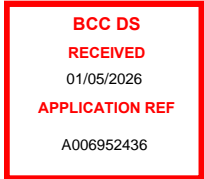


1 May 2026

Brisbane City Council  
GPO Box 1434  
Brisbane QLD 4001



**Attention:** Jenny Bernard, Planning Services North

Dear Jenny,

**RE: Response to Information Request - A006952436 – 12 Archimedes Street, Darra**

Doyen Planning Pty Ltd is the Applicant in relation to the development application over the site at 12 Archimedes Street, Darra, formally described as Lot 34 on RP178660.

The application seeks approval for a Material Change of Use for Special industry, involving a Coregas test station and storage facility.

We refer to correspondence from Brisbane City Council dated 6 March 2026, constituting an Information Request pursuant to Part 3 of the Development Assessment Rules.

In accordance with section 13.2(a) of the Development Assessment Rules, it is advised that all of the information requested is provided.

Given all of the information requested under section 13.2 of the Development Assessment Rules has been provided, the applicant response period has ended, and we advise that Brisbane City Council should proceed with the assessment of the Development Application.

Following this letter, a response is provided to each part of Council's Information Request, providing the extract and a corresponding response.

The response includes the following documentation:

- **Attachment A** - Amended Proposal Plans
- **Attachment B** - Civil Engineering Information Request Response
- **Attachment C** - Site Based Stormwater Management Plan
- **Attachment D** - Air Quality Impact Assessment
- **Attachment E** - Preliminary Hazard Analysis

Should you have any questions in relation to the proposal, please contact our office on (07) 3180 4702.

Yours Sincerely,

.....  
**Rhys Trombetta**  
Director  
Doyen Planning





# Response to Information Request

12 Archimedes Street, Darra

## Introduction

We refer to Council's letter dated 6 March 2026 in relation to the above site and provide below a response to the matters raised.

The Applicant and their project team have undertaken a detailed review of the Information Request. Further specialist input has also been obtained where required, including in relation to civil engineering, stormwater management, air quality and hazard and risk matters.

The following response should be read in conjunction with the amended proposal plans and supporting documentation submitted with this response.

### Item 1 –

Owners consent from Brisbane City Council

*Please note that land access, owner's consent, and/or dedication authority may be required in relation to the Lot 31 on RP172207 (Address: 2778A Ipswich Road, Darra).*

*You are requested to contact Council's Land Use Management Team to confirm the requirements and obtain any necessary approvals or documentation.*

### Item 1 Response

The Applicant has contacted Council's Land Use Management Team via [ISG-LandUse@brisbane.qld.gov.au](mailto:ISG-LandUse@brisbane.qld.gov.au) in relation to the above matter.

At the time of preparing this response, the Applicant is awaiting further advice from the relevant Council department. Further details will be provided to Council once a response has been received.

### Item 2 –

Proposed land use

*Based on the information provided, the development may involve a Medium impact industry B use for spray painting, High impact industry for the storage of dangerous goods (to be confirmed by a dangerous goods consultant), as well as a Low impact industry use for cylinder servicing. Further clarification is required to establish the correct use.*

- a) *Confirm whether these uses are triggered and, if so, ensure the appropriate uses are included in the application.*
- b) *Clarify the basis on which the development is considered to trigger a Special industry use.*
- c) *Provide information on whether the development involves any fuel*



## Item 2 Response

The application has been made for a Material Change of Use for Special industry, involving a Coregas test station and storage facility.

The Applicant's position is that the proposed use is properly characterised as Special industry. The proposal is not considered to involve separate Low impact industry, Medium impact industry or High impact industry uses. Rather, the activities identified by Council form part of the overall Special industry operation and are ancillary or inherent to that use.

The City Plan use definitions provide some assistance in this regard. The definitions for Low impact industry, Medium impact industry and High impact industry each identify Special industry as a non-example or excluded use. On this basis, the Applicant understands the City Plan to treat these industry use categories as separate use classifications, rather than requiring each operational component of a Special industry use to be separately characterised as a lower-order industry use.

This approach is also consistent with the way ancillary components of a use are commonly understood in development assessment. For example, the proposal includes office and administration areas within the building, but those areas do not result in the application being characterised as an Office use. They are ancillary to, and functionally connected with, the principal Special industry use. The same approach applies to the paint booth, cylinder servicing areas and related operational components, which support the Coregas gas cylinder testing and servicing operation and are not proposed as separate stand-alone uses.

