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HPC Ref: 22387
Office of Coordinator General Ref: AP2022/023

7 February 2023

Sent via: email

Office of the Coordinator General
1 William Street
Brisbane QLD 4000

Attention: John Seguerra
sdainfo@dcdip.qld.gov.au

Dear John,

Information Request response: SDA Application for a Material change of use (MCU) for an Office in the Bromelton State Development Area over land at 228 Brookland Road, Allenvue QLD 4285, described as Lot 12 on SP186526.

We write on behalf of the applicant, Jimboomba Turf Group to provide a full formal response to the Office of the Coordinator General's Information request dated 3 January 2023.

The following supporting information is enclosed with this response to the Information Request:

- **Appendix A:** Wastewater management plans prepared by *Stav's Hydraulic Services*
- **Appendix B:** Amended planning report with correct site plan detail by *HPC Planning*

The individual matters raised within Council of the City of Gold Coast's Information Request are addressed in turn below.

1. SDA wide assessment criteria

The Town Planning Report (Reference 22387), prepared by HPC Planning and dated November 2022, provides some assessment of the proposed development against the Bromelton SDA Development Scheme, however, omits a full assessment of the SDA wide assessment criteria.

The proponent is requested to assess the proposed development against Part 2, Section 2.5 – SDA wide assessment criteria, of the Bromelton SDA Development Scheme.

Response:

As requested, a full assessment against Part 2, Section 2.5 – SDA wide assessment criteria, of the Bromelton SDA Development Scheme is provided as follows:

2.5.1 Services

(1) Development maximises the use and minimises the costs for infrastructure associated with telecommunications, transport, water, wastewater, recycled water and energy.

The site is already connected to available infrastructure networks, provision of additional infrastructure is not required for the establishment of the use. Water and Sewer treatment infrastructure is to be provided on-site. Refer to the proposed Wastewater management plans at **Appendix A**.

(2) Development plans for and addresses the impacts of the development on existing and future planned telecommunications, transport, water, wastewater, recycled water and energy networks.

The proposed development seeks only to replace the existing administration building with a new administration building and will not conceivably cause undue impacts on any infrastructure network.

(3) Development is adequately serviced by telecommunications, transport, water, wastewater, recycled water and energy networks as relevant.

The site is connected to the available infrastructure networks. As the proposal seeks to replace the existing administration building with a new administration building, there is no substantial increase to loading on any of the existing service networks. As requested, the proposed wastewater treatment regime has been provided as part of this correspondence and is included at **Appendix A**.

(4) Development is to avoid or minimise adverse impacts on existing or proposed state or local government services.

The proposed development will not result in adverse impacts on existing or proposed state or local government services.

(5) Development is located, designed and constructed to avoid or mitigate potential flood damage, ensure no net worsening, avoid risks to public safety, and not adversely impact on transport and service infrastructure.

The proposed development is located to avoid flood impacts and does not result in net worsening, avoids risks to public safety, and does not adversely impact on transport and service infrastructure.

2.5.2 Transport

(1) Increased traffic arising from development is either able to be accommodated within existing road networks, or works are undertaken to minimise adverse impacts on existing and future infrastructure networks.

The proposed development seeks to replace the existing administration building with a new administration building and will not increase traffic to the site. The following metrics are provided for the understanding of the office of the Coordinator General and reflect the existing operation of the site.

The maximum full time/ part time staff working inside the office building: 10.
The maximum onsite farm/driver staff utilising the kitchen and toilet facilities: 20.
Maximum visitor numbers during a typical working day: 5-10.

It is highlighted that the primary land use and operation of the site is not proposed to change as a result of this application.

(2) Development is established to take advantage of proximity to appropriate transport routes and does not adversely impact on the safe and efficient functioning of the Sydney-Brisbane Rail corridor as well as integrated rail and road transport routes.

The proposed development will not impact upon the safe and efficient functioning of the Sydney-Brisbane Rail corridor or the integrated rail and road transport networks.

(3) Local road networks within the Bromelton SDA are to be designed to accommodate the proposed vehicle type and predicted traffic volumes associated with the development and the precinct/s.

As stated above, the proposal only seeks to replace the existing administration building, the primary land use and operation of the site are to remain generally unchanged. Traffic to the site is consistent with the historic operation of the site.

