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45, 45A, 45D, & 45E Eagle Street, Brisbane City QLD 4000

Town Planning Report

Prepared for Dexus Funds
Management Ltd

Disclaimer

This report has been prepared in accordance with the scope of services described in the contract or agreement between Place Design Group Pty Ltd ACN 082 370063 and the Client. The report relies upon data, surveys, measurements and results taken at or under the particular times and conditions specified herein. Any findings, conclusions or recommendations only apply to the aforementioned circumstances and no greater reliance should be assumed or drawn by the Client. Furthermore, the report has been prepared solely for use by the Client and Place Design Group accepts no responsibility for its use by other parties.

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Table 1: Issue History			
Document Title	Version	Date Issued	Issued To
Draft Town Planning Report	1	18/06/2026	Internal
Draft Town Planning Report	2	23/07/2026	Client
Final Town Planning Report	3	02/10/2026	Council

Applicant Details

Table 2: Applicant Details	
Applicant	Dexus Funds Management Ltd c/- Place Design Group Pty Ltd Level 3/ 109 Edward Street, Brisbane City Queensland, 4000
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Executive Summary

This Town Planning Report, prepared by Place Design Group, is made to Brisbane City Council (**Council**) on behalf of Dexus Funds Management Ltd (**Applicant**), in support of an impact assessable development application over land at 45, 45A, 45D, & 45E Eagle Street Brisbane City Queensland 4000, more formally described as Lot 50 on RP817615, Lot 9 on SL12596, Lot 100 on SP314779, and Lot 110 on SP314779 (**subject site**).

Made under section 51 of the *Planning Act 2016* (**the Act**), this DA seeks a Development Permit for a Material Change of Use for High Impact Industry (Standby Power Generator) (**proposed development**) and is subject to Impact assessment pursuant to Table 5.5.7 of the *Brisbane City Plan 2014* (*version 37, effective 18 September 2026*) (**the City Plan**).

The proposed development involves the installation of four (4) standby diesel power generators which are to support activities within the approved commercial towers as part of the waterfront development (**Council Reference: A006826222**). The proposed generators will be located within the plant room on level 19 of the approved north tower, with two (2) bulk diesel storage tanks to be located within basement level B3 of both the northern and southern towers and four (4) Day Tanks on Level 19 of the north tower. Notably, the proposed development does not involve changes to the approved built form, access arrangements or servicing infrastructure associated with the broader waterfront approval.

The proposed generators are intended to operate only during emergency power outages and for limited routine testing and maintenance. They are designed to support the safe, reliable and continuous operation of the commercial building, ensuring the reliability of essential building services.

A comprehensive assessment of the proposed development has been undertaken against the relevant statutory planning framework, including the Act, State Planning Policy, and the planning scheme. The proposed development is consistent with the intent of the Principal centre zone and the City Centre neighbourhood plan, supporting the ongoing function of the CBD as a key economic and business hub.

This assessment is supported by additional technical documentation including a Noise Impact Assessment and an Air Quality Assessment, demonstrating the proposed development does not impact upon the safety or amenity of surrounding uses and public spaces, reinforcing its compliance with the planning scheme.

In view of the above, it is recommended Council favourably considers the proposed development and approve the development application, subject to reasonable and relevant conditions.

A summary of the site details is provided within the **Table 3** overleaf.

Table 3: Application Summary

Site Address	45, 45A, 45D, & 45E Eagle Street, Brisbane City QLD 4000	
Real Property Description	Lot 50 on RP817615 Lot 9 on SL12596 Lot 100 on SP314779 Lot 110 on SP314779	
Total Site Area	9,370m ²	
Landowner(s)	Lot	Landowner
	Lot 50 on RP817615	Dexus Funds Management Ltd A.C.N. 060 920 783 (Dexus) as trustee under instrument no. 716835634
	Lot 9 on SL12596	DNRMMRRD, Dexus as lessee
	Lot 100 on SP314779	Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development (DNRMMRRD), Dexus as lessee
	Lot 110 on SP314779	DNRMMRRD, Brisbane City Council as lessee
Planning Scheme	Brisbane City Plan 2014 (v37, effective 18 September 2026)	
Zoning	PC1 Principal Centre (City centre) zone	
Local Plan	City centre neighbourhood plan – River precinct (NPP-004)	
Overlays	Airport environs overlay – OLS – Horizontal limitation surface boundary – Procedures for air navigation surfaces (PANS) – BBS zone – Distance from airport 8-13km Bicycle network overlay – Primary cycle route – Secondary cycle route – Local cycle route – Riverwalk – Typology 1 (City reaches north and south) Coastal hazard overlay – Coastal management district sub-category – Erosion prone area - coastal erosion sub-category – Erosion prone area - permanent inundation due to sea level rise at 2100 sub-category	
	Flood overlay – Brisbane River flood planning area 1 sub-category – Brisbane River flood planning area 2a sub-category – Brisbane River flood planning area 2b sub-category – Brisbane River flood planning area 3 sub-category – Brisbane River flood planning area 4 sub-category – Brisbane River flood planning area 5 sub-category Heritage overlay – Local heritage place sub-category – State heritage place sub-category – Area adjoining heritage sub-category Potential and actual acid sulfate soils overlay – Land at or below 5m AHD sub-category – Land above 5m AHD and below 20m AHD sub-category Road hierarchy overlay	

Table 3: Application Summary

	– High storm-tide inundation area sub-category – Medium storm-tide inundation area sub-category Community purposes network overlay Critical infrastructure and movement network overlay – Critical assets sub-category – Critical infrastructure and movement planning area sub-category	– Neighbourhood road – Streetscape hierarchy overlay – Locality street Waterway corridors overlay – Brisbane River corridor sub-category
Relevant State Matters	SEQ Regional Plan land use categories – Urban footprint Coastal Protection – Coastal management district – Coastal area – erosion prone area – Coastal area – medium storm tide inundation area Fish habitat areas – Major (tidal)	Maritime safety and development – Navigable waterways – Developed marina or state boat harbour area Public passenger transport facilities – Public passenger transport facility Excluded area – Threshold exemption area
Development Proposal	Development Permit for a Material Change of Use for High Impact Industry (Standby Power Generator)	

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Attachments

Table 4: List of Attachments

Attachment	Provided by:
1. DA Form 1	Place Design Group
2. Property Searches	Place Design Group
3. Landowner's Consent	– The Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development – Brisbane City Council – Dexu Funds Management Ltd
4. Proposed Plans	KME Services Pty Ltd
5. Technical Assessment Report & Plans	KME Services Pty Ltd
6. Noise Impact Assessment	Stantec
7. Air Quality Assessment	MWA Environmental
8. City Plan Code Responses	Place Design Group

1 Introduction

This report has been prepared by Place Design Group, on behalf of *Dexus Funds Management Ltd* (**the Applicant**), in support of a development application seeking a Development Permit for a Material Change of Use for High Impact Industry (Standby Power Generator) over land at 45, 45A, 45D, & 45E Eagle Street Brisbane City, more formally described as Lot 50 on RP817615, Lot 9 on SL12596, Lot 100 on SP314779, and Lot 110 on SP314779 (**subject site**).

The development will provide four (4) diesel powered standby generator sets to provide emergency electrical supply to essential building systems in the approved commercial waterfront towers over the site. The proposed power generators will only operate during power outages or periodic maintenance testing and are not intended for continuous or prime power operation. The proposed power generators will be powered by diesel fuel tank system containing a maximum combined 87,000L of diesel fuel stored on site.

The generators and diesel tanks will be installed within the building plant room on level 19 of the approved north tower and the B3 basement levels of the north and south towers, which have been approved by Brisbane City Council (**Council**) on 10 December 2025 (**Council Reference: A006826222**).

