



Our Ref: 21-350  
20 May 2026

Chief Executive Officer  
Brisbane City Council  
GPO Box 1434  
BRISBANE QLD 4000

Dear Diana,

**RESPONSE TO INFORMATION REQUEST – A006972961  
104 BANDARA STREET, RICHLANDS**

We refer to Council's Information Request dated 17 April 2026 and respond to the issues raised as follows.

**Inclusion of Warehouse Use**

In further discussions with Council, it has been determined that the most appropriate path forward is to include a Warehouse use in the subject application.

The majority of the site is intended to operate as a Warehouse, and construction on site is reflective of the Warehouse approval, the most recent version being A006815928 issued by Council on 17 October 2025.

Including a Warehouse under this application will allow a single approval to ultimately be "in-effect" over the site.

We confirm that inclusion of a Warehouse use does not change the assessment process in accordance with Section 26 of the DA Rules. We consider that inclusion of this use is in context of the matters raised in Council's Information Request and ensures that the proposed Medium Impact Industry use for Dangerous Goods Storage can be assessed in the manner intended.

**Hazardous Materials**

- 1) *The provided Dangerous Goods Report does not provide sufficient information for assessment. The following matters must be addressed in a revised report:*
  - a) *There is inconsistent information between Tables 5, 6, 7 and 9 regarding the classes and quantities.*
    - i. *Provide one table only, being an inventory of all chemicals stored, and refer to a plan detailing the locations of storage areas. It is acknowledged that the plans identify a "Dangerous Goods Store"; however, the report refers to products across the whole site.*

- b) *Include information about storage areas in the remainder of the warehouse and whether only Class 9 products are stored in the main warehouse. Any additional storage areas not mentioned in the report, which are assumed to be low-level/below threshold, must be included in the inventory, as the whole building is relevant for the storage.*
- c) *Provide the quantities proposed to be stored for each packaging group within the classes mentioned in the report. A quantity description cannot be provided across two packaging groups.*
- d) *Provide Safety Data Sheets (SDS) for each product to assess Schedule 15 of the Work Health and Safety Regulation and determine whether the use constitutes a Hazardous Chemicals Facility. This is particularly relevant for Class 9 products, products that fall within the category of poisonous or toxic substances, and products with particular Hazchem codes. Assessment against Schedule 15 is relevant to the industrial planning use determination in Table SC1.1.3.A—Industry thresholds (City Plan 2014), and to the determination of assessable development under the Planning Regulation 2017, Schedule 10 (Development assessment), Part 7 (Hazardous chemical facilities). The definition of a hazardous chemical facility is provided in the Planning Regulation 2017, Schedule 24 (Definitions).*
- e) *Clarify the intent of the “small amounts of alcohol and oils” in Section 2.5 of the report and ensure the inventory captures these products. If Section 2.5 is intended to be supplementary (i.e., to describe the flammable liquid (Class 3) products and types of storage), please confirm this. The applicant is advised that all product descriptions will be reviewed in the requested SDS. If the “small amounts of alcohol and oils” referenced in Section 2.5 are products that fall outside the chemicals described in the report (the inventory), ensure they are included in the inventory.*

### **Response:**

A Dangerous Goods Report and Preliminary Hazard Analysis Report are provided. Prepared by Acor Consultants, which address the items outlined above.

### **Refuse**

- 2) *A review of the proposed plan has identified that the proposed refuse solution has not been increased in size to cater for the change of use from Warehouse to Industry use. The development's refuse solution is required to provide sufficient storage capacity and source separation to cater for industry waste generation. In accordance with PO17/AO17.2 of the Industry code and PO8/AO8.1 and AO8.2 of the Infrastructure design code, demonstrate the following:*
  - a) *Provide amended architectural plans that clearly demonstrate the development's 'Screened Refuse' enclosure has been increased in size and provides a minimum GFA of 30m<sup>2</sup> (internal dimensions of 10m × 3m) to house four (4) × 4,500L front-lift bulk bins.*

OR

- b) *Alternatively, provide amended architectural plans that clearly demonstrate an additional indicative 'refuse storage' location within the building, with a minimum GFA of 15m<sup>2</sup> (dimensions of 5m × 3m), to store an additional two (2) × 4,500L front-lift bulk bins.*

The proposal at hand is for a Medium Impact Industry use for dangerous goods storage. The site will operate as originally intended, being for a Warehouse storage use.

The Medium Impact Industry component seeking approval is for storage only and will have no influence on the refuse generation proposed. There is therefore no requirement to increase the previously approved refuse storage area.

**Response:**

- 3) *The proposed plans show that the previously approved pump room (Ref: A006815928) has been revised to a pump; however, no amended elevations have been provided.*
- a) *Provide additional information and amended plans confirming whether there are any changes to the elevations.*
- b) *Provide all elevations as part of this application for assessment and approval.*

**Response:**

Updated plans are being prepared and will be provided upon completion, however there is confirmed as no significant changes to the built form previously approved under A006815928.

This letter represents a full response to Council's Information Request in accordance with the Development Assessment Rules and the end of the applicant's response period.

We will now be commencing public notification.

Should you require any further clarification or additional information please do not hesitate in contacting the undersigned.

**Yours faithfully,  
Plan A Town Planning Pty Ltd**



**Matt Geyle  
Director**