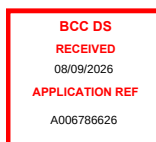


Our ref: 12074
Council ref: A006786626

7 September 2026



Attention: Katrina Bogoevski
Brisbane City Council
GPO Box 1434
Brisbane QLD 4000

Via email: katrina.bogoevski@brisbane.qld.gov.au

Dear Katrina,

**RE: RESPONSE TO FURTHER ADVICE
318 MILES PLATTING ROAD, ROCHEDALE QUEENSLAND 4123**

We act on behalf of Verso 318 Pty Ltd, the Applicant in relation to a Development Application lodged with Brisbane under the *Planning Act 2016* (the Planning Act) over the above land originally seeking:

- Preliminary Approval to vary the effect of the Brisbane City Plan 2014 v32 (Planning Scheme), including a Variation Approval for Centre Activities (Defined Activity Group), Multiple dwelling, Rooming accommodation, Hotel and Bar.

On 3 July 2026 we received correspondence from Brisbane that was taken to be Further Advice under section 35 of the *Development Assessment Rules* (DA Rules). We now provide a response to the matters raised in Council's further advice.

In support of our response, we provide the following attachments:

Appendix A	Precinct Plan, prepared by DKO;
Appendix B	Needs Assessment, prepared by Foresight Partners;
Appendix C	Traffic Response, prepared by Colliers
Appendix D	Bushfire Risk Assessment, prepared by Queensland Bushfire Risk Assessments;
Appendix E	Draft Conditions, prepared by Saunders Havill

Proposed Amendments

The proposed development has been amended to incorporate changes in response to Council's Further Advice. The proposed development now seeks approval for the following uses:

- Preliminary Approval to vary the effect of the Brisbane City Plan 2014 v32 (Planning Scheme), including a Variation Approval for Childcare centre, Food and drink outlet, Health care service, Indoor sport and recreation, Multiple dwelling, Office, Shop and Short-term accommodation

We note that the above changes have been made in response to Council's Further Advice. In accordance with section 26 of the DA Rules, the development assessment process does not stop where the change is in response to a Further Advice provided by an assessing authority about the application.



Further Advice Response

A response to matters raised in Council's Further Advice is provided below.

Uses and Height

- 1) *It is acknowledged that the amended proposal has significantly reduced the non-residential components and increased residential land uses in response to the traffic and road capacity issues. However, the proposed land use mix does not meet the intent for the Specialised centre (Mixed industry and business) zone and the Gateway business precinct (NPP-003) of the Eight Mile Plains gateway neighbourhood plan. The precinct seeks to support employment generating activities (industrial and business uses supported by office activities, small scale food and drink outlets, service industry, Indoor sport and recreation, small scale shop and educational establishment uses etc.), set in a business park environment.*
- a) *While a predominantly residential proposal may be considered, provide a mix of uses that are more in line with those envisaged within the neighbourhood plan and zone (i.e. indoor sport and recreation uses, educational establishment, community use where a maximum of 1,000m², and office etc.) while ensuring road capacity and functioning of the local road network is maintained. Demonstrate how the specific mix or type of activities is provided in an integrated and co-located manner to maximise site multi-functionality and efficiency of the use of land in accordance with OO2a of the Specialised centre code.*

Response:

As requested by Council, the proposal has been revised to provide a more balanced mixed-use outcome comprising residential accommodation, short-term accommodation, childcare, office, shop, food and drink outlet uses, communal open space and supporting access infrastructure.

The non-residential components remain an important part of the development and are intended to support residents, workers, visitors and the broader employment precinct – while ensuring that they do not undermine the role, function or viability of the Rochedale Town Centre.

As outlined in the amended Traffic Engineering Report, traffic modelling for the future development has been undertaken on the assumption that the following minimum non-residential uses will be provided as part of the future development over the site:

- Shop - 400m² gross floor area (GFA);
- Food & Drink Outlet - 300m² GFA;
- Childcare Centre - 70 placements;
- Short-Term Accommodation (STA) Facility - 76 bedrooms;
- Office - 500m² GFA.

The proposed retail uses are limited in scale and are intended to perform a convenience and local service function, rather than establish a competing centre. The childcare centre, office and short-term accommodation components also provide employment-generating and community-supporting activities consistent with the broader intent for a business park environment. These uses are co-located with the residential component to maximise site efficiency, internal capture and multi-functionality, and to create an activated mixed-use precinct rather than a stand-alone residential development.

The above minimum requirements may be conditioned by Council as part of the approval.