The subject site is situated within the Principal centre (city centre) zone and the City Centre neighbourhood plan (River precinct NPP-004) of the City Plan. The proposed development is designed in a manner which ensures the amenity and safety of the surrounding area is maintained. Importantly, it also aligns with the intention for development within the CBD, supporting the reliability of operations of the approved commercial towers.

This report addresses the merits of the proposed development with respect to the provisions of the statutory requirements, specifically the City Plan and the relevant components of the Act. This development application is subject to **Impact Assessment** pursuant to Table 5.5.7—Principal centre zone of the City Plan.

2 Site Characteristics and Context

2.1 Site Characteristics

2.1.1 Location and Property Description

The registered address for the premises is 45, 45A, 45D, & 45E Eagle Street Brisbane City, more formally described as Lot 50 on RP817615, Lot 9 on SL12596, Lot 100 on SP314779, and Lot 110 on SP314779. The site comprises an irregular shaped allotment, with a total site area of 9,370m² (see **Figure 1**).



Figure 1: Aerial Image of Subject Site (Source: QLD Globe, 2026)*Development History*

2.1.2 Landowner's Consent

The landowners for each of lot subject to this development application are identified in **Table 5** below. Title Searches are provided within **Attachment 2** which identifies the relevant landowners are Brisbane City Council, Dexu Funds Management Limited and DNRMMRRD. Consent has been obtained from the relevant parties and is provided within **Attachment 3**.

Table 5: Landowner Details

Real Property Description	Registered Landowner
Lot 50 on RP817615	Owed by: Dexus Funds Management Limited A.C.N 060 920 783 as Trustee under Instrument No. 716835638
Lot 100 on SP314779	Owed by: The Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development Leased by: Dexus Funds Management Limited A.C.N 060 920 783 as Trustee under Instrument No. 716835638
Lot 110 on SP314779	Owed by: The Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development Leased by: Brisbane City Council Subleased by: Dexus Funds Management Limited A.C.N 060 920 783 as Trustee under Instrument No. 716835638
Lot 9 on SL12596	Owed by: The Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development Leased by: Dexus Funds Management Limited A.C.N 060 920 783 as Trustee under Instrument No. 716835638

2.1.3 Tenure, Easements, and Encumbrances

The site is affected by several easements and leases identified in **Table 6** below and the property searches provided within **Attachment 2**. The proposed development will be located within the approved building footprint of the commercial towers and does not present any impacts on the functionality or access to easements.

Table 6: Easement Details

Easement no.	Benefitting	Burdening	Purpose
Easement A on RP229737	Brisbane City Council	Lot 50 on RP817615	Underground piped drainage
Easement AA on SP121084	Riparian Plaza	Lot 50 on RP817615	Vehicular and pedestrian access
Easement C on RP229744	NA	NA	NA Note: This easement is to be extinguished as part of a historic development approval over the site (Council Reference: A005477682)
Easement D on RP229744	NA	NA	NA Note: This easement is to be extinguished as part of a historic development approval over the site (Council Reference: A005477682)

2.1.4 Access

No changes are proposed to the approved access arrangements under the historic development approvals.

The proposed diesel fuel tanks are to be refilled via the diesel fill point located within the approved north tower (see **Figure 2** below). The proposed diesel fill point can be appropriately accessed via the required service vehicles.

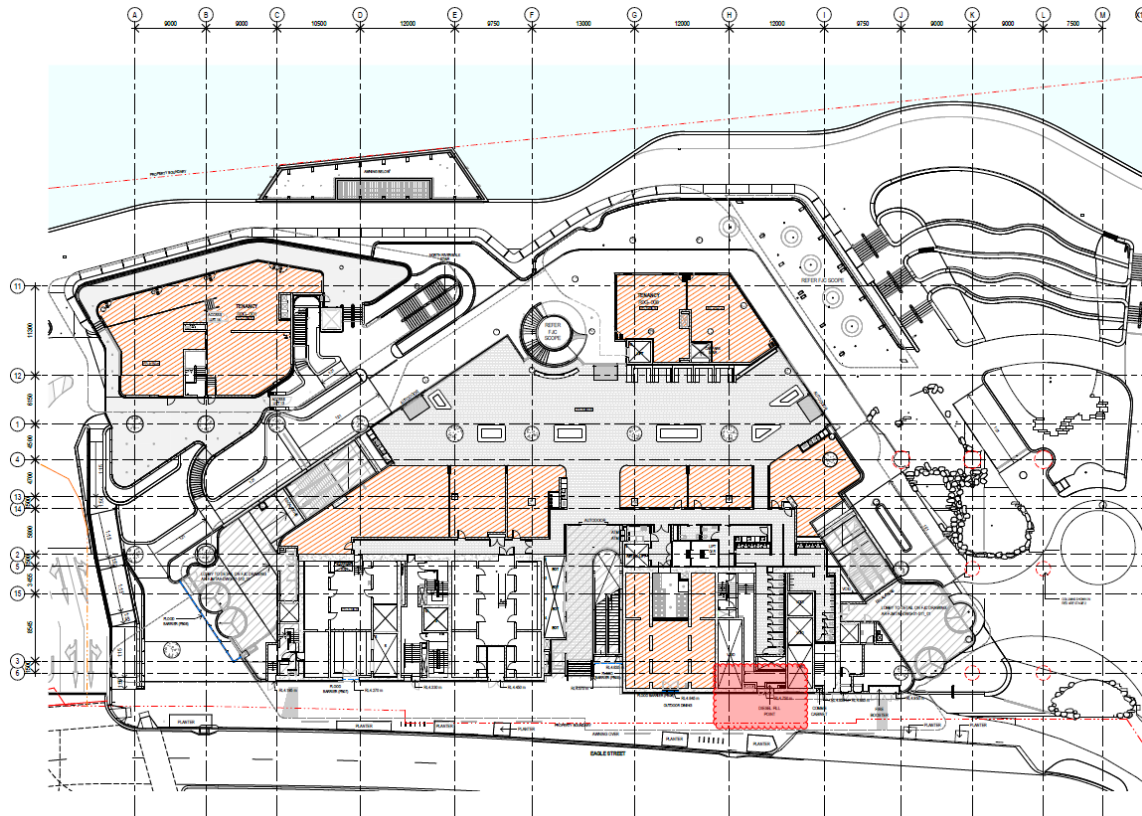


Figure 2: Proposed Diesel Fill Location (Source: Arkhefield, 2026)

2.1.5 Services & Infrastructure

No changes are proposed to the approved servicing arrangement under the most recent development approval (**Council Reference: A006826222**).

The proposed development will improve the integrity, resilience, and reliability of services supporting the operations and activities occurring within the approved commercial towers. It will offer a backup power supply in the rare event of a power outage to ensure the building remains safe and well-serviced during all potential circumstances.

2.1.6 Topography and Vegetation

Filling or excavation is not required as part of the proposed development nor is the removal of vegetation over the site. As such, the proposed development maintains the existing and approved levels of the site in accordance with the development approvals for the waterfront development (**Council Reference: A006826222**).

2.1.7 Contaminated Land

In accordance with the requirements of the *Queensland Environmental Protection Act 1994* (EPA) the Department of Environment and Science (DES) maintains a register of sites identified as having previous or current notifiable

activities or which are contaminated by hazardous materials. The Environmental Management Register (**EMR**) identifies 'low-risk' sites that have been used for an activity which is likely to cause land contamination, while the Contaminated Land Register (**CLR**) identifies 'risk' sites as requiring remediation.

The subject site is not included within the CLR or EMR and does not involve disturbances to soils over the site.

3 Approval History and Relevant Development Approvals

Table 5 identifies the relevant approvals over the premises, that relate to the waterfront development currently under construction.

