

21 September 2026

BCC Reference: A006512843

Our Reference: 2729

The Chief Executive Officer
Brisbane City Council
GPO Box 1434
Brisbane, QLD, 4001

Via Email: DSPlanningSupport@brisbane.qld.gov.au
Kellie.hilton@brisbane.qld.gov.au

ADDENDUM TO RESPONSE TO INFORMATION REQUEST

MATERIAL CHANGE OF USE FOR HIGH IMPACT INDUSTRY (FUEL BURNING) 11 INTERCHANGE PL ROCHEDALE QLD 4123 DESCRIBED AS: LOT 1 ON SP288046

Dear Kellie,

We refer to Council's Information Request dated 01 June 2026 made under the *Planning Act 2016* and to our response to that request dated 7 July 2026. This letter is provided as an addendum to our response dated 7 July 2026.

Council's Information Request identified that the air quality information previously submitted did not adequately demonstrate good air quality modelling practice in accordance with Section 7 of the Air Quality Planning Scheme Policy (AQ PSP) under City Plan 2000, and did not present the maximum predicted concentrations against the criteria in Table 3 of that policy.

In recognition of this, the Applicant has engaged Vipac Engineers and Scientists Limited (Vipac) to prepare a new and independent quantitative air quality impact assessment of the proposed back-up diesel generator.

The Vipac *Air Quality Assessment* (Ref: 70B-26-0345-TRP-165850-1, Revision 01, dated 19 September 2026) is provided within Attachment 1 and supersedes the JT Environmental air quality assessment provided as Attachment 1 to our response dated 7 July 2026. The assessment has been prepared from first principles, adopts the criteria of the AQ PSP under City Plan 2000, and directly responds to each of the matters raised by Council.

The development context and the response to Item 2 (Noise) set out in our response dated 7 July 2026, including the Palmer Acoustics assessment, remain unchanged and continue to form part of the response to the Information Request.

1.0 INFORMATION REQUESTED:

Air Quality

1. *The response to Council's Further Information Request, dated 18/05/2026, has been reviewed in addition to the model files submitted on 14/04/2026. However, the outstanding issues remain unresolved and have not been satisfactorily addressed. To meet the requirements of the Air Quality Planning Scheme Policy (AQ PSP) under City Plan 2000, please provide the following information:*

- a) Provide the outstanding details previously requested and demonstrate good air quality modelling practices in accordance with Section 7 of the AQ PSP. This should include, but not be limited to, detailed justification of emission parameters, selection and identification of representative meteorological data, consideration of terrain effects, and assessment of building wake effects. While JT Environmental has stated that building wake effects have been considered and emission parameters can be identified within the model files, the remaining supporting information has not been provided. Please also include the basis and justification for the assumed emission parameters. It is noted that the surface file relates to meteorological inputs rather than terrain data, and review of the model files indicates that terrain has not been incorporated, with a flat topography assumed across the modelling domain.*
- b) Provide the maximum results for both the predicted concentrations for all areas and for sensitive receiving environment and compare them against the criteria in Table 3.*
- c) Provide the air quality model files if any amendments are made.*

Response:

The Vipac assessment provided within **Attachment 1** has been prepared in response to this item. A response to each part of the request is provided below.

Item 1(a) – Good Air Quality Modelling Practice**Selection and Identification of Representative Meteorological Data**

It is understood that Vipac have reviewed several years of meteorological data from the nearest open long-term Bureau of Meteorology station at Archerfield Airport (Station 040211), approximately 11 km west of the site. Each year was compared against the five-year average for wind direction frequency, wind speed and temperature. The 2021 calendar year was found to most closely match the five-year average and was adopted as the representative year.

It is understood that the Vipac assessment incorporates more detailed terrain data as well as more conservative building wake effects in their modelling.

Therefore, it is considered that the revised report represents a significant improvement with regard to the good air quality modelling practices.

Item 1(b) – Maximum Results Compared with Table 3

The revised assessment adopts the Table 3 criteria of the AQ PSP (City Plan 2000) directly. Each of the 11 receptors have been classified under the AQ PSP predictions are reported against the design ground level concentrations for sensitive receiving environments, the goals for all areas, and the City Plan 2014 criteria.

The maximum predicted concentrations of every pollutant comply with the Table 3 design ground level concentrations for sensitive receiving environments, with the Table 3 goals for all areas, and with the City Plan 2014 criteria, both in isolation and inclusive of background. This is the case even though the generator has been modelled operating continuously.

Reference is made to table in 7.1 model predictions which takes consideration to the assessment criteria derived from Table 3 of the City Plan 2000 AQSP.

Item 1(c) – Model Files

The air quality modelling has been fully revised. The complete model files for the Vipac assessment, including the TAPM, CALMET (with terrain and land use inputs) and CALPUFF input and output files, are provided within **Attachment 2**.

2.0 CONCLUSION:

This addendum supplements our response dated 7 July 2026 to Council's Information Request dated 01 June 2026. It provides a new, independent air quality impact assessment prepared by Vipac Engineers and Scientists Limited in response to Item 1.

The Vipac assessment addresses the deficiencies identified by Council in the previous modelling. In particular it:

- justifies all emission parameters with reference to manufacturer data and published emission limits;
- selects and documents a representative meteorological year;
- incorporates terrain and building wake effects; and
- reports maximum predicted concentrations for both sensitive receiving environments and all areas against the Table 3 criteria of the AQ PSP (City Plan 2000).

Although the generator has been modelled operating continuously, rather than for its expected use of about 15 hours per year, the maximum predicted concentrations of all pollutants comply with the Table 3 criteria for sensitive receiving environments and for all areas, both in isolation and with background.

It is considered that Item 1 of the Information Request has been satisfactorily addressed. Together with our response dated 7 July 2026, the proposed development demonstrates compliance with the applicable assessment benchmarks and is supportable by way of the issuance of a development permit.

Please do not hesitate to contact our offices should you have any questions or require further information.



Liam Holliday
PLANNING INITIATIVES