(4) The establishment and operation of existing and planned transport infrastructure is not compromised.

As stated above, the proposal only seeks to replace the existing administration building, the primary land use and operation of the site are to remain generally unchanged. The proposal does not compromise existing or planned transport infrastructure.

(5) Sufficient car parking, vehicular manoeuvring and off-street loading/unloading facilities, which are adaptable to a variety of uses, are provided within the development site.

As there is no prescribed rate under the Development Scheme, guidance is taken from the Scenic Rim Planning Scheme, which applies a car parking rate for “Office” of one car parking space per 30m² of Gross floor area (GFA). Per that definition under the scheme, the GFA for the proposed office building is approximately 277m², rounded up to 300m² for simplicity, necessitating 10 car parking spaces to be established on the site, which would generally include one PWD parking space. An additional two car parking spaces (or more if deemed necessary) are proposed to be provided for visitors.

Further to discussions with Officers, there is ample car parking area available within the site. Car parking availability will clearly not cause any issues due to the abundance of level ground to park vehicles. Considering the very large site area and rural nature of the property it is not considered necessary to provide formalised car parking areas (drained, sealed, line marked). This would result in an unnecessary increase in hardstand area.

The general areas where car parking is provided is indicated in the figure below. If required Officers are requested to provide a condition of approval for car parking spaces to be provided and maintained in accordance with the rates above.