The original development application for the waterfront development and commercial towers was approved by Council on 17 December 2020 (**Council Reference: A005477682**) and has since been subject to several minor changes, with the most recent approved on 10 December 2025 (**Council reference: A006826222**).

The proposed power generators will be located on level 19 of the north tower, with the two (2) supporting diesel tanks located basement level B3 of the towers (refer to the proposed plans within **Attachment 4**).

Table 5: Previous Approvals and Applications		
Application Reference	Description of Development	Date of Approval
Tower Approval (DA2)		
A006826222	Change Application (minor change) to Development Permit to Carry Out Building Work; Carry Out Operational Work; Material Change of Use for Filling and/or Excavation; Prescribed Tidal Work; bar; food and drink outlet; function facility; hotel; indoor sport and recreation; office; shop;	10/12/2025
A006466402 (Minor Change 2)	Change Application (minor change) to Development Permit to Carry Out Building Work; Carry Out Operational Work; Material Change of Use for Filling and/or Excavation; Prescribed Tidal Work; bar; food and drink outlet; function facility; hotel; indoor sport and recreation; office; shop;	28/06/2024
A006210576 (Minor Change 1)	Change Application (minor change) to Development Permit to Carry Out Building Work; Carry Out Operational Work; Material Change of Use for Filling and/or Excavation; Prescribed Tidal Work; bar; food and drink outlet; function facility; hotel; indoor sport and recreation; office; shop;	16/10/2023
A005477682 (Originating approval)	Development Permit for Carry Out Building Work; Carry Out Operational Work; Material Change of Use for Filling and/or Excavation; Prescribed Tidal Work; bar; food and drink outlet; function facility; hotel; indoor sport and recreation; office; shop;	17/12/2020

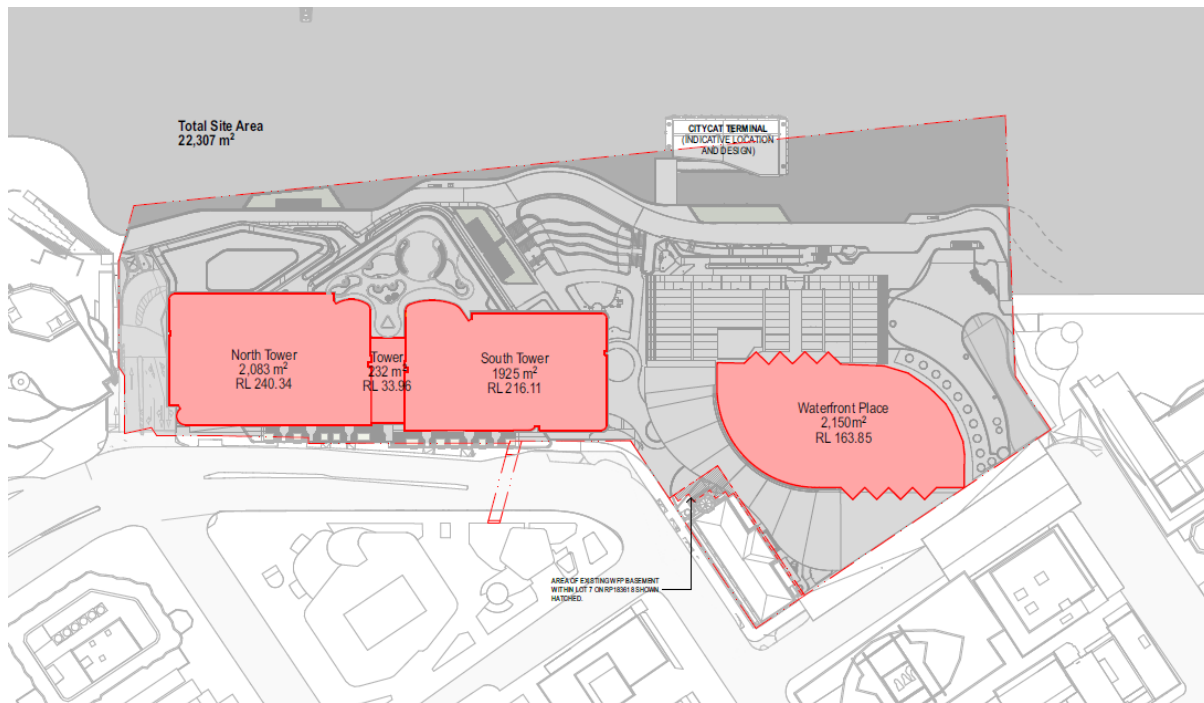


Figure 3: Tower Site Cover for the North and South Towers (Council Reference: A006826222)

4 Development Proposal

4.1 Overview

The proposed development seeks a Development Permit for a Material Change of Use for High Impact Industry (Standby Power Generator). A total of four (4) diesel power generators are proposed to be located within the building plant room of level 19 of the north tower and connected to the building's essential services switchboard via an automatic transfer system. Exhaust gases from each generator will be conveyed via dedicated high-temperature exhaust pipework from the generator outlets to discharge points located on the external eastern façade at level 19. The exhaust terminations are arranged to discharge horizontally from the plant room enclosure, directing exhaust gases away from the building envelope towards the Brisbane River to the east.

To support the function of the generators, two (2) bulk diesel storage fuel tanks area proposed to be located within basement level B3 of both the northern and southern towers and four (4) 1,000L Day Tanks are proposed within Level 19. Distribution of fuel from the tanks to the generators will be done via above-ground 304 stainless steel tube pipework from the basement level to level 19.

For additional details on the proposed development, refer to the Technical Assessment Report provided within **Attachment 5**. The proposed plans and drawings of the proposed bulk fuel tanks and power generators are provided with in **Attachment 4**.

A numerical overview of the proposed development is provided in **Table 7**.

Table 7: Numerical Overview		
Component	Northern Tower	Southern Tower
No. of generators	4	0
Voltage	415V	NA
Type of fuel	Diesel	Diesel
Volume of fuel storage	49,000L	38,000L
Location of power generators	Level 19	NA
Location of fuel storage tanks	Basement 3	Basement 3