- b) *Where the development is not for purposes anticipated in the zone precinct, such as residential, demonstrate how the proposal provides quality design and integration with the*



surrounding area, and offers compensatory community benefits in accordance with OO2c of the Specialised centre code.

Response:

The proposal provides a high-quality, integrated master planned outcome that is responsive to its location, site constraints and the surrounding development context. The development has been structured around a clear internal movement network, activated edges, communal open space and a mix of uses that support daily needs and improve the functionality of the site. The inclusion of residential uses supports housing choice in a well-connected location close to employment, services and high-frequency public transport infrastructure.

The proposal also provides compensatory community benefits, including improved local access to convenience retail and food and drink services, a new childcare centre, additional visitor accommodation in an area with limited supply, ongoing employment through the non-residential components and construction phase employment. Importantly, the development will also deliver a privately owned, publicly accessible village green, providing a high-quality landscaped focal point for residents, workers, visitors and the broader community. This space will improve local recreation and gathering opportunities, support activation of the mixed-use precinct and contribute to a more legible and community-oriented public realm.

The amended built form response reduces intensity towards the rear of the site and provides a more appropriate transition to adjoining sensitive interfaces and bushfire hazard areas. On this basis, the proposal satisfies the intent of OO2(c) by delivering a coordinated mixed-use outcome with community benefits that offset the introduction of uses not otherwise anticipated as core uses in the precinct.

c) Provide justification to demonstrate that the proposed land use mix (particularly residential) would not undermine the potential of the Specialised centre (mixed industry and business) zone to continue to cater for future demand for the intended employment generating activities.

Response:

An Economic Need and Impact Assessment has been prepared to specifically address whether the proposed land use mix would undermine the ongoing employment-generating function of the Specialised Centre zone (refer to **Appendix B**). That assessment confirms that the subject site represents only a small proportion of the broader Specialised Centre and Business Park/Gateway Civic Precinct employment land supply within the Rochedale-Burbank SA2. Even with the proposed development proceeding, substantial undeveloped employment land remains available in the surrounding precinct to accommodate future commercial, business and industrial uses.

The assessment identifies residual employment capacity of approximately 5,978 employees across the Specialised Centre zone and Business Park/Gateway Civic Precinct, excluding the subject site. This capacity is significantly greater than the projected commercial and industrial employment demand identified for the area to 2041. The proposed non-residential components will also generate ongoing employment on the subject site and the future resident population will provide a local labour pool and customer base to support nearby business, commercial and service uses. Accordingly, the proposal will not prejudice the capacity of the zone or precinct to cater for future employment-generating activities.

d) Where Centre Activities beyond those anticipated by the Specialised centre zone are proposed, assess the need for these uses and their likely economic impacts on the nearby Rochedale Urban community Town centre precinct, assuming the maximum GFA allowed by the proposed



Response:

The Economic Need and Impact Assessment in **Appendix B** also considers the need for the proposed centre activities and their likely economic impacts on nearby centres, including the Rochedale Town Centre and the proposed mixed-use development at 400 Miles Platting Road. The assessment identifies a substantial undersupply of retail floorspace within the main trade area, including both total retail floorspace and food catering floorspace. The proposed shop and food and drink outlet components are modest in scale, comprising 400m² and 300m² respectively, and would represent only a small proportion of forecast demand.

The assessment concludes that the proposed centre activities are supportable and would not undermine the role, function or viability of the Rochedale Town Centre or other nearby centres. Forecast impacts are well below levels typically regarded as problematic in retail economic impact assessments and will be further moderated by ongoing population and workforce growth in the catchment. The proposed centre activities therefore respond to demonstrated local need while maintaining the integrity of the existing and planned centre network.

- 2) *Provide amended plans reducing the proposed height across the site to a maximum of 10 storeys. The height of the development has increased from that initially proposed and is to be reduced to ensure limited overshadowing to the adjoining sensitive use to the east. The lower density heights proposed at the rear of site in the bushfire hazard area is supported.*

Response:

Amended plans have been prepared which reduce the maximum building height across the site to 10 storeys. The revised precinct plan identifies a maximum height of 10 storeys in the most appropriate parts of the site and provides lower-scale built form towards the rear of the site. This responds to Council's concern regarding the previously proposed height and provides a more appropriate transition to adjoining sensitive uses to the east.

