Economic Development Queensland



Greater FlagstonePriority Development Area

Submissions Report



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Economic Development Queensland

Department of State Development, Infrastructure, Local Government and Planning

GPO Box 2202, Brisbane, Queensland 4001. 1 William Street Brisbane Qld 4001 (Australia)

Phone: 13 QGOV (13 7468)
Email: edq@dsdilgp.qld.gov.au
Web: www.edq.qld.gov.au

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1 Introduction

The proposed Greater Flagstone Priority Development Area (PDA) draft Development Charges and Offset Plan (DCOP) was publicly notified for 30 business days from 7 March to 5:00pm on Tuesday 22 April 2022.

Following the completion of the public notification period:

- all submissions received were reviewed by the Minister for Economic Development Queensland (MEDQ), and
- the Greater Flagstone PDA DCOP was changed where considered appropriate in response to submissions received.

This report has been prepared to summarise the submissions that have been considered and provides information on the merits of the submissions and the extent to which the DCOP has been amended.

2 Overview of public notification process

2.1 Community engagement

The public notification period for the Great Flagstone PDA draft DCOP took place between 7 March to 5:00pm on 22 April 2022. During the public notification period the following community engagement initiatives were implemented:

• A Department of State Development, Infrastructure, Local Government and Planning (DSDILGP) 'Have Your Say' (HYS) webpage for the Greater Flagstone DCOP.

The HYS page included:

- Downloadable copies of draft DCOP and the draft Infrastructure Planning Background Report (IPBR) which summarises the technical studies undertaken in the development of the DCOP
- FAQs for the Great Flagstone PDA draft DCOP.
- Information on the Greater Flagstone PDA page on the DSDILGP website
- Public notice advertisement on the <u>DSDILGP Greater Flagstone PDA</u> web page
- Online public notice advertisements in The Courier Mail

Page Views: 378

Visitors: 44

Downloaded at least a document: 32

Library downloads

Downloads

- 23 downloads of the draft Development Charges and Offset Plan (DCOP)
- 34 downloads of the Greater Flagstone PDA Combined Maps
- 10 downloads of the FAQs
- 19 downloads of the draft Infrastructure Planning Background Report (IPBR)

2.2 Submission registration and review process

Submissions were received by email. Once submissions were received, they were registered and reviewed.

Table 1 below provides an overview of the submission registration and review process.

Table 1: Submission registration and review process

Steps	Action
Classification of submissions	Submissions were classified by number and section relevant to the Development Charges and Offset Plan.
Summarising submission issues	Each submission was read, and the different matters raised were entered into the submissions database under headings based on the sections of the Development Charges and Offset Plan.
	Each submission often covered several topics; therefore, allowance was made for the same or similar comments being raised in several submissions. This included receipt of multiple submissions with similar views on a topic or submissions having different views on the same topic. For this reason, comments across submissions on topics were identified and these comments were summarised under common headings based on the sections of the Development Charges and Offset Plan in the submissions report.
Evaluation and responses to issues	Once all comments were summarised, they were assessed, and responses were prepared.
	Potential changes to the Development Charges and Offset Plan were identified.
	In evaluating submissions, allowance was made for the same or similar

	comments being raised in different submissions. For this reason, assessment of comments and resulting development scheme changes were made based on the sections of the Development Charges and Offset Plan rather than on a submission-by-submission basis.
Submission report	The submissions report was prepared, providing a summary of the submissions considered, information about the merits of the submissions, recommendations for changes to the Development Charges and Offset Plan to reflect submissions.
	Comments raised through submissions have been summarised to simplify the presentation and review comments.
MEDQ approval	The final submissions report and Development Charges and Offset Plan were submitted to the MEDQ for review and approval.
Publishing and notification of Development Charges and Offset Plan.	As soon as practicable after the MEDQ approved the Development Charges Offset Plan, the MEDQ published the Development Charges Offset Plan.

3 Overview of submissions

3.1 Submission numbers

A total of 16 submissions were received by EDQ, 14 during the public notification period and 1 additional submission after the public notification period ended.

3.2 Submission method

Table 2 below identifies the method by which submissions were lodged with EDQ.

Table 2: Breakdown of submissions by submission method

Method of submission	Number of submissions received
Post	0
Email	13
Online submission	3
Total submissions	16

3.3 Submitter interest in the PDA

A breakdown of the submissions by interest is outlined in Table 4 below.

Table 3: Breakdown of submissions by interested party

Type of submitter	Number of submissions received
Resident	0
Business, Public-sector entities and other organisations	16
Total submissions	16

3.4 Overarching areas of support or concern

- General
- State community facilities
- Transport
- Water
- Sewer
- Parks and open space
- Local community facilities
- Mapping

