



Our Ref: PL2222

Your Ref: A004685227

15 January 2021

The Chief Executive Officer

Brisbane City Council

GPO Box 1434

BRISBANE QLD 4001

Via email: edaeast@brisbane.qld.gov.au

Attention: Helen Danalis – Senior Urban Planner
Development Assessment Planning Services East

Dear Helen,

RE: RESPONSE TO OUTSTANDING MATTERS

**Development Permit for Reconfiguring a Lot (2 Lots into 41 Residential Lots plus New Road,
Environmental Reserve, Drainage Reserves and Balance Lots (Future Stages))
381 Rochedale Road and 216 Gardner Road, Rochedale (Lots 1 & 2 on RP115631)
Council Reference: A004685227**

1. INTRODUCTION

We refer to your Further Advice letter dated 22 March 2018 in relation to the abovementioned application. A Response to Outstanding Matters, in reference to this Further Advice letter, was provided to Council with supporting material on 19 December 2018. Since the Response to Outstanding Matters was provided to Council, further changes have been made to the proposed development, designed through both discussions with Council and through resolution of matters relating to Planning and Environment Court Appeal No. 2392 of 2019 on the adjoining land. As such, this letter provides an Additional Response to Outstanding

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Matters, taking into account these design changes. The items addressed therein are summarised in Section 2 of this Response.

This response is supported by the following information:

- **Appendix A:** Revised Plan of Reconfiguration (Rev. AC) prepared by Wolter Consulting Group;
- **Appendix B:** Revised Development Concept Plan (Rev. U) prepared by Wolter Consulting Group;
- **Appendix C:** Revised Bushfire Hazard Assessment and Management Plan, prepared by Rob Friend & Associates Pty Ltd;
- **Appendix D:** Revised Engineering Services Report prepared by Meinhardt Group;
- **Appendix E:** Revised Stormwater Management Plan prepared by Meinhardt Group;
- **Appendix F:** Revised Tree Retention Assessment Plan prepared by Saunders Havill Group; and
- **Appendix G:** Judgment handed down by His Honour Judge Everson on 13 October 2020 in relation to Planning and Environment Court Appeal No. 2392 of 2019.

2. SUMMARY OF INITIAL RESPONSES TO MATTERS RAISED

Since the original Response was prepared and provided, the specifics of the application have been further refined in consultation with Council to improve the outcomes of the ultimate development. This response has been delayed while Appeal No. 2392 of 2019 proceeded in relation to development on adjoining land (220-224 Gardner Road, described as Lots 1 and 2 on RP84459), the original approval (A005055466) for which was not consistent with our current application. As a Judgment has now been handed down approving the changed development application on the adjoining site (refer to **Appendix G**) Council approval of the subject development is now sought to allow the development of both sites to proceed.

This Further Response to Outstanding Matters is provided to explain the changes made to the development application in accordance with section 52(1) of the *Planning Act 2016*. These changes are minor and, in accordance with section 52(3), do not affect the development assessment process. The changes are summarised as follows:

- **Number of lots:** 41 residential lots are proposed, plus 5 drainage reserve lots, 1 bio basin lot, 1 environmental reserve lot and 3 balance lots for future stages. This is a slight increase in comparison to the number of proposed lots shown in the Response to Outstanding Matters letter provided,

however remains consistent with the development as originally applied for (the former plan of reconfiguration, prepared by Wolter Consulting Group, drawing number SB2222-05 and revision A submitted on 28 June 2017) and therefore consistent with the application fee as paid;

