



Dedicated to a better Brisbane

2 July 2026

Goodman Property Services (Aust) Pty Ltd
C/- HPC Planning
PO Box 15038
CITY EAST QLD 4002

ATTENTION: Christopher Lewis
Application Reference: A006973579
Address of Site: 39 GARDNER RD ROCHEDALE QLD 4123

Dear Christopher

RE: Further advice

Council officers have reviewed the proposed s81 request to change (minor) application and have identified the below further issues to be addressed.

Application pathway

- 1) The request has been lodged as a change application for a minor change under section 81 of the *Planning Act 2016*. Based on the material provided, Council does not consider that the proposed change satisfies the statutory requirements for a minor change, as the proposal results in substantially different development. The extent and nature of the changes, including the reduction to the waterway corridor width, associated changes to the culvert and flood conveyance arrangements, and the proposed relocation and redesign of access arrangements to Gardner Road, are not limited or inconsequential in nature and give rise to new impacts for assessment. The proposed changes are considered to result in impacts to the transport network, impact on infrastructure provisions, changes the ability of the development to operate as intended, and introduces new impacts to the development. The proposal is considered to constitute substantially different development as described in the *Planning Act 2016*.
 - a) Council therefore considers that the request should be made as a change application for a change other than a minor change under section 82 of the *Planning Act 2016*. Council requests that the application be withdrawn and relodged as an s82 other change request.

Waterway and Culvert

- 2) The application proposes to substantially reduce the waterway widths compared to the original approval. This is a major waterway, identified as a QLD fishery habitat (waterway barrier orange classification). The changes proposed to the width of this corridor are significantly less than identified in *City Plan 2014* (approx. 100m). Further details and amendments are needed to be addressed as follows:
 - a) While the location of the waterway can be modified to an extent, the total width should be no less than 100m as per *City Plan 2014* mapping given waterways in smaller order creeks upslope are providing larger waterway widths than this application.

- b) Earthworks in the waterway are to address the compensatory earthworks Planning Scheme Policy (PSP) unless a 100m waterway width is restored.
- c) The proposal appears to be relying on rock scour protection for all of creek base, yet this conflicts with QLD fisheries and *City Plan 2014* waterway requirements. The design should minimise the need for such protection by providing adequate waterway area via a wider waterway as previously approved.
- d) Provide details as to soil types and geomorphological assessment of creek to support scour potential and protection.
- e) Scour potential and stabilization design of creek during construction to be assessed with bank-full flows being 1EY event.
- f) The waterway through the site is a QLD fisheries mapped waterway barrier works (orange) and all works and crossings must comply with the Stormwater code Natural Channel design requirements, and the QLD government accepted development for Waterway Barriers (Orange).
- g) Provide a culvert general arrangement and confirm whether the Gardner Road culvert can be constructed without works on upslope lands.
- h) The culvert crossing of Gardner Road is trunk LGIP item ROC-CU-021. This item must provide fauna passage with wet and dry cell design and ensure that the standard of service for a suburban road is met being that the 1% AEP flow does not overtop the road. Provide a general arrangement showing such a culvert arrangement.
- i) Provide details of creek works including cross sections at various location and ensure it conforms to natural channel design with low flow channel and overbanks with no retaining.

Access

- 3) The proposed change in the access location along Gardner Road is not a supported outcome and is considered to impact on the safety and efficiency of the Garden Road corridor at this location as detailed below.
 - a) The proposal introduces a multilane configuration at the Rochedale landfill access, which will require signalisation of that intersection for safety reasons (noting its B-double usage, and insufficient median width to allow a design vehicle to stage a right turn movement out of the facility). The proposed intersection spacing (approximately 100m) does not provide for reasonable spacing of signalised intersections for coordination and will result in potential “see through” effects. It is noted that the Infrastructure Design PSP (section 3.2.6.5) seeks a 400-500m spacing between signalised intersections for coordination, and that the 100m spacing quoted in section 3.3.6.3 in the IDPSP is specifically for the minor road network whereas Gardner Road is classified as a major (suburban) road in the road hierarchy overlay.
 - b) While traffic survey data was obtained for a single day at the Rochedale landfill access, it is noted that usage of the facility changes from time to time due to operational and industry needs. For instance, the facility currently accepts construction waste from the south transported by 20m articulated vehicles and is expected to soon be accessed by RCVs approaching from the south. The proposed length of the right turn pocket into the landfill is based on storing only a single passenger car, which does not sufficiently cater for current facility operations let alone provide for flexibility of potential future operations.
 - c) In conjunction with the adjoining application currently under assessment (Council Ref. A006987246) to the south, providing permanent access from Prebble Street should be investigated for this site.
- 4) Notwithstanding the above, any further assessment of the proposed access intersection must address the following.
 - a) Clarification of whether the adopted 150,000sq.m GFA yield includes 227 Gardner Road.