4 Summary of submissions and amendments

#	Summary of Issue	Response
CATEG	GORY: GENERAL	
1.	Proposal to undertake exercise with EDQ to establish a guideline for state community land acquisition within the Greater Flagstone PDA.	No change. Further discussions to be held between EDQ and State Agencies in relation to the need for a guideline.
2.	The Desired Standard of Service for "state primary schools" and "state secondary schools" within of PDA Guideline 11 - Community Facilities are outdated and should be updated to reflect current policy.	No change. Not in scope of the DCOP. It is envisaged several guidelines are to be reviewed following finalisation of the DCOP.
3.	Fundamentally do not support a DCF in the current format as the use of a WACC to Capital expenditure provided by developers is inappropriate and an incorrect use of a DCF. It unnecessarily penalises the developers who are funding the infrastructure with a risk factor that the developers already incur.	No change. The use of the WACC is consistent with government policy. EDQ considered and reviewed the operation of the WACC on the DCOPs. It is not intended to remove the WACC from the financial modelling The debt level identified in the modelling reflects the projected growth modelling which was informed by developer cohort input. The DCOP is proposed to be reviewed every five years which will include a review of the financial modelling.
4.	Request EDQ infrastructure delivery be subject to a Discounted Cashflow (DCF) approach, and associated charges premium, while infrastructure delivered by developers is not included in the DCF.	No change. The use of the WACC is consistent with government policy. EDQ considered and reviewed the operation of the WACC on the DCOPs. It is not intended to remove the WACC from the financial modelling
5.	The proposed infrastructure delivery is too aggressive and needs to be reviewed to a more realistic and commercial level.	No change. EDQ has provided and consulted with developers over the past 2 years on the SGS report and has continued to utilise it as a base for all network planning. This is intended to be reviewed as part of each 5 yearly review.

#	Summary of Issue	Response
6.	Request EDQ:	No change.
	 Utilise a cashflow which reflects EDQ's actual exposure only, or Utilise the overall infrastructure cashflow but utilise a risk (not a WACC as it is not EDQ's capital) factor that represents the real risk to EDQ, which would as demonstrated above, would be very small. 	The use of the WACC is consistent with government policy. EDQ considered and reviewed the operation of the WACC on the DCOPs. It is not intended to remove the WACC from the financial modelling.
		If risk is not managed through an applied DCF model, there is a significant risk that expenditure may exceed revenues, particularly when cost of constructing infrastructure increases over time.
7.	the DCOP needs to record any formulas for deriving the risk	No change.
	(WACC or other) factors and any multipliers of standard rates, such as government bond rates where used, and for any other inputs or assumptions used in the modelling.	The risk factor identified as the WACC is identified in the IPBR, no further assumptions are deemed necessary to be displayed.
8.	Yield is 10% lower than anticipated. Request to update	No change.
	demographics to align with information provided and account for the understated yield when assessing inclusion of road infrastructure which falls marginally short of offset eligibility criteria.	EDQ has provided and consulted with developers over the past 2 years on the SGS report and has continued to utilise it as a base for all network planning. This is intended to be reviewed as part of each 5 yearly review. Any infrastructure that requires increases in scope prior to the 5 yearly reviews may be subject to a provisional offset.
9.	it is requested that an independent audit be carried out on the model, and the results are provided annually to the developers in the form of a peer review.	No change.
		The DCOP is proposed to be reviewed every five years which will include a review of the financial modelling.
10.	Request the opportunity to explore the DCF matter further with	No change.
	EDQ before this matter is finalised and adopted.	The use of the WACC is consistent with government policy. EDQ considered and reviewed the operation of the WACC on the DCOPs. It is not intended to remove the WACC from the financial modelling.
11.	DCOP Clause 1.5 - Any existing Provisional	The 24-month currency has been maintained however existing Provisionals
	Infrastructure Offset will continue to apply for 24 months of the adoption of this DCOP taking effect. Request that:	associated with already approved Development Approvals have been incorporated into DCOP costs on a case-by-case basis.

#	Summary of Issue	Response
	 The clause be amended to allow a 60-month period. Also need clarity in the document that where a provisional offset does exist, then this does not preclude offset claims under the more up to date DCOP. 	2. Where provisional offsets are approved under the ICOP, the final offsets would be assessed against the provisional within the 2-year transitional period.
12.	DCOP Clause 2.8 - Add clarification to Clause 2.8 that the charge payable can be reduced by unused infrastructure offsets.	DCOP has been amended to reflect the charge can be reduced by unused offset.
13.	DCOP 2.13 – Special Infrastructure Levy – The SIL was originally	No change.
	proposed to assist with the funding of subregional infrastructure which has now been superseded by the Subregional IA. It is therefore not required.	Under Clause 116B of the EDQ Act, the SIL is required to be identified. EDQ currently has no intention of utilising the SIL to fund infrastructure identified within the DCOP.
14.	In a recent DCF workshop with the landowners, EDQ	No change.
	confirmed that the timing of landowners receiving offsets Include wording in the DCOP to reflect this position in Clause 3.1.	Where trunk infrastructure works are completed by an applicant ahead of when they would normally be required, the final offset amount cannot be utilised (i.e., applied as an offset against infrastructure charges payable) until such time as that trunk infrastructure would have normally been required.
15.	It is now current practice that owners' costs final offset is automatically offset at 13% of the construction costs without requiring evidence.	No change. Evidence will be required to be provided as identified in the Offsets Assessment Guideline.
16.	DCOP Clause 3.2 - Amend the wording within Clause 3.2 to the following: ii. carrying out temporary or sacrificial infrastructure works unless it is required for the delivery of the infrastructure and/or can be demonstrated to provide a more cost-effective or safer solution to the delivery of staged infrastructure.	No change. Interim works in accordance with our guidelines, where part of the ultimate design is intended to be offsetable.