Zoning

- 3) *Provide an amended zoning plan with precincts (including areas in m²). The plan is to delineate the zoning proposed for the site, in line with the zones of the City Plan 2014 to ensure future assessment is conducted with the current planning scheme at the time of lodgement.*
- a) Clarify what is anticipated in the amenities use area on the current uses plan.*
 - b) Where necessary overlays like active frontages may be utilised to ensure an appropriate outcome is provided along the ground floors of the development proposed on the active edges plan.*

Response:

An amended precinct plan has been provided in **Appendix A**. The plan identifies the proposed precincts and intended development outcomes across the site, including the location of residential, short-term accommodation, retail and mixed-use development as well as the location of the village green. The precinct plan is intended to provide a clear framework for future development applications while recognising that the detailed built form, tenancy layout, parking, servicing, landscaping and architectural design will be resolved through later approval stages.



In relation to the 'amenities' area shown on the previous plans, this was intended to accommodate the communal open space areas associated with the Multiple Dwelling located along the Miles Platting Road frontage. As identified on the proposed Precinct Plan, the future building within Precinct 1 will instead provide a mixed-use development outcome with commercial/retail uses on the ground floor level (with an active frontage to Miles Platting Road) and a multiple dwelling above.

Active frontages have also been identified on the Precinct Plan to ensure that key ground floor edges deliver an activated and outward-facing interface, including opportunities for non-residential, lobby, communal, retail, food and drink or other publicly engaging uses, where appropriate.

A specific 'zoning plan' hasn't been provided for the development as the future uses can be appropriately managed through conditioning (refer to the draft conditions in **Appendix E**). However, if Council's preference is to control future development through the approval of 'zones' and allow the categories of development and assessment under the planning to regulate development within these zones, the applicant is supportive of this outcome and is willing to discuss this further with Council.

- 4) *Demonstrate on the plan the proposed precincts and/or how the staging of the development is going to be delivered, noting that the development is limited by the traffic capacity on Miles Platting Road. Provide key development milestones that are linked to the staging of the development, including the staged access to the site.*

Response:

The staging of the development has been linked to the progressive delivery of access and road network infrastructure as follows:

- Stage 1 access is proposed via a left-in, left-out site access intersection on Miles Platting Road, consistent with previous planning approvals and existing interim arrangements.
- Stage 2 access is contingent on the partial carriageway duplication of Miles Platting Road, and the signalisation of the Miles Platting Road / School Road intersection, should BCC's planned upgrades not be delivered within the rescheduled timeframe.
- The ultimate access arrangements provide a new northern approach via the Miles Platting Road / School Road signalised intersection, with site access intersection to the west of School Road retained (albeit restricted to left-in at BCC's request) to maintain adequate network capacity, redundancy, and routing flexibility.

This approach ensures that each development stage is matched to the capacity and function of the surrounding road network at the relevant time. The amended transport material confirms that the interim, Stage 2 and ultimate access arrangements can operate satisfactorily subject to the identified staged infrastructure and road network upgrades. The proposed development milestones will therefore be tied to the delivery of the relevant access arrangement, ensuring that traffic capacity on Miles Platting Road is appropriately managed throughout the life of the master plan.

For conditioning purposes, we would recommend that the following condition be applied to the approval:

Vehicular Access (external)

As part of any subsequent Development application/s for a Development Permit, submit to Development Services a Traffic Impact Assessment (TIA), certified by a suitably qualified Registered Professional Engineer of Queensland (RPEQ) which assesses the application against the relevant



provision of the Brisbane City Plan 2014 as amended from time to time, and demonstrates that the proposed development yield, land use mix and traffic generation can be safely and efficiently accommodated by the interim or ultimate access arrangements and surrounding road network, in accordance with the approved drawings/documents.

The TIA must have regard to the approved traffic assessment and the indicative traffic generation thresholds and access arrangements identified for the site in the approved 'Updated Transport Engineering Report – Development Application Submission' prepared by Colliers and dated 01/09/2026, including:

- *Stage 1 – Interim Access 1*
 - *Access via left in, left out site access intersection on Miles Platting Road.*
- *Stage 2 – Interim Access 2*
 - *Partial carriageway duplication and signalisation of the Miles Platting Road / School Road intersection, with the existing site access (Stage 1 access) retained as left-in / left-out.*
- *Stage 3 – Ultimate Access*
 - *Access to the site via a new northern approach to the Miles Platting Road / School Road signalised intersection, with the existing site access (Stage 1 access) retained as left-in*

The nominated dwelling, bedroom and land use yields are not fixed development caps. They are indicative traffic generation assumptions used to inform the staged access strategy. Alternative land use mixes, yields or staging arrangements may be approved where an updated TIA demonstrates that the traffic generation and distribution can be accommodated by the applicable access arrangement and surrounding road network, with any necessary access, intersection or external road upgrades delivered prior to commencement of the relevant use.