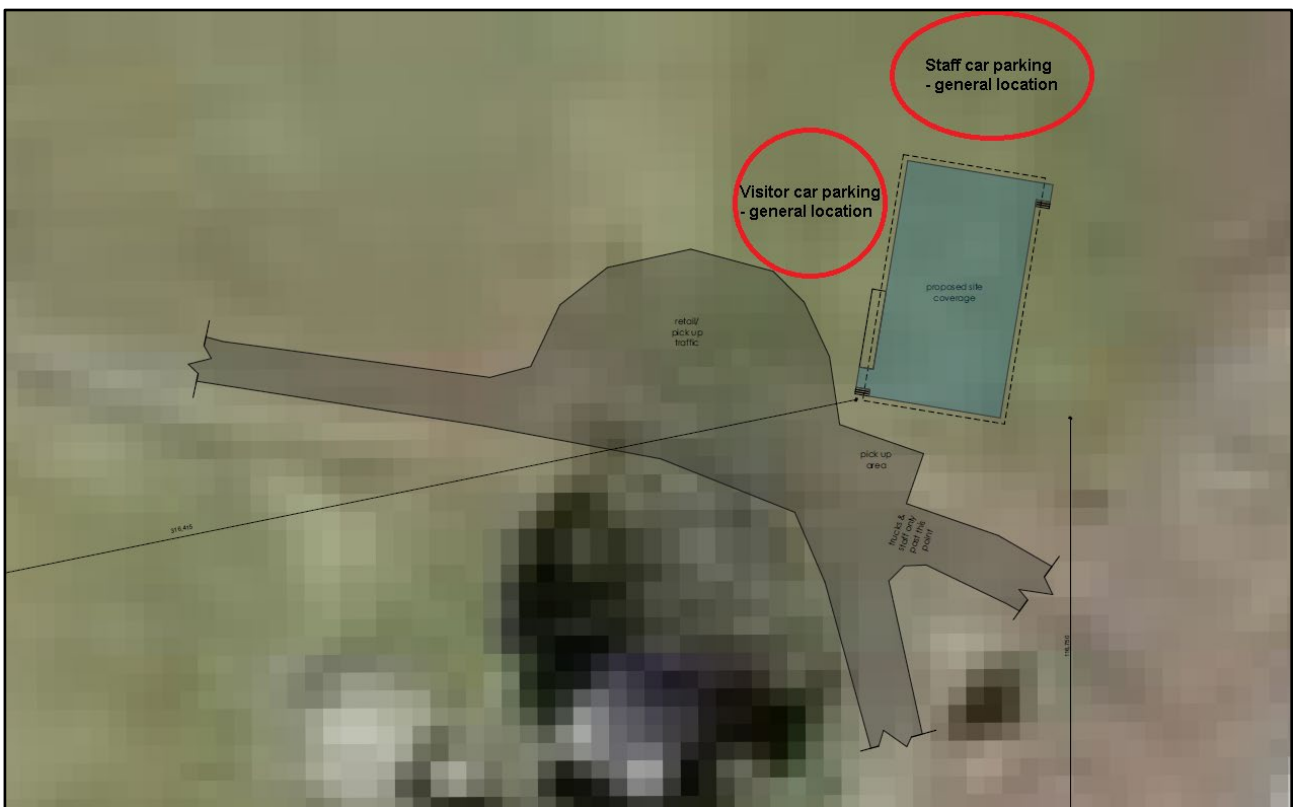


Figure 1: Car parking general locations – Extract from Site Plan by Cyber Drafting & Design

(6) Development is designed to facilitate safe and efficient vehicular ingress and egress and does not unduly impact on the safe and efficient operation of external roads, rail, transport infrastructure or services.

No changes are proposed nor required to the existing vehicle ingress and egress arrangement.

(7) Rail spurs and sidings are designed in accordance with appropriate design standards.
Not applicable.

2.5.3 Character and amenity

(1) Visual impacts of development are minimised through building design, materials and landscaping when viewed from a significant publicly accessible viewpoint such as major roads.

The proposed building is located over 300m from the road front and will not conceivably cause adverse visual impacts.

2.5.4 Emissions

(1) Development is designed to avoid or minimise:

(a) adverse impacts from air, noise and other emissions that will affect the health and safety, wellbeing and amenity of communities and individuals and

The proposed development will not increase air, noise or other emissions.

(b) conflicts arising from (but not limited to), spray drift, odour, noise, dust, light spill, smoke or ash emissions with sensitive and/or incompatible land uses.

The proposal will not increase emissions as it is for the replacement of an office building only.

(2) Development supports the achievement of the relevant acoustic and air quality objectives of the Environmental Protection (Noise) Policy 2008 and the Environmental Protection (Air) Policy 2008.

The proposal will not increase emissions as it is for the replacement of an office building only.

(3) Development with high levels of emissions is to, in accordance with current best practice, avoid adverse impacts on the cumulative air quality¹ of the Bromelton air shed.

The proposal will not increase emissions as it is for the replacement of an office building only.

2.5.5 Natural hazards – flooding

(1) Development, in accordance with current best practice, is to:

(a) achieve an appropriate level of flood immunity and

It is noted there is some minor mapped flooding along the site frontage and there is no flood free access/ egress along Brookland Road. However, the access and egress arrangement is to remain unchanged as part of this proposal, which has historically been sufficient to provide suitable access/ egress to the site. During times of heavy inundation, operations on the site cease.

(b) not adversely affect existing flow rates, flood heights or cause or contribute to other flooding impacts on upstream, downstream or adjacent properties. This includes potential impacts from changes to stormwater flows and local flooding.

The small scale building is raised above the flood level on stumps to allow any very minor flows to be conveyed as per the pre-development scenario. The proposed development would not conceivably cause impacts or changes to stormwater flows.

(2) The risk of, and the adverse impacts from, flooding are avoided, minimised or mitigated to protect people and property, and enhance the community's resilience to flooding.

The proposed development does not increase the risk of, or adverse impacts from flooding.

(3) Development maintains the safety of noxious and hazardous materials and chemicals manufactured or stored in bulk during flood events.

The application is for the replacement of the administration building and does not propose storage of hazardous materials.

2.5.6 Natural hazards – other

(1) Development, in accordance with current best practice:

(a) identifies relevant natural hazards that may impact upon the development

The replacement of the administration building does not increase/ change natural hazard risk/ severity.

(b) appropriately manages risk associated with the identified hazards and

The replacement of the administration building does not increase/ change natural hazard risk/ severity.

(c) avoids increasing the severity of the natural hazard.

The replacement of the administration building does not increase/ change natural hazard severity.

(2) Development within the sunny day failure extent of the Bromelton Offstream Storage is designed and sited to be compatible with the risk to public safety and property associated with a failure of the facility.

Note: Further details on the Bromelton Offstream Storage facility, including mapping and information on the level of risk are available in the Bromelton Dam Emergency Action Plan.

Not applicable.

