



Dedicated to a better Brisbane

14 August 2026

Sims Group Australia Holdings Limited
C/- Planning Initiatives
PO Box 1774
NEW FARM QLD 4005

ATTENTION: Benjamin Cowan
Application Reference: A007053499
Address of Site: 69 TINGIRA ST PINKENBA QLD 4008

Dear Benjamin

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. This includes further information and amended plans in respect to air quality impacts, airport safeguarding, vegetation retention, waterway corridor impacts, verge and road layout requirements, and erosion and sediment control.

Air quality

- 1) The Air Quality Impact Assessment Report, 17264 R_2, dated 3/06/2026, prepared by Assured Environmental has been reviewed. The following information will be required to enable further assessment of the proposal against PO1 of the Industry code.

Fines Processing Plant and Wharf Operations

- a. Provide details of the proposed water misting system and demonstrate that it achieves an equivalent moisture content to conventional water spraying, consistent with the assumed 50% dust control efficiency.
- b. Provide further information describing the "covered bay" arrangement and identify the source/reference for the control efficiency adopted for this measure.
- c. Provide additional details of the truck load-out control measures, including whether the system remains enclosed between the discharge point and truck entry point during active loading. Also identify the reference source for the control efficiency applied. If the materials discharged are not in an enclosed system during discharge, it appears unreasonable to apply a 70% control efficiency for this activity.
- d. Provide justification for excluding metal pollutants from the assessment. If these pollutants are considered insignificant, this should be demonstrated and supported. The absence of source-specific data is not sufficient justification, as reasonable assumptions could be derived from the metal concentrations in fines and processed/unprocessed scrap materials.

Vehicle Movement on Paved Internal Roads, and Wharf Activities

- e. Provide the input values used for each parameter in the emission factor equations and identify the source of the control efficiencies applied. Clarify why these control efficiencies have been applied, particularly where emission reductions associated

with management measures may already be reflected through the adopted silt content values.

Ferrous Shredding Operations

- f. Provide the source/reference supporting the adoption of a 70% control efficiency for wet suppression. The NPI indicates a control efficiency of 50% for water spraying during loading operations. Justify the use of a higher control efficiency, and also describe how water suppression will be implemented for each fugitive dust emission source.
- g. Clarify whether the conveyors will be fully enclosed on all sides. While enclosure of conveyors can reduce emissions during material transport, it does not necessarily reduce emissions at transfer points. Accordingly, the application of a covered conveyor control efficiency to material transfers to the shredder and final product stockpile may not be appropriate unless the transfer points are also enclosed. Please review and justify the control efficiencies applied.
- h. Confirm whether a variable-height stacker will be used to minimise material drop heights during stockpiling. If not, provide details of the measures that will be implemented to minimise drop heights.

Wharf Activities

- i. Provide the source/reference for the control efficiency adopted for the enclosed diesel grab and hopper discharge to conveyor system. In addition, explain the basis for applying a 70% control efficiency to these material transfer operations where the transfer/discharge points are not fully enclosed.

Results

- j. The modelling results indicate exceedances of the relevant air quality criteria. While additional dust mitigation measures have been recommended, it is unclear whether these measures would be sufficient to achieve compliance, particularly as control efficiencies associated with wet suppression and water misting have already been incorporated into the modelled emission rates for most sources. The assessment is required to demonstrate that the development can comply with the relevant air quality criteria.
- k. Provide contour plots of the cumulative impacts including background.

Other

- l. Provide information outlining the assessment of potential air quality impacts from nearby industries, including the methodology, sources/activities, assumptions, etc.
- m. Provide the air quality model files.

Revised Noise Impact Assessment

- 2) Council has reviewed the Noise Impact Assessment prepared by AE (dated 4 June 2026). Notwithstanding the findings of the report, concerns remain regarding the potential for noise emissions from the proposed metal recycling and processing operation to adversely impact the amenity of the nearby residential areas. In particular, the proposed 24/7 operation, the site's proximity to sensitive receivers, the inherently impulsive, tonal and impact-related nature of the activities, and Council's history of noise complaints associated with the existing operation - which raise concerns as to whether all relevant noise sources and worst-case operating scenarios have been adequately assessed.