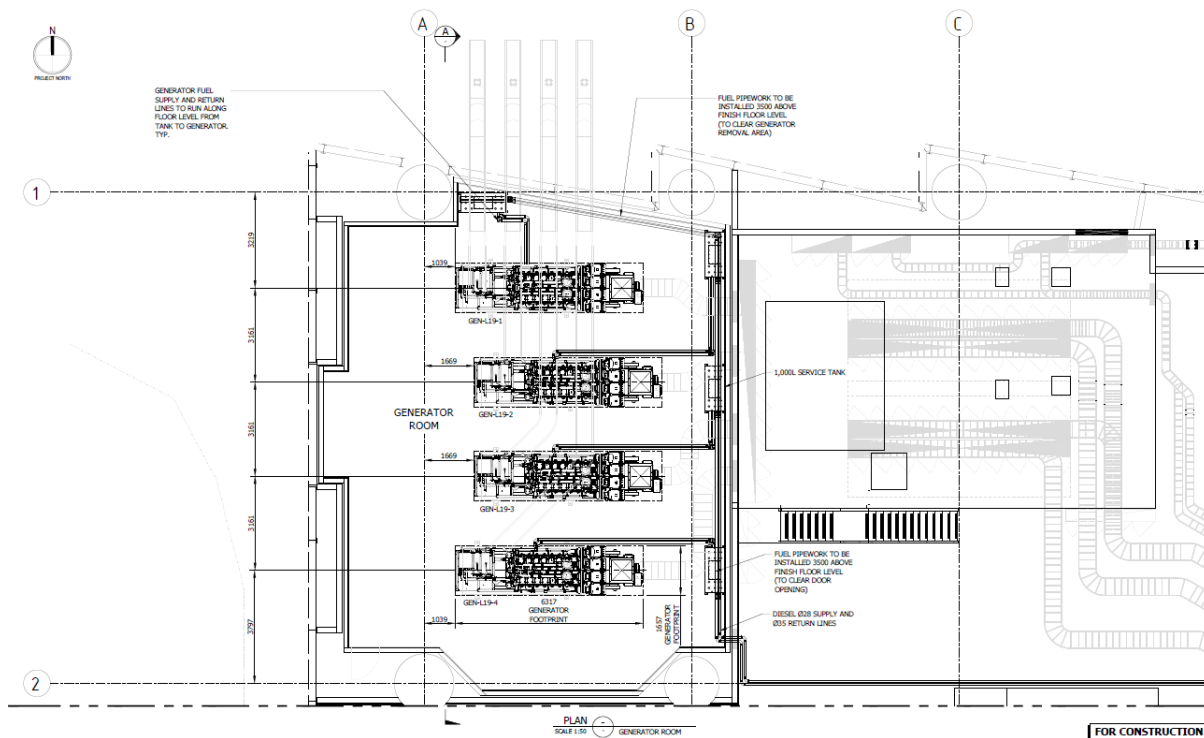


Figure 4: Generator Room and Fuel Piping Plan Revision 3 (Source: DRAC, 2026)

4.2 Frequency of Use

The power generators will ensure the continued operation of critical building infrastructure during loss of utility power and are exclusively for emergency standby purposes including:

- Fire and life safety systems;
- Emergency lighting;
- Fire pumps;
- Smoke exhaust systems;
- Fire detection systems;
- Lifts;
- Critical building management systems; and
- Essential Tenant Loads.

The generators are expected to operate for approximately 6 hours a year for routine maintenance/testing purposes and on an ad hoc basis during power outage events, which based on the resilience of the Energex grid within the CBD is expected to be minimal.

4.3 Fuel System

The generators will be powered by a diesel fuel tank system located within the basement 3 levels of the north and south towers (see Figure 5 below).

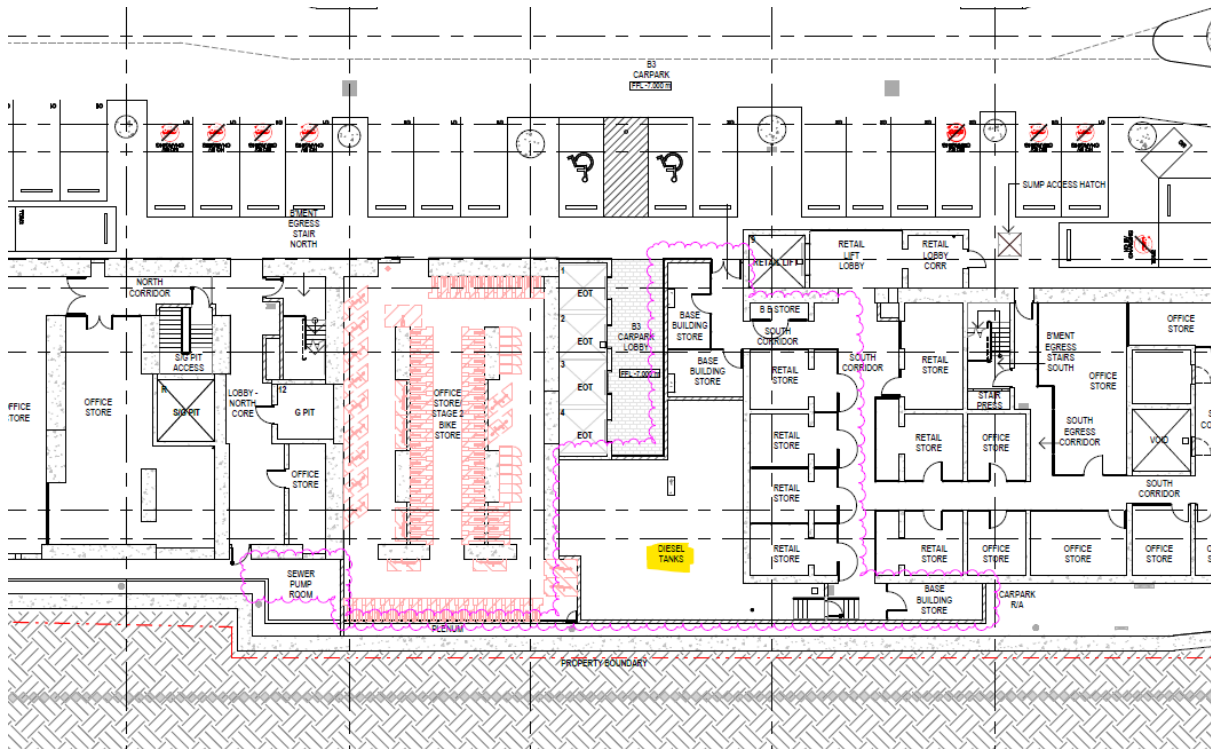


Figure 5: Location of the Proposed Diesel Tanks (Source: Arkhefield, 2026)

Details of the proposed fuel tank system are outlined below:

North Tower:

- 45,000L bulk storage tank on Basement 3
- Diesel fill point at Ground level
- Fuel transfer pumps on Basement 3 with reticulation pipework to the level 19 Generator Plantroom
- 4 x 1,000L SFL Day Tanks on Level 19

South Tower:

- 38,000L bulk storage tank on Basement 3
- Diesel fill point at Ground level

Importantly, the total combined amount of fuel proposed to be stored on site is 87,000 and therefore, complies with the accepted threshold for a Category 4 flammable liquid in accordance with Schedule 11 column 5 of the Work Health and Safety Regulation 2011. Furthermore, the fuel will be appropriately stored within the storage tanks to ensure no impacts on the safety of people or the environment are introduced.

4.4 Impacts on Health and Amenity

4.4.1 Air Quality

An Air Quality Assessment was prepared by MWA Environmental as part of the original development approval for the commercial towers associated with the Waterfront Brisbane development (Council Reference: A005477682) and was prepared in response to items 54 (d), (e), and (f) of the information request issued by Council for the original development approval (Document Reference: L31720/BH/20-159). Items 54 (d), (e), and (f) of the information request included:

- d) *Air quality implications of the operation and testing of the backup power generator needs to be presented (via Air quality impact report).*
- e) *Air quality and odour implications of commercial premises for cooking needs to be presented (via Air quality impact report).*
- f) *Air quality implications of carparking vents needs to be presented (via Air quality impact report).*

For the purposes of this development application, the approved Air Quality Assessment and specifically the response to Item 54d of the information request is considered sufficient in addressing any potential impacts and mitigation strategies for the proposed standby power generators. As such, an amended Air Quality Assessment report is not considered as being required to support this development application.

It is however, acknowledged that the approved Air Quality Assessment (Ref: L31720/BH/20-159) suggests the power generators are located on level 18 of the north tower. This is no longer correct as a previous approval (Council ref: A006826222) resulted in the relocation of the plant and equipment room to level 19 of the north tower. Council is therefore requested to 'amend in red' page 3 of the approved Air Quality Assessment to reflect the revised location of the power generators. Importantly, the relocation from level 18 to level 19 does not result in any impacts to the outcome of this technical reporting and the findings of the report therefore remain valid.

The Assessment confirms the proposed power generators have been appropriately designed to ensure no impact to health and amenity are introduced. Specifically, the assessment demonstrates:

- The proposed standby generators are anticipated to run only a few hours per year for routine maintenance/testing and in the event of a network supply interruption.
- The standby generators will be specified with a particulate catalytic filter on the exhaust system to minimise emissions of smoke, particulates carbon monoxide and hydrocarbons.
- The exhaust discharge horizontally over the Brisbane River at level 19 to allow for the dispersion of emissions over the river, minimising risks of the plume impact on existing and potential future buildings.
- The proposed power generators do not impact upon the health, safety, and amenity of public spaces and the environment.