#	Summary of Issue	Response
17.	DCOP Clause 3.2 - Amend to the wording to the following: iii. relocation of identified and unidentified utilities, unless require delivering the infrastructure.	No change. Where relocations form part of the ultimate design the works are intended to be offsetable.
18.	DCOP Clause 3.2 - Amend to the wording to the following: v. decommissioning, removal and rehabilitation of infrastructure, unless required to deliver the infrastructure.	No change. Decommissioning of temporary infrastructure not part of an agreed works contribution is not considered offsetable.
19.	DCOP Clause 3.2 - Amend to the wording to the following: xvi. a cost of maintaining an infrastructure beyond that required by development conditions.	No change. Maintenance unless identified within IPBR for infrastructure will not be offset.
20.	The delivery of an implementation strategy and annual monitoring reports is an integral part of the implementation delivery and has previously been approved as offsetable. Clause 3.4 (i) to be deleted.	Annual Monitoring Reports and Implementation Plans to be considered offsetable and the DCOP has been amended to reflect this.
21.	DCOP Clause 3.5 - This clause appears to limit the ability to make a provisional offset claim. EDQ's advice in the presentation was that there are no restrictions on making offsets claim and it is suggested that this clause be amended to reflect this advice. Amend the clause to clarify that there are no restrictions on making provisional offset claims.	The provisional offset process has only been intended to gain certainty where infrastructure scope or cost have varied from the current ICOP.
22.	DCOP Clause 3.5 - MEDQ will not accept and apply an approved provisional offset claim against development charges which are levied upon a PDA approval. Recommend rewording of the clause.	Acknowledged and has been amended in the DCOP amongst the broad amendments to Section 3.
23.	DCOP Clause 3.6 - The requirement to bond works that are not being offset does not seem to be congruent with the offset. If the offset cannot include the bond amount, then why is a bond necessary, particularly if the works are certified as being complete?	No change. Bonded works are not considered completed works and as such cannot be offset.

#	Summary of Issue	Response
	The need for bonding uncompleted works would only be required where this is related to a development condition and is not relevant to the applying offset accruals for an asset that might be staged. Request removal of this clause.	
24.	DCOP Clause 3.6 - The maximum Infrastructure Offset that may be claimed is equal to or less than Development Charges. This intent is not clear, consider rewording	Acknowledged and has been amended in the DCOP amongst the broad amendments to Section 3.
25.	Link to Maps	No change. Noted, this will be implemented in a variety of formats in the future.
26.	DCOP Clause 3.6 - Suggest rewording include provide refunds in a timely manner.	No change. Refunds will still be provided when EDQ has sufficient charges collected.
27.	DCOP Clause 3.8 - It would be desirable to allow the transfer of final offsets between projects. This would be particularly useful for owners of multiple projects and may reduce the need for refunds. EDQ consider incorporating advice that final offsets can be transferred across projects with EDQ approval.	No change. Not supported as part of standard practice.
28.	That the DCOP clarify that unused offsets (credits) are indexed annually in line with the charges indexation.	Acknowledged and has been amended as part of the addition of Section 4.
29.	Clarification that TMR assets are not funded through the IFF and are to be funded by TMR through the normal TMR/State budgetary process and that developers should not be held responsible or conditioned to provide TMR infrastructure.	No change. The Rail Corridor land within Greater Flagstone is funded by the State Charge.
30.	Clarify that the 2% final offset approval fee is capped at 2% for all approval authorities.	No change. EDQ is the delegated authority and therefore the cap remains.

#	Summary of Issue	Response
31.	Wording to the effect that where actual costs to deliver an item of infrastructure exceeds the DCOP amount then the actual cost will be accepted for a final offset.	Offsets will be provided in the event of a variation of actual costs against the DCOP if a provisional offset has been granted.
32.	Reinstate wording that confirmed acceptance of cross crediting costs with a charges type.	Additional wording regarding cross crediting added to the DCOP.
33.	Sub-regional plans and SOW be included in the DCOP as the DCOP relates to the sub regional charge.	The Sub-regional Water and Sewer strategy have been incorporated into the DCOP mapping. Other mapping may be provided on request.
34.	To maintain the same standard of document and process, this clause needs to be included in the DCOP.	No change. Where there is an approved alternative network layout, this can be updated within the 5-yearly resets and can be catered for as part of a provisional offset.
35.	Include asset ID's for existing assets on the infrastructure maps.	Existing asset ID's added to mapping.
36.	The CAU (Cost Apportionment Methodology) notes that there has been no costs allocation for community uses on the assumption that community uses do not pay infrastructure charges. This is not correct as only State uses are exempt from paying charges as per the DCOP.	No change Community uses may have charges applicable and any future CAU updates for community uses will be reviewed as part of the 5-yearly updates.
37.	The rates for the various 4Lu works appears to the be full road cost rather than the upgrade cost only. However, it is noted that the SOW model rates appear to be correct. Review and updated as required.	No change. This has not been amended due to the significant number of variations in sequencing costs depending on the road sections.
38.	As agreed with the landowners, the draft DCOP only allows for embellishment offsets for the linear park areas and not for revegetation areas. The agreement to remove the offsets for	No change. DCOP does not control revegetation standards. The standards will be set as part of a relevant development approval.