In relation to spray painting, spray painting is proposed, but only as part of the broader Coregas gas cylinder testing and servicing operation. The paint booth is only used for Coregas gas cylinders being tested or serviced as part of the site operation. It is not proposed to operate as a separate spray-painting business, nor is it proposed to be used for painting vehicles, unrelated equipment or third-party items.

The Vipac Air Quality Impact Assessment confirms that the proposed development includes a spray paint booth for surface coating and finishing of gas cylinders and provides a quantitative assessment of the potential air quality impacts associated with that activity. The assessment demonstrates that the air quality impacts of this component of the operation are acceptable.

In relation to dangerous goods, the storage and handling of dangerous goods is directly associated with the proposed Special industry use and is not proposed as a separate High impact industry use. The relevant dangerous goods quantities, classes, storage arrangements and associated risk matters are addressed in the Preliminary Hazard Analysis prepared by Riskcon Engineering Pty Ltd, provided at Attachment E.

The Riskcon Preliminary Hazard Analysis confirms that the facility will involve the storage and handling of gases classified as dangerous goods, including carbon dioxide, liquid nitrogen and liquid oxygen. It further confirms that the proposed facility includes tanker storage and that the stored tankers will contain dangerous goods, comprising three liquid nitrogen tankers and one liquid oxygen tanker.

In relation to cylinder servicing, this activity forms part of the proposed Special industry operation and is not proposed as a separate Low impact industry use. The cylinder servicing component is part of the overall gas cylinder testing, preparation and storage process undertaken by Coregas.

In relation to fuel-burning activities, Coregas has confirmed that no backup generators, emergency generators, fire pumps or similar fuel-burning equipment are proposed on the site. Accordingly, no additional Fuel Burning industry threshold or separate industry use is considered to be triggered. This is addressed further in response to Item 8 below.



### Item 3 –

#### Civil Engineering Report

*Please provide a comprehensive civil engineering report addressing all internal and external civil aspects of the proposed development. The report is to include, at a minimum:*

- a) Proposed surface treatments throughout the site.*
- b) Details of the stormwater management strategy, including collection, conveyance, and discharge arrangements.*
- c) Design details for all vehicle crossovers, including dimensions and construction standards.*
- d) Proposed kerb and channel works, including any required upgrades.*
- e) Any required pavement widening or associated works on adjoining road reserves.*

### Item 3 Response

A Civil Engineering Information Request Response has been prepared by Milanovic Neale Consulting Engineers and is included as Attachment B.

The MNCE response addresses the civil engineering matters raised by Council, including proposed surface treatments, stormwater management, vehicle crossovers, kerb and channel works, and pavement widening works. The response also refers to the supporting amended civil drawings and Site Based Stormwater Management Plan prepared for the development.

In summary, MNCE confirms that the internal car parking and heavy vehicle manoeuvring areas are proposed as reinforced concrete pavement, suitable for the low-speed, high-load conditions associated with heavy vehicle turning, braking and static loading.

The external road extension is proposed as flexible pavement with a bitumen-sealed surface over a granular pavement structure, consistent with typical local road construction.

With respect to stormwater, MNCE confirms that the existing surface grade of the outdoor circulation and storage area is proposed to be retained. A catch drain is proposed along the northern site boundary to capture surface stormwater runoff and direct it to a proposed pit and pipe system, which conveys stormwater into the existing public stormwater system within Archimedes Street.

MNCE also confirms that the proposed Ipswich Road crossover is a 10.0m wide Type B2 crossover, and the proposed Archimedes Street crossover is an 8.0m wide Type B2 crossover, each designed in accordance with Brisbane City Council's relevant standard drawing requirements.

The proposed kerb and channel works and pavement widening are also addressed in the MNCE response and supporting civil engineering drawings.

Further detail is provided in Attachment B and Attachment C.

