASA). Complete and submit the Form 1247 to CASA and the filled-out form and outcome of the plume rise assessment by CASA are to be submitted to Council.

Stormwater quality

25. The stormwater quality section of the Stormwater Management Report by Acor dated 18/12/25 Rev 2 must be supported with the digital MUSIC file and a clearer figure which details the treatment train. A separate drainage plan must also be submitted which reflects the report and digital file.

Acid Sulphate Soils

26. The site is located within the Potential and actual acid sulfate soils overlay. The applicant therefore needs to demonstrate that the site is not affected by, or will not disturb, actual or potential acid sulfate soils.
 - a. Submit information on whether the development includes soil disturbance at or below 5m AHD and involving i) excavating or removing equal to or greater than 100m³ of soil; or ii) soil disturbance (including filling) greater than 500m³; or iii) filling equal to or greater than 0.5m average depth.

Where the above soil disturbance is involved, provide an Acid Sulfate Soils (ASS) Investigation Report and Management Plan prepared by an appropriately qualified and experienced person, and prepared in accordance with relevant policies/guidance materials and technical guidelines/manuals such as:

- State Planning Policy and SPP Guidance Materials;
- Queensland Acid Sulfate Soil Guidelines: sampling guidelines; laboratory methods guidelines/manuals; and
- Queensland Acid Sulfate Soil Technical Manual: Soil Management Guidelines.

Dangerous goods storage

27. Dangerous goods storage must be in accordance with the Flood overlay code, therefore address AO/PO16 of the code. *Once the proposed industrial land uses have been identified* (see above), the code can be assessed and responded to.

Building setback to Linkfield Road

28. T1 Building 1 on proposed Lot 1 is provided with a 3.0m front setback, where 6m is required.

- a. Provide amended proposal plans which demonstrate the required front setback in accordance with the Industry code AO12.3/PO12.

Pedestrian and cyclist access, staff amenities

29. The development is required to provide staff recreation areas and end-of-trip facilities to each tenancy, as well as secure and convenient bicycle parking. Safe pedestrian and cyclist access to the site is also required to be demonstrated, which is separate from vehicles.

- a. Provide amended plans to provide the required staff recreation areas, bicycle parking, showers and change rooms, lockers, and pedestrian/cyclist access, in accordance with AO14/PO14 of the Industry code, AO5.1/PO5/AO7/PO7/PO8 of the TAPS code, Table 21 of the TAPS PSP.

Landscaping

30. The submitted plans identify structures to the site frontage however the plans do not indicate the provision of sufficient landscaping to ameliorate the view of these buildings from the street. Council is concerned that the proposed buildings will dominate the view of the development from the street.

- a. Submit a landscape concept plan, prepared by a suitably qualified landscape architect, providing the following detail:
 - i. A minimum 3m wide landscape strip to the length of the site frontage planted with large shade trees to ameliorate the view of the development from the road, in accordance with PO13 of the Industry code.
 - ii. Elevations of the site frontage and the buildings to demonstrate the building height above the existing boundary wall.
 - iii. Provide landscape buffering along boundaries shared with neighbouring residential uses to the north.
 - iv. Include a planting palette identifying proposed species of trees, shrubs and groundcovers. Where plant forms or species are proposed as a feature for a particular area (e.g. deep planting, buffer planting) identify the proposed locations in the planting palette.
 - v. Proposed landscaping character and/or materials should be specified where possible providing detail of the proposed for assessment that addresses deep planting and landscaping requirements.

Proposed impact to approved outcomes of Service station approval A006105836

31. The proposal impacts on the following outcomes of the development approval on the site: stormwater (swale outcome along the northern boundary), access (access

location/arrangement on Linkfield Road) and the onsite wastewater treatment outcome (treatment area). Council notes a modification to the existing approval may be required for assessment of any changes to the existing approval.

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

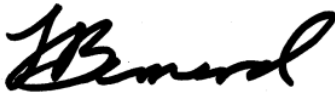
Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

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 quoting the application reference number A006928686.

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

Yours sincerely



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Development Services
Brisbane City Council