Council is therefore not satisfied that the report has sufficiently demonstrated compliance with the applicable noise criteria or that the operation can occur without causing unreasonable impacts on residents. Further, the conclusion that no additional noise mitigation measures or operational restrictions are required has not been adequately

justified. Accordingly, a revised Noise Impact Assessment is required that addresses the following:

- a. Demonstrate compliance with all applicable Council noise criteria under PO2 of the *Industry Code*, not only the criteria contained in Table 9.3.12.3.G.
- b. Assess the cumulative noise impacts from all operational components, including both wharf-based and land-based activities.
- c. Provide a summary table of all noise modelling assumptions and calculations, including source noise levels, attenuation factors, separation distances, barrier/shielding effects, meteorological conditions, reverberation effects and any other adopted noise reduction factors.
- d. Clarify all vehicle-related noise sources included in the modelling, including # heavy vehicle movements & type (e.g. LRVs, tractors and B-Doubles), reversing alarms, air-brake releases, and loading and unloading activities.
- e. Confirm that all other possible operational and intermittent noise sources have been assessed and incorporated into the modelling, including, where relevant:
 - i. metal handling and dropping activities into bins, stockpiles, vessels and ships;
 - ii. vehicle crushing and compaction activities;
 - iii. shredder hammer impacts and associated processing equipment;
 - iv. machinery horns, sirens, public address systems and amplification devices;
 - v. generators and auxiliary plant;
 - vi. processing or crushing of gas cylinders, tanks or similar materials capable of generating impulsive noise; and
 - vii. any other impulsive, tonal or intermittent noise sources associated with the operation.
- f. Clarify whether the results presented in Table 17 relate to both Stage 1A and Stage 1B, noting the table appears to reference Stage 1B only.
- g. Assess noise impacts during peak operating conditions and realistic worst-case scenarios, including periods of increased production, equipment congestion, high-demand operations and other abnormal or the termed "upset conditions".
- h. Include noise generated by ancillary maintenance, servicing and repair activities associated with vehicles, plant, bins and machinery as per the areas shown on the plans.
- i. Provide revised noise contour mapping for all relevant operational scenarios.
- j. Investigate and consider additional noise mitigation measures and management controls to further minimise impacts on nearby residents, particularly during evening and night-time periods. This should include consideration of activity staging, operational curfews, resident respite periods, acoustic shielding or enclosure of noise sources, and restricting the higher-noise activities to daytime hours where possible.

Airport environs

- 3) The site is located within several sub-categories of the *Airport Environs Overlay* and is undertaking activities (air emissions, hazards, wildlife) that may impact on the safe operation of the Brisbane Airport.
 - a. The following further information is therefore required:

- i. The proposed development will not achieve AO2 of the *Airport Environs Overlay Code* therefore compliance with PO2 is required, which includes assurances from Brisbane Airport Corporation and the Civil Aviation Safety Authority (CASA). Complete and submit Form 1247 to CASA and the filled-out form and outcome of the plume rise assessment by CASA submitted to Council.
- ii. Demonstrate compliance with AO4.2 which ensures development involving landscaping or drainage works, including artificial water bodies located within the distance from airport 0-3km sub-category, are designed and installed to minimise the potential to attract birds and bats.

Hazard & Risk - Industrial Amenity Overlay Code

- 4) Council has reviewed the Hazard and Risk Assessment Report prepared by EPIC dated 3 June 2026. While it appears the quantities of dangerous goods proposed on the site do not exceed AO3 of the *Industry Code*, Council acknowledges the report's intent in outlining the proposed dangerous goods inventory and some associated risks.

However, as the site is located within the Industrial hazard investigation area sub-category of the Overlay, the proposal must be assessed against the relevant provisions in PO4 of the Code. The Code seeks to ensure that:

“Development for new premises within the Industrial hazard investigation area sub-category is compatible with existing declared major hazard facilities and facilities storing 10% or more of the major hazard facility quantity threshold and does not adversely impact on the continued operation of those existing uses.”

- a. Accordingly, a revised or supplementary assessment is required that specifically addresses PO4 of the *Industrial Amenity Overlay Code* and demonstrates compliance with the intent and outcomes of the Code.