Note: For the avoidance of doubt, the staging thresholds referenced above are intended to manage traffic generation and infrastructure timing only. They do not limit the ultimate development yield where further traffic assessment demonstrates equivalent or acceptable traffic outcomes.

The approval may also be conditioned to ensure that a minimum amount of non-residential development is provided over the site and specifically that non-residential land use including Office, Health care service, Shop, Food and drink outlet and/or Indoor sport and recreation are provided on the ground level of buildings within Precinct 1, 6, 7 and 8.

5) *With the updated zoning plan provide clarity about what uses are proposed in line with City Plan 2014 definitions.*

Response:

For simplicity, the proposed preliminary approval may be conditioned to restrict future land uses to the following:

- Childcare centre;
- Food and drink outlet;
- Health care service;



- Indoor sport and recreation;
- Multiple dwelling;
- Office;
- Shop; and
- Short-term accommodation

This is reflected in the draft conditions in **Appendix E**.

Traffic

6) Provide an amended Traffic report to address the following:

Stage 2:

- The design is to be revised so that all external road works (including the provision of **standard** verges) are located within the existing road reserve and land that will ultimately be dedicated as road from the subject site. The works should tie into the existing road prior to 400 Miles Platting Road, noting the culverts under the road on the frontage of that site will be realigned and extended as part of the future corridor upgrade.*
- Remove the proposed right turn lane into the site from Miles Platting Road. The design is to be revised to include a short right turn lane to allow vehicles entering 326 Miles Platting Road from the east (at the School Road intersection) to store clear of the through lanes.*
- The adopted signal phasing for the Miles Platting Road/School Road intersection is to be revised to ensure that the Miles Platting Road pedestrian crossing is operated with full protection from the right turn movement out of School Road (i.e. runs in a different phase).*

Stage 3:

- The assumed future form of the Miles Platting Road/School Road intersection should be amended to include:

 - 170m long right turn lane into School Road.*
 - Conventional short left turn lanes on northern and western legs rather than left turn slip lanes.*
 - Westbound kerbside lane to continue as the left turn lane to the Gateway Motorway southbound on-ramp rather than terminating downstream of the intersection.**
- The assumed form of the Miles Platting Road/West Street intersection should be amended so that the storage length of the left turn lane into West Street is 40m.*
- The interim left turn movement from the site onto Miles Platting Road should be removed, noting the potential demand to access the right turn lane into School Road (which will develop upstream of the access location) and availability of alternative egress via the northern leg of the Miles Platting Road/School Road intersection. The interim left turn into the site could potentially be maintained, however additional land would need to be dedicated on a non-trunk basis to allow for this as the proposed design relies upon space in the corridor that will be utilised by Council's upgrade for other purposes.*
- Demonstrate that the proposed development will accommodate the area shown on road widening plan 318 Miles Platting Road - RC16095 - Issue 5 which provides additional space to maintain a left turn lane into the site when the Miles Platting Road upgrade is undertaken.*
- Construction of the internal section of the eastern access road (up to the site boundary) is to occur as part of Stage 3.*



Response: Colliers have provided a detailed response to each of the items identified above. Refer to the Traffic Response Letter in **Appendix C**, which includes an amended Traffic Engineering Report.

- 7) *Confirm the proposed tenure of the internal road network within the site. Note that Council will not accept retrospective requests to dedicate private roads (where not delivered to Council's public road standards) due to non-local use etc.*

Response: The internal road network through the site will be a private road, with the exception of the 'future vehicle connection' which will be a public road and will ultimately connect to the School Road extension.