#	Summary of Issue	Response
	revegetation works was made on the basis of EDQ providing a revegetation specification/standard for these works. This is not provided in the IPBR.	
39.	IPBR 6.3.5 - Cut and Fill for Parks - Experience suggests that one metre cut to fill earthworks is insufficient for most sites and two metres cut to fill would be a more relevant allowance.	No change. Incorporation of the additional metre of cut and fill would result in a cost increase of approximately \$54 million.
40.	IPBR 6.3.5 - 12-month maintenance period - It is noted that the offsetable maintenance period is 12 months. However, where approval conditions require longer, this should also be offsetable.	No change. 12 months is what will be offset by EDQ.
41.	IPBR 6.3.5 - It seems odd that the length of offsetable road should be set by the site area rather than the actual length of road frontage provided. The actual offset should be equal to the road length provided and approved in the development approval.	No change. This is what was assumed in the cost buildup, not what is considered the maximum offsetable length.
42.	The length of an offsetable road for a secondary school appears inadequate. Given that a secondary school has an area 70% larger than a primary school, then the length of the access road for a secondary school.	No change. This is what was assumed in the cost buildup, not what is considered the maximum offsetable length.
43.	Generally, the contingency rates are agreed with. However, the contingency rates for roads are considered too low and would not be consistent with State estimating parameters for works which have no design. It is also noted that the contingency for bridges/Culverts in the Ripley Valley PDA is 20% and this same rate should apply at Greater Flagstone. Increase Roads and Bridges to 20%.	No change. An increase in contingency for the transport network of 5% would result in a cost increase of \$22 million with minimal tangible benefit.
44.	The IPBR would be more user friendly if a more comprehensive index could be provided – this	Linked contents page in IPBR and Appendix D has been included.

#	Summary of Issue	Response
	document is 560 pages long. Provide an index for ease of use.	
45.	In several locations in the IPBR the term "creditable" is used. To be consistent with other language and with State language, this should be changed to "offsetable". Credits (in accordance with State language) applies to the value of charges for an existing use. Change Creditable to offsetable.	Acknowledged and amended where relevant.
46.	The IPBR does not provide any information on how the charges is actually calculated and the comparison of the gross charges (net of DCF factors) against the gross value of the infrastructure. Include a section in the IPBR that provides a reconciliation of charges and a reconciliation of the gross charges against the gross infrastructure costs.	No change. The intent of the IPBR is to provide the key assumptions behind the calculation of the charges. Details of the model itself does not fit into the scope of the IPBR.
47.	There are multiple error references throughout the document.	Noted and amended.
48.	7.18 – Technical Report Provide further cost breakdowns.	Noted, this documentation is no longer relevant.
49.	Contingency calculation has changed and is now calculated on the total value of the works contribution and the owners' costs. This is a major change from the funding framework for the last 10 years and EDQ agreed last year to change this back to only calculating contingency on the works cost. Recommend reverting back to contingency calculation to not including owners cost in the contingency.	No change. Standard Industry Practice for cost estimation in a Long-Term Infrastructure Planning setting is to compound in the manner identified within the DCOP.
50.	The SOW Schedule does not reflect Provisional Offsets already approved.	Inclusion of provisional costings will be assessed on a case-by-case basis.
51.	3.8 Entitlement to a refund - Detailed mechanism / clause(s) is requested to be included in the DCOP to provide certainty on the process and timing of obtaining a refund as it is highly likely that some developers will be unproportionally funding trunk	Timing of refund is still dependent on availability of funds.

#	Summary of Issue	Response
	infrastructure to the benefit of others.	
52.		No change.
	Bring forward of infrastructure in various locations.	Reviewed and not adopted due to unknown flow-ons effects within the broader network.
53.	Population thresholds should also align with Logan City Council's	No change.
	DSS for the relevant infrastructure item. Request to be involved in the future identification of timing and population thresholds for delivery.	Timing is based upon either when lead infrastructure is required for certain catchments or when demand thresholds are met in accordance with DSS.
54.	Request the EDQ look to 'flatten' the infrastructure	No change.
	expenditure to a more realistic scenario.	Infrastructure expenditure is based upon assumptions that the developers within the PDA provided direct input to. This will be reassessed at each 5-yearly review.
55.	It is noted that EDQ is proposing to increase infrastructure charges to \$47,078 per lot (including value capture charge). This is a significantly lower increase per lot than originally forecast by EDQ and is supported.	Noted.
56.	Request exploration with EDQ the competitiveness of the	No change.
	industrial land charge and potential incentives, as it is key to unlocking employment opportunities for residents located within the Greater Flagstone PDA and surrounding areas.	The non-residential charge is calculated based upon its equivalent Charges Apportionment Unit (CAU) identified in the IPBR.
57.	The sequence of development assumed in the SGS report has	No change.
	been damaged by time. Request amendment to development sequencing to be in line with current assumptions.	The base date of the DCOP is June 2020. Any changes to development yield or sequencing will be reviewed at each 5-yearly update.
CATE	GORY: STATE COMMUNITY FACILITIES	
58.	It is acknowledged that the current ICOP allows for 1 district police facility (0.6ha) and any additional land/facilities required will not be funded by the DCOP in the Greater Flagstone PDA.	Noted.