Chemical Hazard Flood Risk Report

- 5) The Flood Risk Assessment by SLR dated 21 April 2026 has been reviewed. It is stated in Section 3.6 *Hazardous Materials* of the Report, that quantities of hazardous chemicals will not exceed the threshold quantities listed in both Table 8.2.11.3.M of the *Flood Overlay Code* and Table 8.2.6.3.J of the *Coastal Hazard Overlay Code*. In reviewing the *Hazardous Materials Storage and Inventory* in Table 3 of the EPIC Report, quantities of Class 3 PGIII (ULS Diesel 40,000L) exceed Column 5 of the *Work Health and Safety Regulation 2011* and the goods also exceed the “Acute” and/or “Chronic” aquatic environment category limits as also stated in the chemical threshold Tables. Additionally, the use/s are considered to be processes that require additional assessment as outlined in Table 8.2.11.3.H and Table 8.2.6.3.F of the Codes [ie Sewage/Water treatment, Waste disposal activity (other than waste incinerator), including waste transfer station operation and Storage of hazardous chemicals in quantities exceeding the hazardous chemicals flood hazard threshold in Table 8.2.6.3.J].
 - a. A Chemical Hazards Flood Risk Report prepared in accordance with the *Management of Hazardous Chemicals in Flood Affected Areas Planning Scheme Policy* as per PO16 & PO8 of said Codes is therefore required and not submitted later as part of the detailed design phase.

Stormwater Quality Management

- 6) The Stormwater Management Plan by ENV Solutions dated 26 May 2026 has been reviewed. Council notes that in Section 4.3 *Process Water Quality Management (Stage 1B)* a treatment system is proposed to treat the contaminated stormwater run-off from the “dirty” or process areas. Whilst DETSI discharge limits have been provided, Council needs to ensure any discharge to stormwater aligns with its own criteria.
 - a. Confirm and/or demonstrate that the treated/processed water will comply with the limits as prescribed in Section 7.9.3 *Permanent methods of water quality control* in

the *Infrastructure Design Planning Scheme Policy*, where any of the final “treated” water discharges to ground or stormwater.

- b. Provide a copy of the electronic MUSIC Modelling File used to model the pollutant quality % reductions as outlined in the report.

Diesel Storage and Dispensing

- 7) The Plans and Hazard and Risk Assessment Report prepared by EPIC indicate that a 40,000 L aboveground self-bunded diesel storage tank is proposed. However, limited information has been provided regarding the tank specifications, its intended safe operation, and the proposed spill and leak containment measures.
 - a. Provide sufficient information to demonstrate the following:
 - i. Compliance with PO9/AO9 and PO10/AO10 of the *Industry Code*, including the relevant requirements of the associated *Storage and Dispensing of Petroleum Products Planning Scheme Policy* and *AS1940*.
 - ii. Detailed scaled plans and specifications for the fuel storage and refuelling infrastructure/pad, including:
 - ☐ bunding arrangements;
 - ☐ impervious surface materials;
 - ☐ grading and drainage design;
 - ☐ drainage lines and subsurface pipework;
 - ☐ tank leak detection systems;
 - ☐ roofing/canopy structures; and
 - ☐ spill containment infrastructure.
 - b. Provide details of the proposed spill and leak containment measures, incorporating one or more of the following compliant options:
 - ☐ **Option 1**
Provision of a bunded and graded refuelling pad that drains to a blind sump, sized to contain the spill volume of the largest compartment of the fuel tanker servicing the site. An automatic diversion valve must be installed to direct fuel spills and leaks to the blind sump during refuelling and fuel delivery operations, while allowing passive stormwater drainage outside these periods.
 - ☐ **Option 2**
Provision of a bunded and graded refuelling area that drains to a Council accepted hydrocarbon separator system. The system must be designed to contain the spill volume from the largest compartment of the fuel tanker servicing the site. The hydrocarbon separator may connect to the stormwater drainage system, if applicable.
 - ☐ **Option 3**
Provision of a roofed, bunded and graded refuelling area that passively drains to a blind sump that is not connected to the sewer or stormwater network. The blind sump must be sized to contain the spill volume of the largest compartment of the fuel tanker servicing the site, including an allowance for wind-blown rainfall.

[The rainfall allowance may be calculated using the following formula $V_r = 0.005 \times 3 \times P_o$, where V_r = wind-blown rainfall allowance (m³) and P_o = total length of the open perimeter of the canopy (m)].

Contaminated Land – Filling & Excavation Code

- 8) The site is listed on the Environmental Management Register (EMR) as per the DETSI EMR Search Response dated 3 November 2022. In the response to PO11 of the *Filling & Excavation Code* it states “Where excavation is required, it will be undertaken in accordance with the relevant Environment Management Plan”. An EMP is not a recognised strategy/document when identifying possible contaminants, managing

potentially contaminated sites or when listed on the EMR/CLR. Council therefore requests that a Suitably Qualified Person (SQP) is engaged to ensure the site will be managed in accordance with PO11 of the Code and the State legislative requirements.

(This is of particular importance if any of the site is to be granted or dedicated to Council).