Bushfire

- 8) *The uses and locations proposed on the site have the potential to be impacted by Bushfire and buffer areas. Further, the material provided identifies that to meet PO2 of the bushfire overlay code 'future development should include a minimum of 20m separate from classifiable vegetation'. However, the report (Page 14) identifies a minimum of 16 meters is required for BAL-29 and 32 meters is required for BAL-12.5. The submitted plans shows future development located within the proposed setback area which conflicts with the requirements of PO1 for residential or vulnerable/assembly/difficult to evacuate uses.*
- a) *In accordance with Bushfire overlay code and BCC's Technical Assessment Guide - Bushfire reporting submit a revised a Bushfire Hazard Report and Management Plan that demonstrates and provides:*
- i. *Flame temp of 1200K where following Method 2 (AS3959-2018) using alternative dataset (i.e. QFES datasets).*
 - ii. *Patch and Corridor Filtering as per Step B.2.1, Step 1 of the Fit for Purpose in accordance with Estimating the Potential bushfire hazard of vegetation patches and corridors - Leonard & Opie, 2017. Note: This is a GIS-driven exercise, manual assessment of patch and corridor filtering is unlikely to be accepted.*
 - iii. *All bushfire management areas (buffers and setbacks) are to be located wholly within the subject site. Proposed plans are to be updated with required bushfire setback which are to be in accordance with PO1 for residential or vulnerable/assembly/difficult to evacuate uses that are clearly shown on all plans.*
 - iv. *Further information as to how the proposed development can comply with PO4/PO5 of the Bushfire overlay code, with particular consideration of the proposed uses and proposed locations of the 'Main Road' and 'Private Road'.*

Response:

As requested by Council, a revised Bushfire Hazard Report and Management Plan has been provided which addresses the requirements above (refer to **Appendix D**).

Ultimately, any future development will be designed to ensure that an appropriate building separation, asset protection zones, defensible space, emergency access, evacuation arrangements and vegetation management measures can be achieved without relying on adjoining land. The amended plans will clearly identify the required bushfire setbacks and management areas so that future development is appropriately constrained and capable of complying with the relevant performance outcomes of the Bushfire overlay code.

Noise and Air Quality



- 9) *It is acknowledged that the future development applications will address Noise and Air concerns however, the proposed change of the zoning from industry uses to residential and commercial uses is located adjoining land that is still earmarked under the EMPGNP for a Gateway business precinct. To ensure compatibility of the proposed change of the uses on the site, in particular the sensitive uses proposed, need to ensure they are compatible with these adjoining uses allowed and the potential reverse amenity from an air quality and noise capacity and protects the viability of the specialist centre purpose by excluding development that could prejudice the establishment of new activities appropriate to the specific nature of the zone precinct in accordance with OO2b of the Specialised centre zone.*
- a) *Submit a Noise Impact Assessment Report and Air quality report demonstrating the proposed sensitive uses on the site are compatible with uses anticipated within the Gateway business precinct.*

Response:

The applicant acknowledges Council's concern that the introduction of sensitive uses must not prejudice the ongoing function of adjoining land within the Gateway business precinct or the broader Specialised Centre zone. The proposal has been prepared on the basis that residential and other sensitive uses will need to be appropriately designed and managed to coexist with existing and future 'gateway business activities' in the locality.

Even within the Gateway business precinct of the Eight Mile Plains gateway neighbourhood plan, the type of uses envisaged are generally low-impact uses such as low impact industry, office and warehouse uses, an educational establishment and smaller scale ancillary uses such as food and drink outlets, service industry and shop uses, which are not to have any offsite impacts in terms of noise or air quality. As such, the proposed uses, including residential uses, are not expected to be fundamentally incompatible with the surrounding planned employment environment, provided that appropriate siting, building design, acoustic attenuation, air quality mitigation and operational management measures are incorporated at the detailed design stage.

The application seeks a preliminary approval framework rather than approval of detailed built form. Accordingly, the detailed assessment of noise and air quality impacts can be appropriately undertaken as part of subsequent development applications, once the final siting, building orientation, façade treatments, ventilation strategy, podium design, communal open space locations and interface treatments are known. This will allow future applications to demonstrate, where relevant, that sensitive receivers are appropriately protected from existing and reasonably anticipated future activities within the surrounding Gateway business precinct. However, please note that we have engaged E-Lab to prepare a Noise and air quality statement in response to Item 9, which will be provided to Council shortly.

Importantly, the proposal does not seek to constrain or sterilise adjoining employment land. Any future sensitive uses will be required to be designed to achieve relevant acoustic and air quality criteria within the development site, rather than relying on changes to surrounding lawful or planned business activities. This approach maintains the viability of the Specialised Centre zone and supports the continued establishment of employment-generating activities while also enabling a high-quality mixed-use outcome on the subject site.



Summary

We offer this as a response to all of the information requested in Council's Further Advice.

Should any clarification be required, please contact me on 07 3251 9456 or email at liamwiley@saundershavill.com.

Yours sincerely
Saunders Havill Group

A handwritten signature in black ink, appearing to read 'LWiley', with a long, sweeping underline.

Liam Wiley
Principal Town Planner