#	Summary of Issue	Response
59.	Additional schools and a police station have been added to the Flinders Lakes development. This is in line with the discussions held with the Developer Group to date.	Noted.
60.	It is assumed the locations of this infrastructure are flexible to allow for future detailed planning and design of the developments.	Acknowledged.
61.	The DCOP mapping and cost schedules for the State School and State High School sites are satisfactory and consistent with the latest context plan.	Noted.
62.	To the extent the DCOP contains an additional State School site (PS101) and Police Station (P002), this is not consistent with current ICOP mapping or the endorsed Community Facilities IMP; however, we acknowledge discussions that have been ongoing between EDQ, Department of Education and the developer in relation to provision of an additional State school site.	No change. Noted.
63.	Provision of an additional school site reduces the developable area of the site and the yield, which in turn reduces the available infrastructure charges in which to offset (or fund) provision of infrastructure. the subject development is already subject to a an approximate 'refund position' upon completion of all municipal infrastructure works. Reduction in yield may also impact yield assumptions and have flow-on effects to other infrastructure items, which may no longer be needed (schools included).	No change. Noted, this is to be monitored over time and amendments may occur at the next review where relevant.
64.	Acknowledged the EDQ has communicated its position that State Agencies will need to negotiate with landowners to secure the 'additional' school sites. It remains to be determined how this will work in practice, as the DCOP mapping does not provide a separate legend item for additional school sites, nor does it clearly define how this process will work. It is hoped that when assessing	No change. The DCOP identifies the additional sites through the Legend of "Subject to State Agency Acquisition".

#	Summary of Issue	Response
	context plans for endorsement, EDQ's development assessment team will adopt a flexible approach to 'additional' school sites, which may include nominating these as 'potential future schools' with an underlying residential (or other) zoning. This method would allow flexibility, given that actual yield may differ from assumed yield, which may then alter the need for additional school sites.	
CATE	GORY: TRANSPORT	
65.	Homestead / Teviot intersection no longer shown on intersection mapping – assumed this has been moved to the SRIP/SRIA. Please confirm.	No change. Homestead Teviot Road Intersection has been added to the SRIP.
66.	Several intersections through the PDA are now shown as three phases (previously two). What are the three phases? Does this increase cost? The Flinders Lakes Dr / Kilmoylar Rd intersection has been endorsed and proposed to be constructed in two phases – is this affected?	Acknowledged, refer IPBR Appendix D Table 7.8 listing stages and their inclusions. Intersection is amended in DCOP to reflect two phases.
67.	The BEBO Arch crossing of Flinders Lakes Dr (located just west of the Kilmoylar Rd intersection) should be shown on this mapping due to its cost. Alternatively, please confirm it has been included as part of Road 016A/B cost as has been assumed to date.	EDQ acknowledge the likelihood of this crossing and smaller associated but will assess as a provisional when appropriate to include.
68.	Does RC014A and RC014B relate to the crossing of Teviot Brook? If it does, this is currently a bridge crossing that was recently constructed by Scenic Rim Regional Council, not a culvert crossing as currently shown.	Acknowledged and DCOP now only assumes future bridge duplication.
69.	Why is there no off-road shared path within the southern section of the PDA? Please advise.	No change. The majority of the AT network resides with the road network as shown on the road cross sections. EDQ is looking to expand with reference to the VLC AT report over time.

#	Summary of Issue	Response
70.	The map showing the extent of creditable off-road shared paths was not available when the Flinders IMPs were prepared. It is assumed that the pathways within the natural areas and linear parks referenced within the endorsed Flinders IMP are considered creditable against this charge or the 'Park mapping' allowances.	No change. The pathways will be considered for offset provided they are within the 15m creditable "active linear" component of a linear park identified in the DCOP.
71.	Extent of shared path reduced significantly from current ICOP mapping. Does the road network cost include the separated cycleways and therefore extent of shared paths reduced? As a result of this, has the inclusion of the separated cycleways increased the overall road costs and therefore increased the municipal charge? Please confirm or otherwise.	No change. The majority of the AT network resides with the road network as shown on the road cross sections and as a result have provided a higher rate/m for the transport network. EDQ is looking to expand with reference to the VLC AT report over time.
72.	R047 and RC015 to be realigned.	Updated and amended in the SOW and mapping to reflect latest approvals.
73.	Include Endorsed IMP Roads in the DCOP.	No change. The known endorsed IMP roads were included within the model however many did not meet the trunk criteria within the DCOP.
74.	Road with more than 7,500vpd to be added to DCOP.	The known approved endorsed are included within the model.
75.	Roads R026A&B and R034A&B to designate these roads as 4L only.	Modelling does not stipulate the need for a transit lane and therefore has been removed on this corridor.
76.	R009 - This road is already 4 lanes east of the railway line and costs related to this can be removed from the SOW.	Acknowledged and amended.
77.	The calculation for costs for this item does not appear to be correct and does not match the future column	Updated where relevant
78.	The latest draft DCOP shows a significant decrease in cost allowances for the all the bridges across the railway. The landowners believe that the new cost allowances are insufficient and should be reinstated	No change. The rate increase is from \$5,252/m2 to \$8,000/m2 has not been substantiated. Should it be necessary to update, EDQ will assess as a provisional when appropriate to include.