2.5.7 Contaminated land

(1) Development on land likely to be contaminated or recorded on the Environmental Management Register or Contaminated Land Register does not adversely impact on human health or the environment by exposure, management, or movement of contaminants.

Not applicable. The land is not recorded on the contaminated land/ environmental management register.

(2) Where required, develop a strategy to manage any existing contamination and the potential for additional contamination such that human health and the environment are not adversely affected.

Not applicable.

2.5.8 Water quality

(1) Development, consistent with the Environmental Protection (Water) Policy 2009, avoids potential adverse impacts on the environmental values and water quality objectives of receiving waters, arising from:

(a) altered stormwater quality or flow

The proposed small-scale administration building will not impact on stormwater quality or flows.

(b) wastewater (other than contaminated stormwater and sewage) and

The proposed Wastewater regime is demonstrated in the Wastewater management plans prepared by Stav's Hydraulic Services included at Appendix B. The proposed septic trenches are located over 100m from the nearest watercourse.

(c) the creation or expansion of non-tidal artificial waterways.

Not applicable.

(2) Development protects the ecological and hydraulic function of water assets within and adjacent to the Bromelton SDA.

The proposed small-scale office building will appropriately maintain the hydraulic function of water assets within and adjacent to the Bromelton SDA.

(3) Development incorporates current best practice integrated water cycle management strategies and integrates water sensitive urban design principles.

Can comply – to be conditioned at Officers' discretion if deemed necessary.

2.5.9 Energy and water efficiency

(1) Where practicable, building, site design and layout maximises energy efficiency, having regard to:

- (a) building orientation and passive solar design*
- (b) natural lighting opportunities*
- (c) maximising cross ventilation*
- (d) provision of sun shading devices at north, west and east facing windows and doors and*
- (e) landscaping treatments to the western side of the building.*

The location and orientation of the building is necessitated by the existing layout of the site, however the proposed building is designed to utilise natural lighting and cross-ventilation through orientation and layout. Large verandahs are provided to provide sun shading.

(2) The use of reticulated water supply is minimised through the use of alternative water supply sources, including:

- (a) rain water harvesting and*
- (b) recycled water sources.*

The existing operation of the site utilises a series of rainwater tanks for rainwater harvesting and reuse. Roof water from the new proposed administration building is to be captured and reused via a new rainwater tank. It is requested that a condition of approval be included for the establishment of a new rainwater tank for the new building.

2.5.10 Climate change

(1) Development minimises its emission of greenhouse gases and demonstrates how it will adapt to projected climate change conditions.

The new proposed administration building will not cause greenhouse gas emissions to a greater degree than other new buildings, please provide a condition of approval if deemed necessary.

2.5.11 Environment, cultural heritage and community

(1) Environmental values, cultural heritage values and community values of the site on which the development is undertaken and immediate surrounds are identified and protected, consistent with current best practice.

Note: Duty of Care Guidelines under Section 28 of the Aboriginal Cultural Heritage Act 2003 should be considered a minimum requirement of all development.

The replacement of the administration building does not impact upon environmental values, cultural heritage values or community values.

(2) Development is designed to avoid the clearing of regulated vegetation. Where avoidance is not possible, minimise clearing to:

- (a) avoid land degradation*
- (b) avoid the loss of biodiversity and*
- (c) maintain ecological processes.*

The proposed development does not require clearing of vegetation.

(3) Development is designed and sited to:

- (a) minimise impacts on matters of local and state environmental significance*
- (b) maintain ecological connectivity and avoid fragmentation of matters of local and State environmental significance*
- (c) avoid or minimise impacts to the movement of fish (fish passage) along waterways.*

The proposed development does not impact upon matters of environmental significance.

(4) Where the development requires a buffer to mitigate the environmental impacts of the development, that buffer must be accommodated within the development site.

Note: Examples of buffers for (4) above, may be a vegetated screen to mitigate the visual impacts of a large industrial facility from a public road; or retaining additional vegetation around a protected flora species; or buffer to the curtilage of a listed cultural heritage site.

Not applicable.

(5) Development avoids significant adverse environmental impacts on matters of national or State significance, or where significant impacts cannot be reasonably avoided they are minimised. Any residual significant adverse impacts are offset in accordance with the relevant commonwealth or Queensland environmental offset framework.