- **Staging:** the application has been amended to sub-stage Stage 2, reflecting the different options for where this stage could commence, depending on timing of adjacent development and resultant road connections. This will not necessarily be carried out sequentially, to provide flexibility to the proponent in the context of this emerging community;
- **Temporary access to Gardner Road:** the construction of Frangipani Street within Rochedale Estates to the south facilitates access without the need for the temporary access driveway as originally proposed. The temporary access driveway originally proposed has now been removed;
- **Ecological corridor:** the ecological corridor, originally proposed to be temporarily used for the temporary access driveway and later rehabilitated, is no longer required as access via Frangipani Street is now available;
- **Internal road network connection:** a section of the proposed internal road network connecting to Frangipani Street is to be constructed as part of whichever sub-stage of Stage 2 is constructed first. It is requested that a condition requiring this be imposed to ensure access is provided, regardless of the order of construction of Stage 2;
- **Northern road:** the location of the proposed new road along the northern boundary of the access handle has been relocated to the southern side of proposed Lots 2-20. The lot layout was amended in consultation with Council and to be consistent with the recent adjoining development approval to the south (refer to Judgment included at *Appendix G*).
- **Bushfire hazard assessment:** To support the relocation of the abovementioned road and demonstrate no increased risk to life or property from bushfire hazard to the north, a revised Bushfire Hazard Assessment and Management Plan has been prepared by Rob Friend & Associates Pty Ltd and is provided at *Appendix C*;
- **Waterway corridor:** the position of the waterway corridor has been agreed with Council, having been informed by a combination of city-wide mapping, local plan mapping and ground-truthed data. Refer to the Revised Plan of Reconfiguration and Development Concept Plan at *Appendices A* and *B*;
- **Lot 1 size and shape:** minor changes have been made to the exact size and shape of proposed Lot 1, which contains the existing house, with a significant portion of the house yard within Lot 1 to now be dedicated to Council as a drainage reserve; and
- **Bio-retention basin:** the bio-retention basin, previously identified as Lot 906 located along the western waterway corridor, has now been removed with drainage incorporated into the waterway

corridor, as discussed and agreed with Council. Following consultation with Council, seven (7) water sensitive urban design (WSUD) street trees have been provided along the western handle of the site in lieu of the bio basin adjacent to the western waterway, at a rate of 1 per 3 lots proposed.

3. FURTHER RESPONSES TO MATTERS RAISED

In response to Council's Further Advice letter, preliminary changes to the proposed development layout were made in advance of the provision of the Response to Outstanding Matters, on 19 December 2018. The changes described within the Response are minor changes and do not affect the development assessment process. Following consultation with Council and our consultant team and resolution of the appeal mentioned above, further and final changes to the development application are now proposed. These changes are detailed below.

Council Request Item 1 – Structure Planning & Staging

A review of the proposed road along the northern boundary of the site is to be undertaken to demonstrate that the land to the south (224 Gardner Rd/Lot 2 on RP84459) is not landlocked and inhibited from development. In addition, a road connection or maintenance access is to be provided from new roads in the proposed development to the public land to the north.

Our Further Response

As you will recall, our initial Response to Outstanding Matters letter of 19 December 2018 did not vary the proposed road along the northern boundary, as this was considered the most efficient outcome at the time, from a Structure Planning perspective.

Following further consultation with Council and to be consistent with the recent approved development to the south (decided through appeal), the location of the proposed new road along the northern boundary has now been relocated to the southern side of proposed Lots 2-20 and 905. A road connection continues to be provided north-ward to accommodate access for future development of the adjoining lot to the north (Lot 5 on RP114765). This proposed road will be a partial road to complete the three quarter width road to be provided as part of the adjoining development approval. Our client will accept a sequencing condition for this sub-stage to restrict the timing of sealing of the plan of survey until after the adjoining road dedication and construction has been completed.

In addition to the realignment and redesign of the proposed road, the extent of retaining was also a significant matter in the appeal regarding development to the south. The outcome involves a balancing of retaining across the two sites to best manage the significant level differences. Consistent with this outcome, terraced retaining is proposed, at a ratio of 1.5 vertical metre to 1.0m horizontal metre. As discussed during our meeting with Council on 15 June 2020, this is slightly above the acceptable outcome of 1 vertical metre to 1 horizontal metre under AO2.1 of the Filling and Excavation Code however it achieves the corresponding performance outcome PO2 (and PO1 regarding visual amenity) given:

- a) The terrace is internal to the site and will be suitably landscaped; and
- b) The retaining wall will be designed and constructed to be fit for purpose, will not impact on vegetation and will be capable of easy maintenance.

Refer to the revised Plan of Reconfiguration and Development Concept Plan, prepared by Wolter Consulting, and included at **Appendices A** and **B**, and revised Civil Engineering Drawings prepared by Meinhardt at **Appendix D**. The Development Concept Plan is not intended to be an approved document. It has been provided to show a possible ultimate layout over the site and assist with informing the provision of services, for information purposes only.