#	Summary of Issue	Response
	to the ICOP cost allowances.	
79.	EDQ advised that an additional culvert is required on Teviot Road near Wyatt Road near intersection RI015.	No change. EDQ acknowledge the likelihood of this culvert but will assess as a provisional when appropriate to include.
80.	R026A&B and R034A&B - The ratio between interim and ultimate costs are considered incorrect. Interim works involve ultimate earthworks in addition to constructing half the carriageway, therefore are considerably more expensive than ultimate works when viewed as a \$/m2 on the interim or ultimate area.	No change. The earthworks timing requirements for phased 4-lane roads has differed on a case-by-case basis.
81.	RB002B - This ultimate bridge is specified as 4 lanes + 2 bus lanes. Given our understanding that the ultimate trunk roads immediately south of this bridge (R027B and R034B) have been designed as an ultimate 4 lane only road with no separate bus lanes, in addition to our request for the ultimate road immediately north of this bridge (R034B) to be reduced to 4 lane only road with no separate bus lanes – we also request that this ultimate bridge be amended to be an ultimate 4 lane only road with no separate bus lanes.	No change. Modelling does not stipulate the need for a transit lane and therefore has been removed.
82.	RB003 - Cost estimates indicate a construction rate of \$8,000m2.	No change. EDQ agree to the increase in width from 15 to 16m and length from 40 to 60m (2 span) to cater for doubling of the future passenger rail corridor width. The rate increase is from \$5,252/m2 to \$8,000/m2 has not been substantiated.
83.	R040 - It should also be noted that the VLC traffic modelling details a significant connection within Precinct 1 that is no longer forming part of the Riverbend transport network. Due to the previous and current traffic modelling highlighting movements of 9,000vpd along Riverbend Boulevard, and network inconsistencies within the current modelling, we request that the full length of	Acknowledge the volumes exceed the identified threshold and therefore has been included in DCOP as trunk infrastructure.

#	Summary of Issue	Response
	Riverbend Boulevard (R040) be reinstated within the Draft DCOP.	
84.	RI016A is Missing from mapping.	RI016A included within SOW and mapping.
85.	RI017 & RI022 Costs have greatly reduced from what was detailed in the ICOP. Offset allowances have reduced from \$4.8m to \$2.2m and considered insufficient.	No change. Costs have been maintained in accordance with the build up developed alongside the DCOP.
86.	The road network mapped in the VLC Model incorrectly.	No change. EDQ acknowledge that the road alignments are shown differently but not modelled differently.
87.	Figure 8-1 of the DCOP IPBR captures the trunk active transport network, suggesting this should be included as offsetable infrastructure within the DCOP. Figure 8-2 of the DCOP IPBR is incorrect and fails to correctly identify the approval statuses. This error may have influenced the exclusion of the shared paths. Submitter has an approved whole of site context plan and several RoL approvals which are not correctly shown. This should be rectified.	4m Shared Paths will be included within DCOP. Figure 8.1 illustrates the Shared Paths within the linear parks which then transition to shared paths in the road reserve. The base date of the DCOP is June 2020. Any changes to development yield or sequencing since will be included within the next 5 yearly update.
88.	Roads R043 and R044 are incorrectly mapped as Urban Arterial on the DCOP Intersections and Bridges and Culverts DCOP maps. Request to Amend DCOP Intersections and Bridges and Culverts maps to correctly identify roads R043 and R044 as Trunk Connectors in line with approvals.	Acknowledged and amended.
89.	Road R043 is nominated as a "4L (Standard)" cross section in the DCOP SOW. This conflicts the cross section approved under a Movement Network Infrastructure Master Plan (MNIMP) and ROL05 (Precinct 9). Request IPBR to be updated with the R043 non-standard cross section and DCOP SOW to be updated accordingly.	No change. EDQ will respect the approved 28m Trunk Connector notwithstanding the equivalent DCOP standard is 33m.

#	Summary of Issue	Response
90.	The key, high frequency public transport mode is considered to be the rail line extension between Flagstone Central and New Beith stations. Should other corridors be considered for Higher Occupancy Vehicle (HOV) travel lanes or bus lanes, consideration should be given to New Beith Road.	No change. Noted.
91.	Intersections noted are trunk to trunk intersections with no allowance for any signalised trunk to non-trunk roads on the Tarnbrae site. There does appear to be allowance for trunk to non-trunk intersections in other land within the PDA (in particular the PEET land) and we understand this is reflective of endorsed infrastructure plans. The Tarnbrae development has an endorsed Movement IMP which shows future signalised intersections – consideration should be given to including some of these intersections in the network mapping, particularly where these intersections coincide with required State school infrastructure.	No change. The metrics that can be used in assessing the performance of an intersection are discussed within Section 7.4 of Appendix D of the IPBR. EDQ has relied upon the application of these within the VLC modelling to determine which are trunk intersections.
92.	Road widths are not shown in the SOW model although there is a column for it. This is necessary to confirm intended land take area.	Acknowledged and included.
93.	The bridges and culverts structure widths are not shown in the SOW model although there is a column for it. This is necessary to confirm intended deck area.	Acknowledged and included.
CATE	GORY: WATER	
94.	The proposed water supply scheme is significantly inconsistent with the endorsed IMP, previous ICOP/DCOP mapping and is therefore not supported.	No change. Upgrading from ICOP to DCOP provided the opportunity to revisit the prior network planning. Following more thorough priority software modelling, EDQ has collaborated with all stakeholders to arrive at a more beneficial technical and financial solution.