Not applicable.

(6) The ecological values associated with the Logan River, Allan Creek and Sandy Creek shall be protected and enhanced.

Not applicable.

2.5.12 Built form

(1) The scale and character of built form is consistent with surrounding areas and the preferred land use intent of the precinct.

The scale and character of the proposed administration building is consistent with surrounding areas. The building is to be setback from the road frontage by over 300m.

(2) Development incorporates high quality urban design treatments to help integrate the building into the surrounding environment.

The proposed building provides a very high quality built form composition consistent with other typical rural buildings in the area.

(3) Development contributes to a high standard of amenity.

Development has negligible amenity impacts owing to siting and location. Notwithstanding the building provides an attractive built form composition consistent with surrounding character and amenity expectations.

(4) Development must be designed and built in accordance with current best practice.

Development designed in accordance with best practice.

2.5.13 Other government matters

(1) Development is to demonstrate consistency with other relevant legislative requirements that may be required for the development to proceed and operate and to the extent practicable, be consistent with regional plans, the State Planning Policy and the State Development Assessment Provisions where the State interests articulated by these instruments are likely to be affected by the development.

The proposal is consistent with Shaping SEQ, SPP and SDAP – refer to planning report.

(2) Development is to avoid or minimise adverse impacts on existing or proposed state or local infrastructure.

The proposed development will not impact significantly on state or local infrastructure.

2.5.14 Landscaping

- (1) Development provides landscaping that:
- (a) minimises the visual impacts of the development
 - (b) incorporates at least 50% local species and
 - (c) is low maintenance.

The established landscaping provided along the site's frontage is to remain, as will the existing internal landscaping. The proposal is for the establishment of a new administration building only, setback 300m from the road frontage. Additional landscaping is not required for visual softening.

2.5.15 Engineering standards

- (1) Development is to be designed and constructed in accordance with the relevant engineering standards (and any subsequent revisions to the relevant standards) stated in Table 7 below. Alternative, innovative solutions that demonstrate compliance with the relevant standards are encouraged.
Condition at Officers' discretion.

2. Services

Section 2.3 of the Town Planning Report states the property is not serviced by reticulated sewer or water supply, however section 3.6.5 states the property is 'adequately serviced'.

The proponent is requested to outline the

- water supply for the site, including for firefighting purposes
- sewerage service for the site, including location and details of any onsite sewerage treatment plant

Response:

The proposed wastewater treatment and disposal regime is illustrated in the Wastewater management plans prepared by Stav's Hydraulic Services and included at **Appendix A**.

The site currently contains a system of tanks for water collection and reuse on the site. There are no changes proposed to the existing regime on the site as part of the proposed development, other than a new proposed tank for rainwater collection for the new proposed building. If deemed relevant by the Office of the Coordinator General, a condition of approval may be included for the provision of additional tanks for rainwater capture for the new administration building.

4. Construction

The proponent is requested to provide information on how impacts during construction will be managed.

Response:

If deemed necessary, it is requested that a condition of approval be included requiring the provision of a basic construction management plan prior to the commencement of works on the site.

5. Details of proposed development

The proponent is requested to provide:

- number of staff and visitors onsite
- hours of operation
- an indication of car parking on the site, including visitor or disabled parking areas where relevant
- details of refuse (rubbish) generation and proposed storage and disposal

Response:

Note, this application does not seek to change the existing operational characteristics for the farm or increase the scale of operation. The proposal is for the establishment of a new administration building *only*, to replace the existing administration building (to be decommissioned for storage). The additional detail below is provided for Officers' information only in relation to the existing operation of the site.

- *number of staff and visitors onsite*

Maximum staff numbers are categorised as follows:

1. Full time/ part time office staff (working from the proposed building) – 10
2. Onsite farm workers/ driver staff who will utilise the kitchen and toilet facilities – 20
3. Visitors – These numbers vary from week to week but generally expect approximately 5-10 (maximum) per working day.

- *hours of operation*

Hours of operation for the administration building are as follows:

1. 7am-5pm – Monday to Thursday;
2. 7am-4pm – Fridays;
3. 7am-12pm – Saturdays;
4. No operation (closed) on Sundays.