For further details, refer to the Air Quality Assessment provided within **Attachment 7**.

4.4.2 Noise

Noise emissions generated by the power generators are not anticipated to result in impacts on amenity to surrounding properties and public spaces. As previously mentioned, the power generators are not intended to

operate on a regular basis, meaning the operation will be intermittent and of limited duration. The building plant equipment room in which the generators will be located, provides significant vertical separation from the ground level and surrounding public areas and acoustic attenuation due to the mass of the building structure and enclosure of the plant space. Noise is further reduced through the choice of providing for water-cooled engine system which does not require radiator fans and also through the installation of industrial grade exhaust silencers which will be selected and installed on each generator exhaust system by the acoustic engineer at the design stage.

To further demonstrate the proposed power generators do not adversely impact the amenity of surrounding sensitive uses and public spaces, a Noise Impact Assessment has been prepared by Stantec and provided within **Attachment 6**. In accordance with the Noise Impact Assessment, it is recommended the proposed generators are located within a second room within the plant building and equipment room. **Figure 6** below demonstrates the proposed general arrangements of the power generator room. Various acoustic attenuation and treatment measures will be implemented within the power generator room, including:

- A floating floor;
- Acoustically attenuated walls;
- A suspended ceiling; and
- Acoustically sealed doors.

For further details refer to the Technical Assessment Report and Noise Impact Assessment provided within **Attachment 5** and **Attachment 6** respectively.

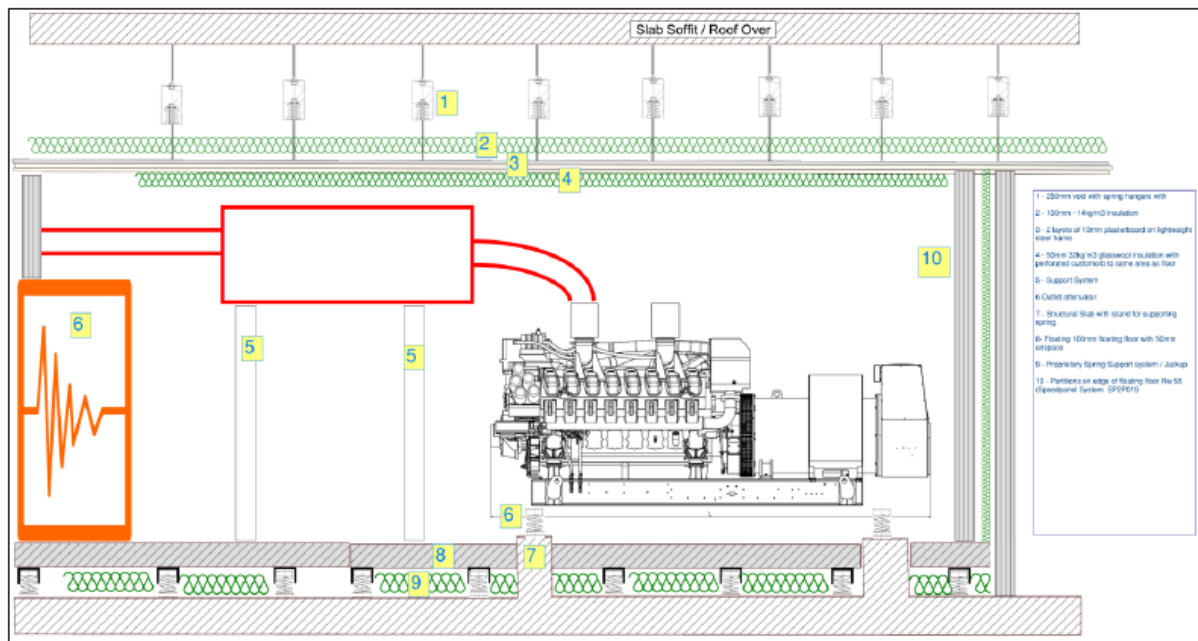


Figure 6: Construction Concept of Generator Room (Source: Stantec, 2026)

4.5 Environmentally Relevant Activities

Chemical storage, electricity generation and fuel burning can sometimes be defined as “Environmentally Relevant Activities” (i.e. ERA 8, 14 and 15) under the *Environmental Protection Regulation 2008* and can require an Environmental Authority (EA) permit in conjunction with a Material Change of Use development approval for the activity to occur on the site, should the relevant thresholds are expected to be exceeded.

It is acknowledged that the fuel storage quantities, power outputs and fuel burning capacity are subject to change during detailed design, however it is not anticipated that the proposed development exceeds the relevant thresholds to be considered as Environmentally Relevant Activities. An assessment of the proposed development against the relevant ERA thresholds is provided in **Table 8** below.

Table 8: Assessment of Relevant ERA Thresholds

ERA	Thresholds	Applicability
ERA 8 – Chemical Storage	1) Chemical storage (the relevant activity) consists of storing— a) 50t or more of chemicals of dangerous goods class 1 or class 2, division 2.3 in containers of at least 10m³; or b) 50t or more of chemicals of dangerous goods class 6, division 6.1 in containers capable of holding at least 900kg of the chemicals; c) more than 500m³ of chemicals of class C1 or C2 combustible liquids under AS 1940 or dangerous goods class 3; or d) the following quantities of other chemicals in containers of at least 10m³— i. 200t or more, if they are solids or gases; ii. 200m³ or more, if they are liquids.	Not Applicable The proposed standby generator utilises diesel fuel, which is classified as a Class C1 combustible liquid dangerous goods type. The proposed fuel storage tanks will not exceed more than 500m ³ of chemicals and therefore, does not require an EA permit for ERA 8.
ERA 14 – Electricity Generation	1) Electricity generation (the relevant activity) consists of generating electricity by using fuel at a rated capacity of 10MW electrical or more.	Not Applicable The total capacity of the proposed generators is a maximum of 9MW and will not exceed 10MW. As such, the proposed power generators do not exceed the threshold for ERA 14 and therefore, do not require an EA permit for ERA 14.
ERA 15 – Fuel Burning	Fuel burning (the relevant activity) consists of using fuel burning equipment that is capable of burning at least 500kg of fuel in an hour where operating for more than 200 hours in a year.	Not Applicable It is anticipated the proposed power generators will run approximately 6 hours per year for routine maintenance. Additional time may be required for power outages and additional operator testing but is likely to be significantly less than 200 hours per year. The maximum fuel burning capacity is less than 500kg of fuel per hour and as such, the proposed development does not exceed the threshold for ERA 15.

5 Technical Documents

To ensure a comprehensive and quality outcome is achieved for the proposed development, a qualified team of consultants has been coordinated to provide specialist assessments and where necessary, the specialist assessments have been summarised in the following sections.