#	Summary of Issue	Response
95.	Similar to sewerage, there is a significant reduction in the extent of water mains and other water infrastructure within Flinders, to the point where WM085, 86 & 87 are not even connected to the rest of the network. We can only assume that this infrastructure is now included in the SRIP/SRIA? To assist in understanding the proposed sewer system, it's suggested that the sub-regional infrastructure is also shown on the DCOP mapping.	Acknowledged. There has been a significant change on the regional water supply strategy since the endorsement of the IMP. The HLZ reservoir and its feeding main has been included in the Subregional Infrastructure network to take into account the servicing of area outside the PDA. The Lower Flagstone Supply Area is now supply directly by the Wyaralong Interconnector through the new proposed Lower Flagstone Reservoir (Subregional). That has optimised the sizing and pressure zones arrangement for the area reducing the amount of municipal infrastructure required. Generally, these changes provide a more favourable servicing strategy for the development of the Lower Flagstone area. The development IMP will need to be updated to reflect the new regional servicing strategy and the updated regional model can be provided by Logan Water to assist with that. The SRIP mapping will be included in the DCOP network maps.
96.	It appears that a new water supply strategy has been adopted for the PDA, with more booster pumps and less reservoirs. It is also noted that water main alignments & sizing (generally smaller) are different to the endorsed Water IMP and previous ICOP/DCOP mapping. Who developed this strategy? LWIA? Has it been modelled? Does this approach reduce the overall water infrastructure cost? Will each development be expected to adopt the DCOP sizes? Will a copy of the new model for the PDA be provided to review? Please advise.	No change. A new regional supply strategy has been adopted by Logan Water and that optimise the serving strategy and required infrastructure within the PDA. The development IMP will need to be updated to reflect the new regional servicing strategy and the updated regional model can be provided by Logan Water to assist with that.
97.	It is assumed that watermains are shown diagrammatically, but it's noted that the watermain along the entry road to Flinders follows existing road reserves, it doesn't follow the likely alignment along the endorsed Flinders Lakes Drive alignment.	No change. All mapping is representative of location for confirmation during design.
98.	WM006/WM007/WM008 required to be realigned in accordance with latest approved layout.	Agreed, WM007 to be realigned along the road and WM008 to follow the service lane.
99.	WRES001. The Works Base Cost of \$1,363,609 is considered inadequate given the Logan Water Infrastructure Alliance 2019 Water Master Planning Report found that this reservoir (PWT9	No change. The location of the proposed reservoir for the New Beith WRES001, currently

#	Summary of Issue	Response
	Round Mountain HLZ_2) is expected to cost \$2,326,222. The location of this reservoir is also not considered to be final as a potential alternative option is available to locate this reservoir further west on land just outside the PDA. It is understood that Logan City Council are yet to undertake an options analysis to determine the final suitable location of this reservoir. Should the options analysis provides the opportunity to locate the reservoir outside of the PDA.	shown on Round Mountain, is currently under detailed planning investigation. Pending the result of the planning investigation, the location of the reservoir may change. Cost for this reservoir will be revised as part of the detailed planning investigations.
100.	The revised DCOP mapping for water supply infrastructure is supported;	Noted.
101.	Appreciate EDQ has altered the timing for Round Mountain reservoir from 2054 to 2041, however the reservoir may be required prior to 2041. More detailed investigations would be required but there would be more than sufficient time between now and the preparation of the next DCOP to refine this timing.	No change. It is expected that the early developments within the HLZ will be serviced through a temporary booster supply zone.
102.	New regional water supply reservoir on Round Mountain is consistent with the endorsed Water/Sewer IMP.	No change. The location of the proposed reservoir for the New Beith WRES001 is shown on Round Mountain, is currently under detailed planning investigation. Pending the result of the planning investigation, the location of the reservoir may change.
CATE	GORY: SEWER	
103.	The proposed sewerage scheme is significantly inconsistent with the endorsed Flinders IMP, previous ICOP/DCOP mapping and is therefore not supported.	Upgrading from ICOP to DCOP provided the opportunity to revisit the prior network planning. Following more thorough priority software modelling, EDQ has collaborated with all stakeholders to arrive at a more beneficial technical and
104.	There is a significant reduction in the extent of sewer mains in the south-west corner of Flinders Lakes, including the removal of the required pump station and associated rising main. Where does GM055 gravitate to? We can only assume that this infrastructure is now included in the SRIP/SRIA? To assist in understanding the proposed sewer system,	financial solution. To better understand, the SRIA maps will be included within the DCOP. Any developers that have acquired rights over future access or infrastructure easements, should only proceed in consultation with EDQ so that the most efficient solution considerate of asset type and alignment is endorsed.

#	Summary of Issue	Response
	it's suggested that the sub-regional infrastructure is also shown on the DCOP mapping. Currently it shows pipes gravitating to nowhere. Please confirm.	
105.	The majority of Flinders Precinct 1 is now sewered via adjacent properties which will impact cost and delivery timeframes as there are no easements in place on the adjacent properties to match the proposed sewer alignment. Pacifiq has already secured downstream easements to suit the endorsed IMP strategy already at significant cost and time. We do not support any deviation.	
106.	Alignments within the eastern section of P1 don't allow for the	No change.
	endorsed lake, where previous ICOP mapping & the endorsed IMP did. These alignments need to be updated.	Alignments are indicative and subject to further detailed planning investigation.
107.	It is noted that pipe sizes within & external to Flinders are smaller	No change.
	than previous ICOP mapping and the Flinders' endorsed Sewer IMP.	Upgrading from ICOP to DCOP provided the opportunity to revisit the prior network planning. Following more thorough priority software modelling, EDQ has collaborated with all stakeholders to arrive at a more beneficial technical and financial solution. Sometimes this has reduced pipe lengths or sizes which in several instances has meant that they are no longer trunk.
108.	Some of the rates in the SOW for the gravity mains are not	No change.
	consistent with the IPBR.	This is due to manholes being incorporated in the cost per metre within the schedule.
109.	RM004 - The calculation for costs for this item does not appear to be correct and does not match the future column.	Noted, reflects calculation costs in update.
110.	A section of 300mm diameter sewer main included in the IMP has	No change.
	been omitted.	The IMP needs to be updated based on the actual location and depth of the FN2 Subregional Pump Station delivered by Council.
111.	GM009, GM010 likely to be required prior to 2031.	No change.