To ensure the relocation of the road does not increase the risk to people or property, a Revised Bushfire Hazard Assessment and Management Plan has been prepared by Rob Friend & Associates Pty Ltd. The revised Plan, which is included at **Appendix C**, found that the relocation of the road does not change the analysis or findings and that the mapped area and surrounds can be described as having Low bushfire hazard. No impact or adverse findings on the risk of bushfire have been identified and therefore a response to PO1 of the Bushfire Overlay code only is required, which has been provided as part of the revised Plan.

Council Request Item 2 – Structure Planning & Staging

The road connecting to Lot 5 on SP248915 (proposed Rochedale Estates Stage 6 at 232 Gardner Road) is to be a 16m wide neighbourhood road with a 7.5m wide pavement. The road through the proposed development is to connect down to the south toward the future Ford Road extension. The current plans show this as 16m wide road with a 5.5m wide pavement.

Our Further Response

As detailed within our original Response to Further Issues letter, the new road connecting to Lot 5 on SP248915 and to the south was revised to incorporate a road pavement width of 7.5 metres required for the 16 metre wide road. This has been maintained on the reused plans.

Council Request Item 3 – Structure Planning & Staging

The waterway corridor area currently shown on the plans does not appear to be based on the mapping from City Plan 2014. The proposed development appears to encroach into the mapped waterway corridor. All development within core areas of the waterway should be removed and the areas dedicated to Council as land for trunk waterway.

Our Further Response

The precise location of the waterway corridor and fringe has been the subject of extensive discussions with Council, informed by a combination of city-wide mapping, local plan mapping and ground truthed data. Accordingly, a Waterway Corridor Mapping Review was undertaken and included as part of the initial response. Through these discussions, the position of the waterway corridor and proposed development has been agreed with Council. Refer to the revised Development Concept Plan, prepared by Wolter Consulting, and included at **Appendix B**.

While the length of road fronting the dedicated public realm along the waterway corridor has been reduced, compliance with PO10 of the Rochedale urban community neighbourhood plan code and AO10.6 of the Subdivision code, both requiring 50% road frontage, is still achieved. Though not ‘public parkland’, adequate surveillance from the minor road is provided and supported by the bikeway located along the full length of the corridor.

Council Request Item 4 – Structure Planning & Staging

The retention of the existing house is not supported as:

- a) It is located within the mapped waterway and adjacent to extreme flood hazard.*
- b) Waterways in the Rochedale urban community neighbourhood plan area are designed to contain all flood events (typically up to the PMF), of which keeping the house will expose it to extreme hazard in larger flood events.*

- c) *The house is on land that has a trunk item that is noted as being dedicated to Council and must be removed.*
- d) *The submitted flood study notes extreme flood velocities of 10m/s that will erode the waterway and undermine the house (regardless of riprap). This study is significantly underestimating flows and flood levels.*

Our Further Response

Justification for the retention of the existing house was provided as part of the original Response to Further Issues letter. As agreed with Council, the existing house, while presently located within the mapped waterway and adjacent to flood hazard, was demonstrated as part of the Waterway Corridor Mapping Review Plan to not be located within the ground truthed waterway and not a risk of flooding by virtue of future major trunk stormwater works to divert flows within the site. In addition, the construction of the existing house pre-dates the nomination of the mapped waterway corridor; the construction of a new house within the mapped waterway is not proposed. Minor changes to the exact size and shape of Lot 1 have been made following discussions with Council, with a significant part of the house yard dedicated to Council as a drainage reserve.

Council Request Item 5 – Trunk Infrastructure

The following trunk infrastructure is required as per SW275 & SW276 of the PIP and PO12, PO14, PO15 and Figure b of the Rochedale urban community neighbourhood plan code:

- a) *Stormwater: Council requires the construction of the trunk drainage from Rochedale Road to the waterway corridor (ROC-PR-157 & ROC-PR-153). This infrastructure is within the subject site and is required to aid in managing upstream flows and enabling orderly development of the catchment. Council's latest analysis and planning has identified the required drainage to be twin 1950mm RCP's that need to be located within the 'handle' area of the site. The drainage will need to extend approximately 50 metres north along the waterway and discharge into a plunge pool energy dissipater.*
- b) *Waterway: The waterway corridor as mapped is to be dedicated to Council under the neighbourhood plan as it is trunk waterway. Further to item 4, submit amended plans removing the existing house in proposed lot 500, which is within the waterway core area, and modify the subdivision layout so no lots are within the waterway corridor. It is noted that roads and WSUD can only be located within the fringe waterway area (10m fringe width) and not the core waterway area.*

- c) *Provide revised Engineering drawings to show the trunk pipe fully contained on the proposed development site as this will minimise tree clearing and allow the pipe to be constructed. Ensure the pipe is located in the drainage reserve (proposed lot 900). The area of drainage reserve may need to be extended further south. The area to the south of proposed lots 500 and 900 are within an existing and future overland flow path, and this area should either be road reserve or drainage reserve.*
- d) *Road Dedications: Dedicate as road to Council a road widening of 6.3m in accordance with widening plan RC16048 Issue 16 along the Gardner Road frontage (ROC-RC012), and a 7.1m widening along the Rochedale Road frontage (ROC-RC-006) of the site in accordance with widening plan RC16048 Issue 16.*
- e) *PIP items – It should be noted that Council will be conditioning the following trunk stormwater drainage on this development being PIP items:*
- i. ROC-PR-157 (works)*
 - ii. ROC-PR-153 (works - which will need to be redirected within the land)*
 - iii. ROC-LA-002 (Land for Waterway corridor - Core)*
 - iv. ROC-LA-014*

Our Further Response

A response to this item was provided in full as part of the original Response to Further Issues letter. As agreed with Council, further changes to the trunk infrastructure items to be delivered as part of this development are not proposed.

Council Request Item 6 – Stormwater Quantity

The following issues and amendments are required in order to demonstrate compliance with PO1, PO2, PO3, PO4, PO5, PO6, PO8, PO10, PO11 & PO12 of the Stormwater code:

- a) *Further to item 4, the existing house on proposed lot 500 cannot be retained in the waterway corridor. The house is also within the discharge point of a major flow path/creek and will be at very high risk of being scoured/undermined (modelling identifies velocity of 3 to 10m/s). The house will also be susceptible to flooding after full upstream catchment is developed.*
- b) *Provide plans, sections and details for the proposed bio-retention basins, as nominated in the Site Based Stormwater Management Plan.*

Our Further Response

A response to this item was provided as part of the original Response to Further Issues letter. The only change now proposed is the removal of one of the bio-retention basins, previously located along the site's western waterway corridor and identified as Lot 906, as per current standards and as agreed. Following consultation with Council, seven (7) water sensitive urban design (WSUD) street trees have been provided along the western handle of the site in lieu of the bio basin adjacent to the western waterway, at a rate of 1 per 3 lots proposed. Refer to the civil engineering drawings prepared by Meinhardt Group (**Appendix D**).

Council Request Item 7 – Stormwater Quality

The following issues and amendments are required in order to demonstrate compliance with PO16 of the Stormwater code.

- a) A Stormwater Management Plan is required to address the requirements in the Stormwater code and the Infrastructure Design Planning Scheme Policy.*
- b) Provide cross sections with levels for all proposed Bio-retention basins to demonstrate they fit within the area provided and can drain.*
- c) Bio-retention swales do not work unless a linear basin, as grade fails to create necessary ponding.*
- d) Applicant to provide HEC-RAs model to Council.*

Our Further Response

A response to this item was provided as part of the original Response to Further Issues letter. As above, the only further change is the removal of the bio basin formerly provided in Lot 906.