5.1 Technical Assessment Report

A Technical Assessment Report has been prepared by KME Services Pty Ltd and is provided within **Attachment 5**. The report outlines the specifications of the system proposed and concludes:

- The installed generators are standby-rated units and will operate only during emergency power outages or during scheduled maintenance and servicing activities.
- During the quarterly and six-monthly service intervals, each generator will be run for approximately 15 minutes under no-load conditions as part of the inspection and testing procedures.
- The estimated total annual diesel consumption associated with routine generator servicing is approximately 1,000 litres per annum.
- The proposed development includes the installation of two bulk diesel storage tanks, located within basement level B3.
- The generators will be installed within a designated plant area on level 19 within the building designed to accommodate mechanical and electrical plant.
- The generators will be mounted on anti-vibration mounts to minimise the transmission of vibration to the building structure.
- Each of the generators will be provided with an individual exhaust system designed to safely discharge combustion gases generated during operation.
- The exhaust terminations are arranged to discharge horizontally from the plant room enclosure, directing exhaust gases away from the building envelope toward the east.
- Given the high-level plant room location, intermittent operation, and the incorporation of exhaust silencers and vibration isolation, the generator installation is not expected to result in unreasonable noise impacts to surrounding properties.
- The bulk storage system consists of:
 - One (1) 45,000 L SFL above-ground double-skin bulk diesel storage tank
 - One (1) 38,000 L SFL above-ground double-skin bulk diesel storage tank
 - Four (4) SFL day tanks
- Diesel fuel will be transferred from the bulk storage tank via the transfer pump stand through the stainless-steel pipework riser system to the generator service tanks located on level 19.
- The generators utilise a water-cooled engine system connected to the building condenser water system.
- The emergency generator system will be controlled and monitored via a dedicated generator control

system designed to ensure reliable automatic operation during loss of normal electrical supply.

5.2 Noise Impact Assessment

A Noise Impact Assessment has been prepared by Stantec and is provided within **Attachment 6** and assesses the noise impacts of the proposed generator plantroom.

In summary, the report concludes:

- To achieve compliance with the generator noise criteria, acoustic treatments are proposed, including:
 - A floating floor
 - Acoustically attenuated inner walls
 - Outer room walls which extend between the structural slabs outside of the floating floor extent.
 - Absorptive room linings to 100% of the floor areas of the room.
 - Suspended ceiling with plasterboard lining
 - Double frame layer doors using 40mm solid-core doors and acoustic seals.
 - Air intake attenuators, Air outlet attenuators, and Exhaust silencer selections which meet the nominated noise limits as outlined in sections 5.1.1.4, 5.1.1.5, and 5.1.1.6 of the Report.

Overall, the Noise Impact Assessment demonstrates that through the above acoustic attenuation measures, the appropriate noise criteria can be met to ensure no adverse impacts are introduced to surrounding sensitive uses including the Felix Street Apartments, Stamford Plaza Hotel, Hamilton Street and McDonald Street residents, and the Riparian Plaza residential receptors.

5.3 Air Quality Assessment

An Air Quality Assessment was prepared by MWA Environmental in response to the information request issued by Council as part of the original development approval (**Council Reference: A005477682**). The approved Air Quality Assessment addressed air quality implications of the standby power generators, demonstrating no impacts to the health and safety of people or the environment are introduced.

The Air Quality Assessment is provided within **Attachment 7** and concludes:

- There is minimal risk of health or amenity impacts associated with the proposed generators because:
 - The standby generators are anticipated to run only a few hours per year for routine maintenance/testing and in the event of network supply interruption;
 - The standby generators will be specified with a particulate catalytic filter on the exhaust system to minimise emissions of smoke, particulates carbon monoxide and hydrocarbons; and
 - The exhaust discharge horizontally over the Brisbane River at level 19 allow for dispersion of emissions over the river and minimises risks of the plume impact on existing and potential future buildings.
 - The plume directional momentum and buoyancy will allow for dispersion of emissions over the

river which limits potential for impact at ground level public areas or buildings.

6 Statutory Planning Provisions

6.1 State Framework

6.1.1 Planning Act 2016

Under the provisions of the Act, the proposed development involves a Material Change of Use and is assessable development. The City Plan identifies the category of assessment is Impact Assessment.

6.1.2 Assessment Manager

The assessment manager for this development application is Brisbane City Council, as determined by the *Planning Regulation 2017 (Planning Regulation)*.

6.1.3 Public Notification

As the proposed development is subject to Impact assessment, public notification will be required as part of the development application process in accordance with section 53(1)(a) of the Act. It is further understood that, in accordance with section 53(4)(b)(iii) of the Act, public notification is to be carried out for a period of fifteen (15) business days.

6.1.4 Referral Agencies

An assessment of Schedule 10 of the Planning Regulation has identified the application does not require referral to the State Assessment and Referral Agency (SARA).

Table 9 identifies the applicable referral agencies and triggers under the Planning Regulation.

Table 9: Referral Agencies and Triggers under the Planning Regulation		
Matter of Interest	Schedule 10 Reference	Applicability
Airport Land	Part 1	No
Caboolture West interim structure plan	Part 2A	No
Clearing native vegetation	Part 3	No
Contaminated land	Part 4	No
Environmentally relevant activities	Part 5	No
Fisheries	Part 6	No
Hazardous chemical facilities	Part 7	No
Heritage places	Part 8	No
Infrastructure related referrals	Part 9	No
Koala habitat in SEQ region	Part 10	No
Noise sensitive place on noise attenuated land	Part 11	No
Operational work for reconfiguring a lot	Part 12	No
Ports	Part 13	No

Table 9: Referral Agencies and Triggers under the Planning Regulation

Matter of Interest	Schedule 10 Reference	Applicability
Reconfiguring a lot under Land Title Act	Part 14	No
SEQ development areas and SEQ major enterprise and industrial areas	Part 15	No
SEQ regional landscape and rural production area and rural living area	Part 16	No
Solar Farms	Part 16AA	No
Southport Spit	Part 16A	No
SEQ northern inter-urban break	Part 16B	No
Tidal works or work in a coastal management district	Part 17	No
Urban design	Part 18	No
Water related development	Part 19	No
Wetland protection area	Part 20	No
Wind farms	Part 21	No

6.2 State Planning Policy

The current *State Planning Policy 2017 (SPP)* commenced in July 2017 and establishes the State's interests that must be addressed through local government planning schemes, regional plans and when making development decisions. It is understood that in accordance with section 2.1 of the City Plan, the City Plan does not fully reflect the interests of the SPP for the bushfire prone area and for strategic airports and aviation facilities.

Part E of the SPP outlines the assessment benchmarks for each State interest. The assessment benchmarks are applicable to the assessment of the development application to the extent the SPP has not been integrated into the City Plan.

An assessment has been undertaken against the SPP to the extent of any inconsistency (refer to **Table 10**), and it does not introduce any additional assessment benchmarks relevant to the site or the proposed development.

Table 10: State Planning Policy – Part E Assessment Benchmarks

State Interest	Complies	Assessment Benchmark Response
Planning for Liveable Communities and Housing		
Housing Supply and Diversity	Not Applicable	The proposed development involves an industrial use. No housing supply is proposed.
Liveable Communities	Complies	The proposed development will contribute to liveable communities by supporting the operations and safety of the approved waterfront commercial towers, providing backup power when required.
Planning for Economic Growth		
Agriculture	Not Applicable	The proposed development does not facilitate or envisage any agriculture component.

Table 10: State Planning Policy – Part E Assessment Benchmarks

State Interest	Complies	Assessment Benchmark Response
Development and Construction	Complies	The proposed development ensures that development remains consistent with the expectation of the local area for urban development.
Mining and Extractive Resources	Not Applicable	The proposed development does not facilitate or envisage any mining or extractive resources components.
Tourism	Not Applicable	The proposed development does not facilitate or envisage any tourism components.
Planning for the Environment and Heritage		
Biodiversity	Not Applicable	The subject site is not mapped as containing any valued vegetation and biodiversity in accordance with the SPP mapping.
Coastal Environment	Complies	The subject site is located within a coastal management district area. The City Plan includes overlays which adequately address coastal environments.
Cultural Heritage	Not Applicable	The subject site does not contain any areas of cultural heritage significance.
Water Quality	Complies	The proposed development is for a power generator to support the approved waterfront towers which are currently under construction over the site. Stormwater management and quality have been addressed as part of historic approvals over the site.
Planning for Safety and Resilience to Hazards		
Emissions and Hazardous Activities	Complies	The proposed development for the power generators does not introduce any potential hazards or threats to the safety of people or the environment.
Natural Hazards, Risk and Resilience	Complies	Under the DAMS mapping, the site is located within a Local Government Flood Mapping Area. The City Plan includes overlays which adequately address flood hazards.
Planning for Infrastructure		
Energy and Water Supply	Complies	The subject site will be appropriately connected to electricity and water supply.
Infrastructure Integration	Complies	The proposed development will ensure any future development over the site integrates infrastructure accordingly and utilises infrastructure where necessary.
Transport Infrastructure	Complies	Transport infrastructure will continue to function unobstructed by the proposed development.
Strategic Airports and Aviation Facilities	Not Applicable	The subject site is not affected by strategic airports or aviation facilities.
Strategic Ports	Not Applicable	The site is not within a strategic port location.