### Item 4 –

#### Kerb and channel

*A non-trunk kerb and channel is required to be constructed along the full length of the Ipswich Road Service Road frontage of the site, on an 8-metre alignment from the intersection with Archimedes Street (to ensure clearance of all Public Utility Plant such as water, gas, telecommunications, or electricity infrastructure) through to a 4.25-metre alignment at the boundary with the sporting fields adjacent to the site. The new kerb and channel are to tie into the*



*existing kerb and channel along the site's frontage on Archimedes Street. Non-trunk pavement widening is required to ensure design vehicle swept path movements are wholly contained to sealed pavement areas.*

- a) *Submit amended RPEQ plans demonstrating the above requirements*

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#### **Item 4 Response**

Amended civil engineering plans have been prepared by Milanovic Neale Consulting Engineers and are submitted with this response.

The MNCE response confirms that the proposed kerb and channel works include new kerb and channel along the Ipswich Road frontage, commencing on an 8.0m alignment and transitioning to a 4.25m alignment near the boundary with the adjoining sporting fields. The works extend around the corner into Archimedes Street and tie into the existing kerb and channel.

The amended RPEQ plans demonstrate the proposed road widening, kerb and channel works, and associated pavement widening. These plans should be referred to for the detailed design response to this item.

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#### **Item 5 –**

##### Refuse Collection

*It is noted the application states the existing refuse solution will remain. However, no refuse solution has been demonstrated on either the existing or proposed plans. A dedicated refuse storage area must be clearly identified and demonstrated.*

- a) *In accordance with PO17/AO17.2 of the Industry code and PO8/AO8.1 and AO8.2 of the Infrastructure design code, demonstrate on amended plans the existing or proposed refuse or solution.*

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#### **Item 5 Response**

The amended proposal documentation identifies the proposed refuse storage area for the development.

The MNCE response confirms that refuse storage is proposed within a 2.0m x 2.0m marked area inside the northern end of the building, with convenient access to the roller door and external hardstand area for collection.

The refuse arrangement is considered appropriate for the proposed industrial use and will allow refuse to be stored in a dedicated area without impacting vehicle manoeuvring, site circulation or the adjoining road network.

On this basis, the proposed refuse collection arrangement is considered to address PO17/AO17.2 of the Industry code and PO8/AO8.1 and AO8.2 of the Infrastructure design code.



**Item 6 –**

Air quality

*The proposed use and its location have the potential to affect the air quality amenity of nearby sensitive land uses and zones. Although an air quality report has been submitted and has correctly identified the need for assessment against the relevant air quality criteria, the report does not include any such assessment. The proposal is required to demonstrate that an acceptable level of air quality at the nearby sensitive zonings can be achieved, in accordance with the Industry code.*

- a) *The air quality report correctly identifies that the development does not comply with the separation distance specified in AO1.6 of the Industry code. Submit a revised Air Quality Report prepared in accordance with the Air Quality Planning*

**Item 6 Response**

An Air Quality Impact Assessment has been prepared by Vipac Engineers and Scientists Limited and is included as Attachment D.

The Vipac report has been prepared specifically to respond to Council's Information Request and provides a quantitative assessment of potential air quality impacts on surrounding sensitive land uses. The assessment has been undertaken in accordance with Council's Air Quality Planning Scheme Policy and assesses the proposal against the relevant requirements of PO1 of the Industry code.

The assessment considers the proposed spray-painting activities associated with the gas cylinder finishing process. The report adopts conservative assumptions, including maximum spray-painting activities over a full year of operation and upper-bound VOC component percentages for the proposed products.

The assessment includes emissions inventory preparation, air dispersion modelling and odour concentration predictions at sensitive receptors. It compares predicted impacts against the relevant air quality and odour criteria under the Brisbane City Council Air Quality Planning Scheme Policy and Industry code.

Vipac concludes that, despite the conservative nature of the assessment, predicted concentrations of all modelled pollutants are below the relevant health and odour-based criteria at all modelled sensitive receptors. The report therefore demonstrates that air quality impacts at surrounding sensitive land uses are within acceptable limits and that the requirements of PO1 of the Industry code are expected to be achieved.

**Item 7 –**

Hazard & Risk - Hazardous Goods

*The Preliminary Hazard Analysis prepared by Riskcon Engineering, dated 21/01/2026, has been reviewed. The following further information is requested to enable Council to sufficiently assess the application:*

- a) *Clarify whether the tankers stored on-site will have dangerous goods. Specify and include these dangerous goods in the assessment. A conservative worst-case assessment may be needed if the quantity or type of dangerous goods within the tankers vary.*
- b) *Confirm the industry threshold triggered by the development. Please refer to SC1.1.3 Industry thresholds and SC1.1.1 Defined uses in the City Plan 2014, and provide explanation taking consideration the type and quantity of dangerous goods and hazard and risk posed by the development.*



### Item 7 Response

An updated Preliminary Hazard Analysis has been prepared by Riskcon Engineering Pty Ltd and is included as Attachment E.