- *an indication of car parking on the site, including visitor or disabled parking areas where relevant*

It is noted the SDA Development Scheme states:

(5) Sufficient car parking, vehicular manoeuvring and off-street loading/unloading facilities, which are adaptable to a variety of uses, are provided within the development site.

As there is no prescribed rate under the Development Scheme, guidance is taken from the Scenic Rim Planning Scheme, which applies a car parking rate for "Office" of one car parking space per 30m² of Gross floor area (GFA). Per that definition under the scheme, the GFA for the proposed office building is approximately 277m², rounded up to 300m² for simplicity, necessitating 10 car parking spaces to be established on the site, which would generally include one PWD parking space. An additional two car parking spaces (or more if deemed necessary) are proposed to be provided for visitors.

As discussed above, there is ample space within the site to accommodate any additional car parking spaces deemed necessary by the Office of the Coordinator General. Further to our discussion, it is requested a condition of approval is provided to ensure carparking is provided and maintained onsite in accordance with the aforementioned rate. The general location of visitor and staff carparking is indicated in the figure below.

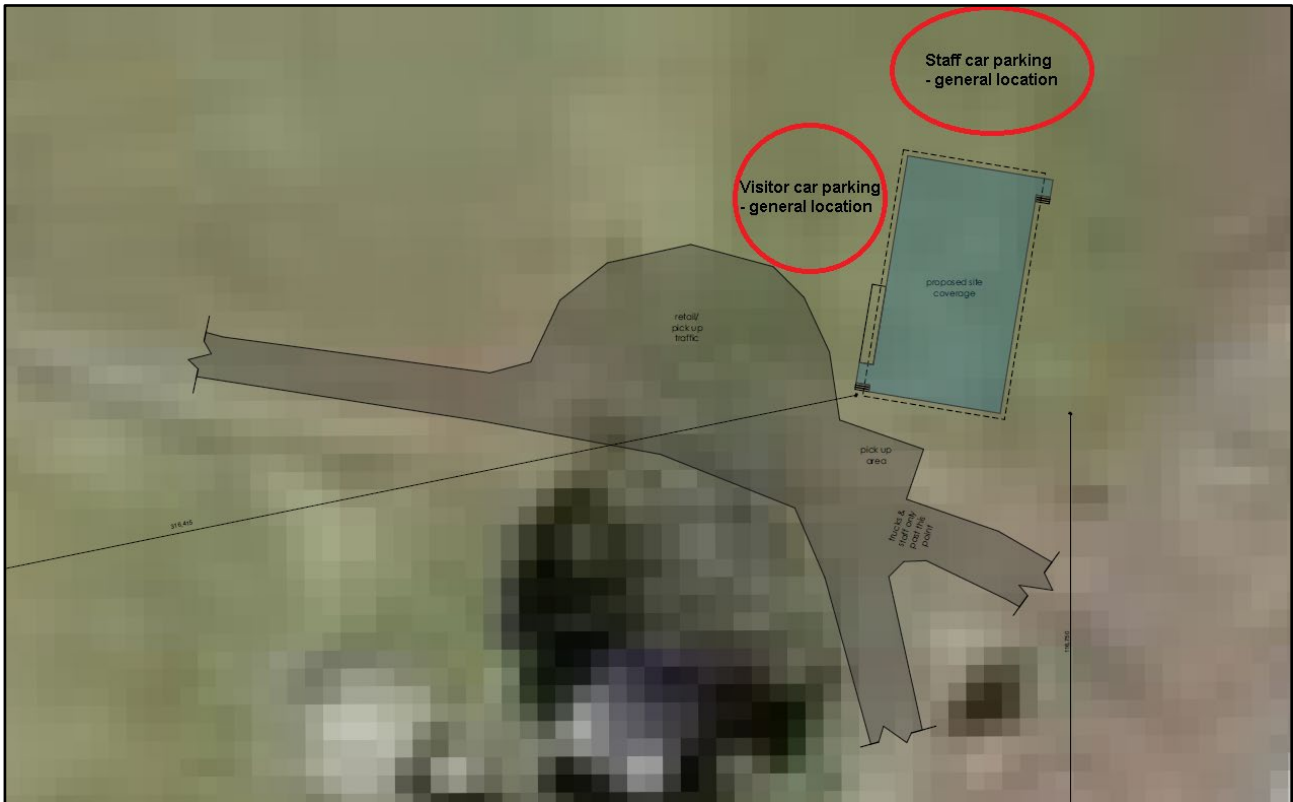


Figure 2: Car parking general locations – Extract from Site Plan by Cyber Drafting & Design

- details of refuse (rubbish) generation and proposed storage and disposal

Jimboomba Turf Farm has an existing private arrangement with waste management company JJ Richards whereby bulk storage bins are collected from the site. This arrangement is demonstrated to be adequate to meet the waste collection needs of the farm over years and is not proposed to change as a result of replacing the administration building.