6.3 South East Queensland Regional Plan 2023

The primary purpose of the South East Queensland Regional Plan (SEQRP), is to provide a sustainable growth management strategy for the region that articulates the strategic direction and certainty to accommodate a significant increase in population in SEQ to 2046.

The subject site is wholly located within the Urban Footprint (shown in **Figure 7**) which identifies land that can meet the region's urban development needs to 2046. The proposed development is considered to accord with the Urban Footprint land use intent of the SEQRP, as it proposes development which supports the operations of commercial development within the Brisbane City Centre.



Figure 7: SEQ Regional Plan Triggers (Source: State Development Assessment Mapping System, 2026)

7 Local Framework

7.1 Local Planning Instrument

The *Brisbane City Plan 2014* (version 37.00/2026) is the applicable planning scheme for the City of Brisbane and provides the relevant framework for development assessment and approval. The provisions of the City Plan relevant to the proposed development are identified and addressed in the following sections of this report.

7.2 Definition

Pursuant to Schedule 1 of the City Plan, the land uses proposed as part of this development application are defined as:

High Impact Industry means the use of premises for an industrial activity—

- a) *that is the manufacturing, producing, processing, repairing, altering, recycling, storing, distributing, transferring or treating of products; and*
- b) *that a local planning instrument applying to the premises states is a high impact industry; and*
- c) *that complies with any thresholds for the activity stated in a local planning instrument applying to the premises, including, for example, thresholds relating to the number of products manufactured or the level of emissions produced by the activity.*

For the purposes of the planning scheme a high impact industry is an industry activity that—

- a) *has one or more of the following attributes—*
 - i. *potential for significant impacts on sensitive land uses due to off-site emissions including aerosol, fume, particle, smoke, odour and noise;*
 - ii. *potential for significant off-site impacts in the event of fire, explosion or toxic release;*
 - iii. *generates high traffic flows in the context of the locality or the road network;*
 - iv. *generates a significant demand on the local infrastructure network;*
 - v. *on-site controls are required for emissions and dangerous goods risks; and*
- b) *complies with any thresholds for the activity stated in SC1.1.3 industry thresholds.*

SC1.1.3 of the Planning Scheme details the following relevant thresholds for a High Impact Industry:

- k) Fuel burning where not a utility installation with an installed capacity of more than 0.1 MW, if:
 - i. less than 10 MW;
 - ii. not involving coal combustion

The proposed power generators will be capable of generating approximately 9MW of power, but no more than 10MW and will not involve coal combustion. As such the proposed development aligns with the definition and thresholds for a High Impact Industry use.

7.3 Assessment Benchmarks

The proposed development achieves compliance with the applicable provisions of the relevant assessment benchmarks. The benchmarks applicable to the proposed development are listed in **Table 11** and the relevant codes are addressed in **Attachment 8**.

Table 11: Assessment Benchmarks		
Code	Applicability	Comment
Strategic Framework		
Theme 1: Brisbane's globally competitive economy, Element 1.1 – Brisbane as a centre for global business and Element 1.3 – Brisbane's population-serving economy; Theme 2: Brisbane's outstanding lifestyle, Element 2.1 – Brisbane's identity; Theme 5: Brisbane's CityShape, Element 5.1 – Brisbane's City Centre, Element 5.3 – Brisbane's Major Centres and Element 5.8 – Brisbane's Growth Nodes on Selected Transport Corridors.	Applicable	As the proposed development is subject to impact assessment, a response against the strategic framework and specifically the themes specified within column 1 has been prepared and provided within section 7.4 of this report.
Overlay Codes		
Airport Environs Overlay Code	Applicable	In accordance with Table 5.10.2, a response to the Airport Environs Overlay Code has been prepared by Place Design Group and is provided in Attachment 8 .
Bicycle Network Overlay Code	Not Applicable	In accordance with Table 5.10.3, a response to the Bicycle Network Overlay Code is not required.
Coastal Hazard Overlay Code	Applicable	In accordance with Table 5.10.6, a response to the Coastal Hazard Overlay Code has been prepared by Place Design Group and is provided in Attachment 8 .
Community Purposes Network Overlay Code	Not Applicable	In accordance with Table 5.10.7A, a response to the Community Purposes Network Overlay Code is not required.
Critical Infrastructure and Movement Network Overlay Code	Applicable	In accordance with Table 5.10.8, a response to the Critical Infrastructure and Movement Network Overlay Code has been prepared by Place Design Group and is provided in Attachment 8 .
Flood Overlay Code	Applicable	In accordance with Table 5.10.11, a response to the Flood Overlay Code has been prepared by Place Design Group and is provided in Attachment 8 .
Heritage Overlay Code	Not Applicable	In accordance with Table 5.10.12, a response to the Heritage Overlay Code, is not required.

Table 11: Assessment Benchmarks

Code	Applicability	Comment
Potential and Actual Acid Sulfate Soils Overlay Code	Not Applicable	The proposed development does not involve filling or excavation of the site. As such, in accordance with Table 5.10.15, a response to the Potential and Actual Acid Sulfate Soils Overlay Code is not required.
Road Hierarchy Overlay Code	Not Applicable	In accordance with Table 5.10.18 a response to the Road Hierarchy Overlay Code is not required.
Streetscape Hierarchy Overlay Code	Not Applicable	In accordance with Table 5.10.20, a response to the Streetscape Hierarchy Overlay Code is not required.
Waterway Corridors Overlay Code	Not Applicable	The proposed power generators are to be fully contained within the approved commercial towers over the site. As such, a response to the Waterway Corridors Overlay Code is not considered as being applicable in this instance.
Neighbourhood Plan code(s)		
City centre neighbourhood plan code	Applicable	An assessment of the overall outcomes for the City Centre Neighbourhood Plan has been provided within section 7.5 of this report. Additionally, an assessment against the City Centre Neighbourhood Plan Code has been prepared by Place Design Group and is provided within Attachment 8 .
Zone code(s)		
Principal Centre (City centre) zone code	Applicable	An assessment against the overall outcomes of the Industry Zone Code has been provided in section 7.6 of this report.
Development code(s)		
Industry Code	Applicable	A response to the Industry Code has been prepared by Place Design Group and is provided in Attachment 8 .
Secondary Codes		
Filling and Excavation Code	Not Applicable	The proposed development does not involve filling or excavation. As such, a response to the filling and excavation code is not required.
Infrastructure Design Code	Not Applicable	A response to the Infrastructure Design Code has been prepared as part of historic development approvals over the site and is not required as part of this development application.
Landscape Work Code	Not Applicable	The proposed development is for a power generator and does not involve changes to landscaping outcomes as part of historic approvals over the site.
Outdoor Lighting Code	Not Applicable	The proposed development is for a power generator and does not involve any outdoor lighting.
Park Planning and Design Code	Not Applicable	This development application does not propose development that is a park.

