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HPC Ref: 25381
Application Ref: A006847516

22 May 2025

Brisbane City Council
Development Services
GPO Box 1434
Brisbane QLD 4001
DSPlanningSupport@brisbane.qld.gov.au



Attention: Justin Lynham

Dear Justin,

Information Request response under Part 3(13) of the *Development Assessment Rules: Development Permit for Material Change of Use for Warehouse on land at 267 Sherbrooke Road, Willawong QLD 4110 also known as Lot 4 on RP80241.*

In response to the Brisbane City Council information request dated 15 May 2026 the following information is provided and accompanied by the following documents:

- **Appendix A** – Amended Architectural Plans
- **Appendix B** – Copy of MUSIC Model File

Landfill Gas

1. It is acknowledged the site is within close proximity to the former Willawong Waste Transfer Station and the submitted Town Planning Report notes the landfill gas reporting undertaken as part of the development application for the adjoining site to the north. As landfill gas does not move uniformly and is unpredictable, reference to previous reports and differing sites does not address the assessment benchmarks of the Lower Oxley Creek North neighbourhood plan (LOCNNP) code.

- a) To address PO1 of the LOCNNP code provide a Landfill Gas Preliminary Site Investigation Report that:
- i. Engages 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;

*Note 1 - 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-glassessing-suitably-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 SQP in accordance with the Environmental Protection Act 1994: <https://aclca.com.au/qld/our-members-qld/>

- ii. *Conducts a Preliminary Site Investigation in accordance with the National Environment Measure (Assessment of Site Contamination) Measure 1999 (as amended in 2013) (NEPM) and the following:*
- *As part of the Preliminary Site Investigation, the SQP must undertake historical aerial photography review for the Site and confirm whether 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, and 2023);*
 - *As part of the Preliminary Site Investigation, the SQP must also conduct a Landfill Gas Risk Assessment (LGRA), given the development site's proximity to the Willawong Closed Landfill Facility (i.e. NPP-001 Willawong renewable energy, and BPP-002 Limited development as shown in the Lower Oxley Creek north precinct boundary online Brisbane City Plan mapping)*
 - *The Landfill Gas Risk Assessment must 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/contaminated-land/19p2047-hazardous-ground-gasesguidelines.pdf?la=en&hash=877EF007BFDEAF5163431351EB3C5A73FCBF7EFE>);*

Note 2: If the Preliminary Site Investigation identifies the potential for unacceptable levels of risk to health, safety and wellbeing from sub-surface landfill emissions (including landfill 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 may 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.

*Note 3: 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.*

- from buried 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.*

Response:

The applicant has engaged a suitably qualified consultant to respond to Item 1. The requested information will be provided in due course once the assessment has been completed.

Refuse Collection

2. In accordance with PO17/AO17.2 of the Industry code, PO19/AO19.1, AO19.2, AO19.3 of the Transport, access, parking and servicing code, and PO8/AO8.1 and AO8.2 of the Infrastructure code, provide the following:

- a) Amended architectural plans demonstrating both refuse storage areas are either within a building (within a room) or a refuse enclosure (roofed and wholly screened) with a minimum GFA of 4.65m² (internal dimension of 3.2m x 1.5m). The dimensions must be clearly demonstrated on the amended plans. Ensure to denote 'Roofed and wholly screened refuse enclosure'. Remove reference to indicative bins;

Note: Where screening is utilised to form part or all of a refuse storage area, the screening is to have a maximum of 25% openings, with a maximum opening dimension of 50mm, and are to be permanently fixed, durable and maintainable.

- b) Clearly demonstrate the intended refuse enclosure access points, doors, gates or the like; and
- c) Submit a revised RPEQ certified swept path analysis for an RCV (As per standard drawing BSD-3008-2) which demonstrates safe and efficient entry and exit manoeuvres in a forward gear.

Note: Council core services include general refuse, commingles recycling and green waste. To support sustainable development and landfill diversion, Council encourages the use of its green waste service. If the development is proposing to utilise the green waste service from Council, amend the proposed plans to demonstrate sufficient storage for the required number of 240L green waste mobile garbage bins. Refer to:

<https://www.brisbane.qld.gov.au/content/dam/brisbanecitycouncil/corpwebsite/aboutcouncil/documents/waste-management-technical-notes.pdf>.coredownload.pdf

Response:

Refer to amended Architectural Plans. Responses to individual items are provided below:

- a) The amended Site Plan includes detailed bin area illustrations, including roof plan, sections, and a 3D view, located at the top of the sheet. Both refuse enclosures provide minimum internal dimensions of 3.2m x 1.5m, as shown on the revised Site Plan and clearly annotated within the bin area details.
- b) Access points and doors have been clearly annotated on the revised Site Plan.
- c) This has been addressed within the Traffic Impact Assessment. Please refer to Plan No. 80692-SK2, which includes the RPEQ-certified swept path analysis for a RCV.

State Planning Policy Bushfire mapping

3. The site is mapped as Potential Impact Subcategory within the State Planning Policy Natural hazards, Risk and Resilience bushfire mapping, triggering assessment against sections A and B of the Bushfire overlay code.

PO1 of the Bushfire overlay code requires that development within the Bushfire overlay addresses bushfire hazard determined by a bushfire hazard assessment and achieves the relevant radiant heat exposure threshold. Additionally, if any hazardous chemical exceeding the amounts specified in Table 8.2.5.3.D are proposed to be stored on site, development must demonstrate that it does not cause unacceptable risk to people, property and the environment as a result of a bushfire impacting the site (PO10). The following information is required in response to the Bushfire overlay code:

- a) Provide a site-specific bushfire hazard assessment in accordance with the Bushfire Planning Scheme Policy or other approved methodology. Where within a bushfire prone area, provide a radiant heat exposure assessment to demonstrate compliance with PO1 of the Bushfire overlay code. Bushfire reporting and hazard assessment guidelines are available within the technical assessment guide for Bushfire reporting available on Council's website; and

Note: If the bushfire hazard assessment determines a hazard score of 'low', no further assessment against the code is required. If a hazard score of 'medium' or 'high' is determined, an assessment against relevant sections of the code and a Bushfire Management Plan are required.

- b) Provide an assessment against the relevant sections of the Bushfire overlay code, based on the findings of the Bushfire reporting.

Response:

The applicant has engaged a suitably qualified consultant to respond to Item 3. The requested information will be provided in due course once the assessment has been completed.

Stormwater Quality – Stormwater Quality Management Plan

4. Submit a digital copy of the MUSIC modelling file for assessment.

Response:

A digital copy of the MUSIC model has been provided as part of this response.


The above information and the attached appendices constitute a partial response to Council's information request, made in accordance with section 13.2(b) of the DA Rules. The reporting required to address item 1 and 3 in the information request is not anticipated to impact the design or appearance of the development and we therefore seek to progress the DA process to public notification whilst these matters are addressed.

A Notice of Commencement for public notification will be provided to Council shortly.

If further information or clarification is required, please contact the undersigned on 3217 5800 or 0457 472 576.

Yours sincerely,

HPC Planning
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