The updated Riskcon report addresses the dangerous goods and hazard risk matters associated with the proposed Coregas facility. The report confirms that the facility will be used for pressure testing oxygen bottles using a water-based system, storage of tankers that transport gases to customer sites, and the installation of carbon dioxide and liquid nitrogen vessels.

The Riskcon report confirms that the tankers stored on site will contain dangerous goods. Specifically, the site will accommodate four tankers, comprising three tankers containing liquid nitrogen and one tanker containing liquid oxygen. The relevant dangerous goods classes and quantities are addressed in the Riskcon report.

Riskcon has undertaken a Preliminary Hazard Analysis having regard to the relevant dangerous goods quantities, storage arrangements and risk profile of the proposed development. The report identifies potential hazards, undertakes consequence and frequency analysis where required, and compares the assessed risk against relevant criteria.

The report concludes that the conservative fatality risk at the site boundary is 2.54 chances per million per year, with lesser risk at further distances from the boundary. This is below the acceptable criterion of 10 chances per million per year for the adjacent sporting facility. Riskcon therefore considers that the proposed development is acceptable for the land use.

### Item 8 –

#### Fuel Burning

*The proposed development may include the use of fuel burning (e.g. back-up/emergency power generator, fire pumps, etc). Such uses are defined as “Fuel Burning” in Schedule 1 Definitions – Industry Thresholds.*

- a) *Submit further information outlining whether fuel burning is proposed. Such information is to include maximum fuel burning capacity in MW; potential hours of use, type and quantity of fuel stored, air quality controls and type of engine. (In some circumstances an Air Quality Report may be required demonstrating compliance with PO1 of the Industry Code).*

*NOTE - Amendment to the DA form and an amendment to the proposed application may be required if a new industry use/threshold is triggered*

### Item 8 Response

Coregas has reviewed the fuel-burning matter raised by Council and confirms that the proposed development does not include any backup power generator, emergency power generator, fire pump, or similar fuel-burning equipment.

No fuel-burning activity of the type referenced in Council’s Information Request is proposed as part of the development.

On this basis, there is no maximum fuel-burning capacity, no proposed hours of use, no fuel storage associated with such equipment, no engine type, and no separate air quality controls required for fuel-burning equipment.

Accordingly, the Applicant does not consider that a separate Fuel Burning industry threshold or additional industry use is triggered.

**Item 9 –**

Landscaping

Onsite landscape amenity is required to be demonstrated by providing new landscape treatments as required under *PO13 Industry code*.

- a) *Provide a 2m wide landscape bed located along the property boundary for both street frontages (e.g. between the tanker parking and fencing to meet the landscape amenity requirements under the code).*

**Item 9 Response**

The amended proposal plans have been updated to include additional landscaping in response to Council's request.

The amended proposal plans include a 1.23m wide garden bed along the Archimedes Street frontage. This width has been adopted so that the new landscaping aligns with the existing landscape treatment along the broader Archimedes Street frontage of the site, rather than creating an inconsistent frontage condition.

The landscape treatment then expands around the corner and along the Ipswich Road frontage to approximately 4m in width. This provides a more substantial landscape outcome to the most visually prominent part of the site and improves the presentation of the development to both road frontages.

The amended proposal plans are prepared by Pacifik Design Studio, Revision 3, and show the additional garden bed treatment on Sheet 01, Site Plan - Proposed.

While Council's Information Request refers to a 2m wide landscape bed along both street frontages, the amended plans provide a practical landscape response that balances Council's request with the existing frontage condition and the operational requirements of the Special industry use. This includes the need to maintain safe and functional heavy vehicle access, tanker parking, manoeuvring areas, acoustic fencing and the sheet metal barrier recommended through the hazard and risk assessment process.

The proposed landscaping is considered to appropriately respond to PO13 of the Industry code by improving onsite landscape amenity while maintaining the functional and safety requirements of the proposed Special industry use.

Further details are shown on the amended proposal plans submitted as Attachment A.