- b) The SIDRA layout appears to have dual full length departure lanes into the site, which does not reflect the concept design (which terminates the kerbside departure lane shortly downstream of the intersection). This has the effect of overestimating the capacity of the intersection.
- c) While unprotected on-road bicycle lanes have previously been delivered along sections of Gardner Road (including on the frontage of the northern portion of the RME), Council is currently reviewing planning for the major Rochedale network activity transport facilities against contemporary standards and guidelines. While details can be resolved at a future operational works stage, cycling infrastructure on sections of Gardner Road yet to be widened is likely to take the form of protected lanes or off-road paths. To better address the potential conflicts between riders and left turning traffic, the design is to employ short conventional left turn lanes rather than slip lanes.
- d) The intersection is to include pedestrian crossing facilities on the Gardner Road legs.
- e) The length of the right turn lane into the Rochedale Landfill access is to be sufficient to store a minimum of two (2) 20m long articulated vehicles.

Rehabilitation

- 5) Environmental Assessment Report and Concept Rehabilitation Plan have been submitted to support the change application made to the existing Preliminary Approval. With respect to environmental outcomes, the revised plans involve amending the extent and boundaries of proposed rehabilitation to accommodate and amendments to the industrial use area, site access and internal accesses.

The proposed changes to the Rehabilitation area originally approved under condition 9 of the Court approved Preliminary Approval result in reduction in the ecological outcomes over the site. There is concern over the changes to approved corridor widths and the requirements of subsequent approvals to be generally in accordance with the approved plans.

The proposed Concept Rehabilitation Management Plan reduces the proposed width of the waterway corridor to approximately 70m in some locations where the approved plans identify corridors approximately 100m in width. The existing powerline easement is located entirely within the southern half of the proposed rehabilitation corridor, meaning all proposed rehabilitation south of the waterway centreline will be constrained by the easement. Rehabilitation works within the powerline easement are limited to vegetation that will not grow >4m, meaning that canopy trees will not form part of rehabilitation works further limiting continuity of the waterway corridor rehabilitation, connectivity to the east and limiting the ecological outcomes of the proposal in relation to the current approved outcome.

Additionally, the Court approved plans, explicitly identify that '*the corridor width (is) to be maintained if entry road changes*' along the Gardner Rd frontage, further demonstrating the intent to retain the 100m width of the waterway in the east of the site.

- a) Provide amended plans illustrating an increase in the width of the proposed rehabilitation corridor to a minimum 100m width. This redesign of the rehabilitation area will allow for a more consistent outcome with the existing approval in relation to ecological outcomes for the waterway corridor rehabilitation. In addition to this, widening the width of the rehabilitated corridor to the south will allow for continued use of the water storage dam for Austral bricks and assist in regularising the industrial area/development footprint.

Flooding

- 6) Further details and amendments need to be addressed as follows in accordance with the Flood Overlay Code.
 - a) Show a catchment plan of external upslope catchment and confirm that the ultimate development land uses as per the Rochedale Urban Community Neighbourhood Plan have been assumed.

- b) All rainfall data is to use the most up to date data from LIMB2020 (or newer where available), noting that datahub rainfall is obsolete in Brisbane.
- c) AR&R climate change provisions are to be included in the design flows based on intensity at year 2100 (4.5 or higher).
- d) Downstream boundary condition rating curve needs to be specified and compared against Bulimba Creek flood levels and joint probability analysis.
- e) The significant alteration to the waterway requires extreme floods to be modelled as the waterways are intended to convey all flood events.
- f) Provide an easement over waterway area

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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