Council Request Item 8 – Flooding

The following issues and amendments are required in order to demonstrate compliance with PO5, PO8, PO12, PO17 & PO18 of the Flood overlay code:

- a) Submit a Flood Assessment Report to assess the requirements in accordance with the Flood overlay code, Flood Planning Scheme Policy and the Stormwater code. The report must be RPEQ certified by an Engineer with expertise in undertaking flood studies.*
- b) The flood study contains many errors and needs to be amended/rectified taking the following into consideration:*

- i. *Catchment A1 is incorrect, underestimating flows. Catchment A1 is 64ha (the trunk pipe system drains is 55.6ha from the eastern side of Rochedale Road and approximately 8.2ha existing from the PASK land to the south on the western side of Rochedale Road).*
- ii. *The flood study has assumed incorrectly that the upslope catchments will have detention. The purpose of trunk roads, trunk stormwater infrastructure and trunk waterways is to accept the fully developed catchment flows. Therefore, none of the flood analysis and proposed flood levels are acceptable and a reanalysis of the flooding must be undertaken.*
- iii. *HEC-RAS section locations need to be shown on a plan and need to extend to Rochedale Road (the mapped overland flow path and waterway).*
- iv. *Manning's roughness values are incorrect. For setting flood immunity they are required to be 0.15 for all waterways (as clearly noted in City Plan 2014) and 0.10 through other areas (except roads). For existing conditions the Manning's values should not be less than 0.08.*
- v. *A velocity of 10m/s in a waterway (CH600) is not reasonable, nor sustainable to locate a house next to, as the channel/banks will be scoured even where protected with rock. This clearly does not support any location of the existing house adjacent to the waterway.*
- vi. *Where velocity is high confirm the flood immunity levels are higher than the energy grade line in all cases as using the water surface profile would significantly underestimate flood levels.*

Our Further Response

A response to this item was provided as part of the original Response to Further Issues letter. Further changes to this item are not proposed.

Council Request Item 9 – Traffic

The following issues and amendments are required in order to demonstrate compliance with PO3, PO5, PO6, PO7 of the Road hierarchy overlay code and the PO1, PO2, PO3, PO4 & PO9 of the Transport, Access, Parking and Servicing code.

- a) *A full Traffic Impact Assessment (TIA) is required for this development under Section 2 of the Transport, Access, Parking and Servicing Planning Scheme Policy where, as stated:*
 - i. *the site is more than 1ha in the Emerging communities zone; or*
 - ii. *the site is more than 7,000m² in the Low density residential zone; or*
 - iii. *the number of lots is 20 or more.as the proposal exceeds 20 lots.*

Provide a TIA to specifically address Stage 1 of the development, including the access to Gardner Rd, and also address the proposed future structure plan for future stages and the ultimate development.

A full analysis is not required for the future stages and ultimate development.

Our Further Response

A Traffic Impact Assessment (TIA) Report was prepared by TTM Consulting to address this item. The report supported the proposed layout including access to Gardner Road, which is no longer proposed as vehicular access is to be achieved via a constructed and dedicated road (Frangipani Street), part of the Rochedale Estate. The TIA considered the temporary access solution until the construction of the road through Stage 6 of the Rochedale Estate (Frangipani Street) was completed, and also considered the ultimate arrangement. Therefore, formal amendment to the TIA is not necessary. Negating the need for the temporary access arrangement is considered to be an improved outcome for access.

Council Request Item 10 – Earthworks

The following issues and amendments are required in order to demonstrate compliance with PO1, PO2, PO5, PO6, PO9 & PO10 of the Filling and Excavation code and the PO1, PO2 & PO4 of the Landslide overlay code:

- a) Details of retaining walls proposed adjacent to the waterway are to be provided. Council's preference is for batters and natural landscaping adjacent to waterways where possible, or boulder retaining walls to preserve a natural aesthetic to the waterway corridors. Submit sections through lots 901 & 902 and the road running parallel to the waterway to demonstrate earthwork impacts on the waterway and that earthworks will not impact on flood extents.*

Our Further Response

Additional details of the retaining walls adjacent to the waterway, as well as sections through Lots 901 and 902 and the road running parallel to the waterway, were provided within the revised Engineering Services Report prepared by Meinhardt Group and included in **Appendix D**. The additional information demonstrated compliance with the relevant performance outcomes of the Filling and excavation code and the Landslide overlay code.

Council Request Item 11 – Ecology

The Rochedale urban community neighbourhood plan maps part of 216 Gardner Road as ‘Habitat Areas and Ecological Corridor (public)’. This area forms an important strategic ecological corridor between Gardner Road and the mapped waterway corridor which traverses the site. This area is to be retained in a natural state with no development intrusion. Council supports a temporary access easement in the north portion of this land and will require rehabilitation post closure of this temporary access.

a) Submit amended plans identifying this area as public land to be dedicated to Council. The mapped waterway corridors are to be fully rehabilitated for ecological purposes and dedicated to Council as public land.