6. Strategic Vision

The Town Planning Report assesses the proposed development against part of the Strategic vision for the Bromelton SDA.

The proponent is requested to assess the proposed development against all of Part 2, Section 2.2 – Strategic vision for the Bromelton SDA.

Response:

The strategic vision relates largely to industrial development. The proposal seeks to establish an office to support a rural use, within the rural precinct. a) to e) & g) are generally not relevant as stated in the HPC planning report. For completeness a response is provided to each below.

- a) *establish Bromelton as a major industrial area for industrial development of regional, State and national significance*

Not applicable. The development is for the replacement of an administration building to support a rural use in a rural precinct.

- b) *encourage industrial development and support services to take advantage of the access to key rail and road networks*

Not applicable. The development is for the replacement of an administration building to support a rural use in a rural precinct.

- c) *maximise opportunities for the clustering and co-location of synergistic developments, including supporting infrastructure*

Not applicable. A new office is required to support an existing rural land use.

- d) *maximise the utilisation of the rail network by establishing multi modal freight and logistics operations, manufacturing and warehousing facilities, and industries that are reliant on rail access*

Not applicable. The development is for the replacement of an administration building to support a rural use in a rural precinct.

- e) *encourage activities that require large lots, separation distances or other specialist needs*

The existing activity requires a large lot and separation distances and therefore supports this criterion.

- f) *protect the continued operation and future development of existing industrial activities, appropriately located rural activities and the regionally significant extractive resources within the Bromelton SDA from incompatible development and encroachment and*

The proposed development seeks to establish an administrative office building to support the ongoing operation of the Jimboomba Turf Farm, a Cropping land use anticipated within the Rural precinct. As such the proposal protects and supports the continued operation and future development of an appropriately located rural activity and serves to support the strategic vision of the Bromelton SDA.

- g) *leverage the opportunities created by the proximity of the Bromelton SDA to the Beaudesert centre, by fostering synergies between industry and business activity clusters.*

Not applicable. The development is for the replacement of an administration building to support a rural use in a rural precinct.

7. Current Administration Building

The Town Planning Report states that Jimboomba Turf (the proponent) currently uses an existing shed on site for administrative functions, which the proposed development is intended to replace.

The Town Planning Report, however, does not discuss the future use and operation of the existing shed, or whether it is proposed to be demolished.

The proponent is requested to provide additional details about the intended future use and operation of the existing shed and/or whether it is proposed to be demolished.

Response:

The existing administration building is to be decommissioned for use as a storage building only. There are no administrative activities proposed to occur from the existing building after the establishment of the new proposed office building. Condition at Officers' discretion.

8. Proposed Plans

The Town Planning Report illustrates the overall site plan prepared by Cyber Drafting & Design (Figure 2) and Site Plan – Proposed Administrative Office Location (Figure 3), on page 2.

The proposed site as illustrated in the Town Planning Report differs to the Proposed Plans document (Job No. 220610, Revision B), Sheet 2, titled Proposed Site Plan, prepared by Cyber Drafting & Design.

The proponent is requested to amend the planning report and/or attachments to clarify the location of the proposed office building and update any other project details as required.

Response:

The proposal plans by Cyber Drafting & Design correctly reflect the proposed development. It is noted that a previous version of the site plan was erroneously included in the HPC Planning report. The planning report has been updated for consistency with the proposal plans. Refer to **Appendix B**.

All of the information requested has been provided as part of this correspondence. Please proceed with the assessment of the application.

If you have any questions, please do not hesitate to contact the office on 0437 475 162.

Yours sincerely,
HPC Planning
A.B.N. 48 107 272 757



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