Tree removal

- 9) The proposed removal of NALL-protected significant trees is not supported. Based on the information provided, it appears that the proposed development could be accommodated through a more considered site layout and redesign of the truck parking, car parking and storage areas, thereby avoiding the need for tree removal.

The justification for the removal of Trees T1, T9 and T10 is unclear, as these trees are located within proposed landscape areas and appear capable of being retained and incorporated into the landscape design. In addition, several existing trees and vegetation near the proposed eastern car park exit have not been clearly identified on the submitted plans and should also be retained within landscaped areas.

The existing vegetation along the Tingira Street frontage and Tree T2 contribute to the site's landscape character and should be retained and integrated into the car park design. Retention of this vegetation would assist in maintaining the established streetscape, provide visual screening and shade, and reduce the overall impact of the proposed development.

- a. Provide amended plans demonstrating the retention and protection of Trees T1, T2, T3, T4, T6, T7, T9 and T10, as well as all existing vegetation along the Tingira Street frontage. The revised design should clearly show how parking, storage and vehicle circulation areas have been reconfigured to avoid impacts on these trees and vegetation.

Waterway corridors overlay

- 10) The proposed extension of the existing port is within the Brisbane River corridor sub-category – Section 5 of the Waterway corridors overlay, triggering assessment against sections A & D of the Waterway corridors overlay code. Whilst it is acknowledged that this aspect of the development has been referred to SARA, referral to the SARA does not remove the requirement to assess the development against the applicable provisions of the local planning scheme.

From aerial imagery it appears that the extension to the port works have already begun which has resulted in the removal of some vegetation. Aerial imagery also shows that vegetation is present in close proximity to the proposed port extension. As such, the extent of impacts to vegetation is unclear.

To ensure that development complies with the Waterway corridors overlay code, the development is required to avoid or minimise clearing of riparian, native and significant vegetation and limits any clearing and disturbance to only the extent and location reasonably necessary for the use (PO1).

- a. Provide an assessment against Section A and Section D of the Waterway Corridors Overlay Code including:
 - i. A Vegetation Retention Plan which identifies all vegetation within the Waterway corridor overlay area (including the location and extent of marine vegetation). The plan must show the proposed development including all services/infrastructure and clearly show the full extent of all earthworks (cut/fill) required during construction of the development. The plan must clearly identify all vegetation to be retained and all vegetation to be removed and include the following information:
 - ☐ Scientific name;

- ☐ Height;
 - ☐ Diameter of tree trunk at breast height (DBH);
 - ☐ Crown diameter;
 - ☐ Habitat features including hollows and scratch marks, nests etc.
 - ☐ Notional Root Zones (NRZs) (in accordance with AS4970); and
 - ☐ General health assessment.
- ii. If works encroach into the NRZs of any trees identified to be retained, a report from a qualified arborist (AQF level 5 Arboriculture) is required to demonstrate no negative impacts on the long-term health of the trees.

Carpark exit to Tingira Street

- 11) The proposed carpark exit to Tingira Street requires the removal of an existing street tree. However, the proposed works also appear to conflict with existing gas and electrical utilities within the verge. Provide detailed plans showing:
- a. The exact location and extent of all existing underground services, including gas and electrical infrastructure.
 - b. The relationship of these services to the proposed driveway and street tree removal works.
 - c. Any proposed service relocations, protection measures, or adjustments required to accommodate the development.
 - d. Details of the proposed tree replacement, including species, size, and planting location, if removal of the existing street tree is approved.

Verge width

- 12) The verge along the site's frontage to Soutter Street, including the corner intersection with Tingira Street, does not achieve the minimum 3.75m verge width required under the Streetscape hierarchy overlay code for an Industry Street. Provide amended plans demonstrating:
- a. a continuous minimum verge width of 3.75 m along the relevant frontages. Where necessary, plans should also identify and dimension any linear land dedication required to achieve compliance with the prescribed verge width;
 - b. any trees within the land dedication retained as a street tree.

Corner truncation

- 13) A 10m x 10m 5 chord truncation is required at the corner of Tingira Street and Soutter Street, in accordance with PO3 of the Road hierarchy overlay code.
- a. Provide amended plans detailing the provision of a corner truncation.

Erosion

- 14) To address PO13, PO14 and PO15 of the Stormwater code, an Erosion Hazard Assessment form is to be provided.
- a. Prepare and submit an Erosion Hazard Assessment form.

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

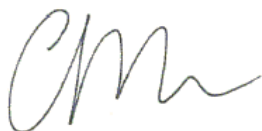
Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

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 A007053499.

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

Yours sincerely



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Development Services
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