Our Further Response

As addressed above, vehicular access will be via the constructed and dedicated Frangipani Street through Stage 6 of the Rochedale Estates, and ultimately from the land to the immediate south of the access handle. The ecological corridor will therefore now be retained in situ and future rehabilitation will not be required.

Refer to the revised Tree Retention Assessment prepared in support of the proposed changes which illustrates native trees to be retained and trees to be removed as a result of the proposal at **Appendix F**.

Council Request Item 12 - Ecology

Amend the Engineering drawings to remove bio-retention basin earthworks batters from the mapped City Plan 2014 waterway corridors, in areas where existing vegetation will be affected by the proposed earthworks.

Our Further Response

While minor changes to the size and design of Lot 902 (previously Lot 901) are proposed, the intent remains the same. This solution is considered suitable, following extensive consultation with Council. As above, the only change proposed is the removal of one of the bio-retention basins, previously located along the site’s western waterway corridor and identified as Lot 906. As mentioned above, following consultation with Council, seven (7) water sensitive urban design (WSUD) street trees have been provided along the western handle of the site in lieu of the bio basin adjacent to the western waterway, at a rate of 1 per 3 lots proposed.

Council Request Item 13 – Bushfire

The Bushfire overlay affects the site (Medium and High Hazard Area, High Hazard Buffer Area). As minimum changes were made in response to Council's Information Request, a Bushfire assessment should be undertaken. This assessment is to be against the Bushfire overlay code and Bushfire Planning Scheme Policy. Any required bushfire management buffers must be located outside of any mapped Biodiversity overlay areas, Core Waterway Corridor Areas, or any other areas identified for protection of habitat or ecological corridor functions. The required fringe waterway corridor area and esplanade roads can be used to perform a bushfire management buffer function.

Our Further Response

As noted above, a revised Bushfire Hazard Assessment and Management Plan has been prepared by Rob Friend & Associates Pty Ltd which concluded that the subject site, including the relocated northern road, is located within an area of Low bushfire hazard. Refer to **Appendix C**, which includes a response to PO1 of the Bushfire Overlay Code as required.

Council Request Item 14 – Noise - Industrial Amenity

Part of the site being in is close proximity to brickworks and refuse disposal/fuel burning site and is located within the Industrial amenity investigation area of the Industrial amenity overlay and as such it needs to be demonstrated that an adequate level of noise can be provided:

- a) *Please submit further information demonstrating that the proposed residential lots 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, please submit 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.*

Our Further Response

A Noise and Air Quality Impact Assessment Report was prepared by ANE Consulting as part of our initial response, addressing compliance with the Industrial amenity overlay code. The Report concluded that the potential for air and noise impacts from industry upon future uses are negligible and within acceptable standards. Further changes to this item are not warranted or proposed.

Council Request Item 15 – Air Quality

Part of the site being in is close proximity to a brickwork and refuse disposal/fuel burning site and is located within the Industrial amenity investigation area of the Industrial amenity overlay and as such it needs to be demonstrated that an adequate level of air quality can be provided:

a) Please submit further information demonstrating that the proposed use can comply with the separation distances as prescribed in A)1.1/AO1.2 of the Industrial amenity overlay code. Where compliance with the separation distances cannot be achieved, an Air Quality Report is to be prepared and submitted in accordance with the Air Quality Planning Scheme Policy to demonstrate compliance with PO1 of the Industrial amenity overlay code.

Our Further Response

As described above, a Noise and Air Quality Impact Assessment Report was prepared by ANE Consulting as part of our initial response, and further changes to this item are not warranted or proposed as the potential for air and noise impacts from industry upon future uses are negligible and within acceptable standards.

4. CONCLUSION

Thank you for your attention to this matter. We trust this response now finalises any outstanding issues with this application, allowing an approval to be issued subject to reasonable and relevant conditions. We would appreciate the opportunity to review draft conditions prior to issue.

Should you have any further queries regarding this application, please do not hesitate to contact the undersigned on (07) 3666 5200.

Yours sincerely,



Natalie Rayment

Executive Director

Wolter Consulting Group