Table 11: Assessment Benchmarks

Code	Applicability	Comment
Stormwater Code	Not Applicable	The proposed development is for a power generator and does not result in changes to stormwater outcomes or mitigation strategies as part of historic approvals over the site.
Transport, Access, Parking and Servicing Code	Not Applicable	The proposed development is for a power generator and does not result in changes to traffic or the safety of the surrounding road network. The TAPS code has been addressed as part of historic development approvals over the site.
Wastewater Code	Not Applicable	The subject site is currently serviced by existing urban infrastructure. As such, a response to the Wastewater Code is not required.

7.4 Strategic Framework

As the proposed development is subject to impact assessment, the Strategic Framework is identified as an assessment benchmark. The Strategic Framework sets the policy direction for the planning scheme and forms the basis for ensuring appropriate development occurs throughout the Brisbane area for the life of the City Plan.

The following five (5) themes collectively represent the policy intent of the City Plan:

- Theme 1: Brisbane's globally competitive economy;
- Theme 2: Brisbane's outstanding lifestyle;
- Theme 3: Brisbane's clean and green leading environmental performance;
- Theme 4: Brisbane's highly effective transport and infrastructure; and
- Theme 5: Brisbane's CityShape.

In particular, development within the Principal centre zone relates to the following themes of the Strategic Framework:

- i. Theme 1: Brisbane's globally competitive economy, Element 1.1 – Brisbane as a centre for global business and Element 1.3 – Brisbane's population-serving economy;
- ii. Theme 2: Brisbane's outstanding lifestyle, Element 2.1 – Brisbane's identity; and
- iii. Theme 5: Brisbane's CityShape, Element 5.1 – Brisbane's City Centre, Element 5.3 – Brisbane's Major Centres and Element 5.8 – Brisbane's Growth Nodes on Selected Transport Corridors.

The proposed development aligns with the strategic outcomes, specific outcomes, and land use strategies of the above themes, to support Brisbane's economy, outstanding lifestyle, and city shape.

Specifically, the proposed development will support the operations of the approved commercial waterfront towers which form part of the waterfront precinct. This development supports a significant city-shaping project within the Brisbane CBD, positively contributing to the city's economic vitality and long-term resilience.

The proposed power generators will provide a backup power source for the commercial towers to support the

continuous, reliable operation of commercial activities, even in the event of power outages or other unforeseen disruptions to power sources.

Furthermore, the proposed power generator and diesel fuel tanks are to be wholly contained within the building footprint and are appropriately stored and located within an acoustically-sound room to avoid adverse impacts on the amenity of adjoining premises and public spaces. The proposed generator maintains the established non-industrial character of Brisbane's CBD and reinforces its role and function as SEQ's primary economic hub.

7.5 Neighbourhood plan

The subject site is mapped within the bounds of the City Centre Neighbourhood Plan area, specifically within the River precinct. The purpose of the City Centre neighbourhood plan code is to provide finer grained planning at a local level for the City Centre neighbourhood plan area. The purpose of the River precinct is achieved through the following overall outcomes:

- a. *The precinct is one of Brisbane's premier dining and recreation precincts, showcasing the waterfront to residents, workers and tourists 24 hours a day, seven days a week.*
- b. *The river edge is enhanced as a generous and unified urban public space for pedestrians and cyclists, diners and visitors.*
- c. *High density waterfront development optimises the amount of public space at ground level, creating a sense of openness and space for pedestrians. New and improved spaces between buildings provide open visual and physical connections from the city grid to the river and beyond. Landscaping is used to create subtropical towers in a riverside garden setting.*
- d. *A multi-layered river edge provides for river activities at the water level, a waterfront promenade at the lower level, publicly accessible and active low-rise tenancies at the middle level, and well-spaced towers that are set back from the river at the upper level.*

The proposed development ensures the overall outcomes of the City Centre neighbourhood plan code and specifically for the River precinct is achieved. The proposed development provides for a backup power source to support the approved waterfront commercial towers, continuing to support the city centre's function as SEQ's centre for economic growth and social capital. Furthermore, the proposed power generators support the River precinct's 24 hour function, ensuring development along Brisbane's River frontage is vibrant and activated.

The proposed power generator will be contained within the approved towers to ensure no impact on the amenity or safety of public spaces within the Waterfront precinct and along the riverfront are introduced. Furthermore, the proposed development ensures the commercial towers maintain a highly attractive built form outcome, including landscaping areas which positively contribute to Brisbane's iconic skyline and public realm.

A full response to the assessment benchmarks of the City Centre Neighbourhood Plan code are provided within **Attachment 8**.

7.6 Zoning

The site is located within the Principal centre zone. The purpose of the Principal centre zone is to provide for a large variety of uses and activities including administrative, business, community, cultural, entertainment, professional, residential or retail activities.

The proposed development aligns with the purpose of the Principal centre zone, providing for a backup power

source to support the operations and activities associated with the approved waterfront commercial towers. Furthermore, the proposed development ensures the character and amenity of Brisbane's city centre is maintained, aligning with the overall outcomes of the Principal centre zone. Specifically, the proposed development:

- Supports the approved built form and design outcomes of the waterfront commercial towers and does not involve changes to access arrangements or services.
- Maintains a high level of amenity and supports the established character of the capital city centre.
- Does not impact upon key views or vistas and is to be wholly maintained within the approved towers.
- Supports the 24-hour function of the capital city centre, providing for reliable backup power supply to enhance economic resilience and vitality.

7.7 Overlays

Overlays have the potential to alter the level of assessment for development in accordance with Part 5 of City Plan. Where development is proposed on premises partly affected by an overlay, the assessment benchmarks for the overlay only relates to the part of the premises affected by the overlay.

The subject site is identified as being affected by a number of overlays. However, the proposed development is to be maintained within the existing built form of the approved commercial towers and does not involve and filling or excavation of the site. As such, many of these overlays are not applicable.

Where further assessment has been considered, a full response to the applicable overlay code has been provided in **Attachment 8**.

8 Conclusion

This Town Planning Assessment Report has been prepared to accompany a development application pursuant to section 51 of the Act for a Development Permit for a Material Change of Use for High Impact Industry (Standby Power Generator) over land at 45, 45A, 45D, & 45E Eagle Street Brisbane City, more formally described as Lot 50 on RP817615, Lot 9 on SL12596, Lot 100 on SP314779, and Lot 110 on SP314779.

Specifically, the proposed power generators will provide backup power supply to the approved commercial towers as part of the waterfront development (**Council Reference: A006826222**) in the event of a power outage.

Overall, the development:

- Provides for four (4) diesel powered standby power generators which are to be located on level 19 of the approved north tower.
- The power generators are to be powered by a diesel fuel tank system located on the basement levels of the north and south towers.
- The total amount of fuel to be stored on site is 87,000L.
- Is only anticipated to be used during routine maintenance checkups and in the rare event of a power outage.
- Does not involve any changes to the approved built form outcomes of the towers including changes to access and servicing.
- Ensures no impact to the amenity and safety of public spaces is introduced, through appropriate acoustic attenuation and air quality control measures.
- Continues to support the function, character, and amenity of Brisbane's CBD, particularly ensuring the resilient and reliable operations of commercial activities within the towers.

The information provided in this report and the supporting technical documents, demonstrates the proposed development represents an appropriate outcome for the subject site, is consistent with the Principal centre zone, and ensures the long-term vitality of the Brisbane CBD.

In view of the above, it is recommended that the Council favourably considers the proposed development and approve the development application, subject to reasonable and relevant conditions. Should you have any queries or require further information, please contact Renee Livingstone & Rebecca Atchison on (07) 3852 3922 or renee.l@placedesigngroup.com & rebecca.a@placedesigngroup.com.