#	Summary of Issue	Response
		Staging is based on the adopted population projections and aligned the timing of the pump station delivered under the SRIP.
112.	The DCOP municipal sewer infrastructure generally aligns with infrastructure plans although there is opportunity to better refine the DCOP plans and cost schedules. Suggest DCOP assets GM004, GM005, GM006, SPS001, RM003, EXRM02 and EXGM02 be deleted and replaced with the following to improve accuracy within the DCOP.	No change. The base date of the DCOP is June 2020. Any delivery since will be included within the next 5-yearly update.
CATE	GORY: PARKS AND OPEN SPACE	
113.	All linear pathways have been removed from the DCOP mapping. Are these still offsetable /creditable?	No change. Linear pathways form a part of the standard 15m active linear corridor and are still part of the trunk network.
114.	It is assumed the locations of this infrastructure are flexible to allow for future detailed planning and design of the developments. Please confirm or otherwise.	No change. Correct, locations are subject to further detailed planning.
115.	Should the endorsed lake within Flinders Lakes be shown on this map? We request that the linear park mapping is removed where the endorsed lake is located.	No change. The endorsed lake is not considered part of the network.
116.	The land value for Open Space is based for >Q20 & <100Q under the IPBR. The subject sites are not impacted by flooding and is above the Q100. Therefore, the use of this land value is not an appropriate method for compensating the landowner, in the event the park is provided on land above Q100.	No change. The constrained land valuation is utilised due to the existing requirement under the development scheme for parks and open space, meaning this land has been constrained upon declaration of the PDA.
117.	request the ability to re-calculate the base costs and land value to appropriately reflect the market costs associate with this delivery of this infrastructure.	No change. The land value is fixed as per the calculations in the IPBR. The base costs are the current best estimates at a point in time, but provisional offsets may be lodged if in accordance with the DCOP requirements.

#	Summary of Issue	Response
118.	This civic park is not located on the subject site on the basis the location further to the north would provide for greater connectivity and utility of the open space network envisaged under the DCOP.	No change. Civic Park is indicative only, the intention is for the Civic Park to be included in the existing Centre.
119.	The currently limited mapping of Local Linear Open Space on our site does not appropriately reflect the natural watercourses and features of the site.	No change. Linear mapping is indicative only and may be reviewed on a case-by-case basis.
120.	POS032 - Add additional map area to major linear park.	No change. Area is remaining as mapped in DCOP.
121.	Consistent with the current ICOP mapping, noted that some developers are required to supply a significant amount of park infrastructure (particularly major sports and recreation park infrastructure) when compared with other developments within Flagstone.	No change. Open Space requirement areas are indicative only and are subject to final approvals in accordance with Guideline 12.
122.	The cost schedule and identified park size generally aligns with the endorsed IMP's and is generally supported. We thank EDQ for their amendments to (generally) align the park sizes specified in the cost schedule with the endorsed IMP; however, we note that if population projections are altered from what was assumed (i.e., upon reconfiguration approval, if yields are not matching assumptions), the IMP will need to be reviewed and potentially amended. This may impact on park sizes and therefore the cost schedule.	No change. Noted. The current maps are as per existing IMPs however applicants are still required to meet their approval condition requirements where necessary.
123.	Request that EDQ consider the following: 1. The provision of a more equitable allocation of regional and district parks across developments in the PDA; 2. The endorsed Greenspace IMP provides a surplus of recreation parks (8.25ha) and overall surplus of park (6.49ha) when	No change. 1. Park locations are to be maintained as per the existing network in the Development Scheme. 2. EDQ is required to take into account the broader network implications of levels

#	Summary of Issue	Response
	considering only the creditable parkland (excision of environmental park etc from this calculation). A district recreation park could be removed from the development and the development would still be providing a surplus of recreation park (and overall park) based on the population projection. We therefore request that EDQ consider deletion of POS002 (District Recreation Park), which would not affect compliance with PDA Guideline 12; and would save infrastructure costs under the DCOP and assist in reducing the 'refund' position for the Tarnbrae development; 3. EDQ should also consider reducing embellishment standards for recreation and sports parks to reduce costs. If developers wish to over-embellish (subject to Council endorsement), this additional cost could be met by the developers without offset.	of service. Current requirements are to be maintained. 3. Embellishment calculations are currently in accordance with Guideline 12.
124.	It is noted that EDQ are considering removing the infrastructure/costs associated with rehabilitation of linear park corridors. Whilst we are supportive of reducing the costs of rehabilitation of corridor parks, any reduction in the DCOP should align with any development conditions subsequently imposed by EDQ as part of development approvals.	Noted.
125.	The DCOP shows linear parks south of the Logan River. This is part of the wastewater treatment plant and should be removed from the DCOP. Also, some linear park mapped in Riverbend that has already been handed over to Council with the Riverbend development. This should probably be removed from the DCOP map and schedule.	Noted.
126.	Massive increase in costs for District Sports and Rec Parks over the	Costings have been further refined and based on the actual embellishment

#	Summary of Issue	Response	
	ICOP. EDQ to review and advise in relation to section 4.9.3 of the submission as to why it has increased so much.	requirements under Guideline 12.	
127.	Submission provided to EDQ on embellishment rates. EDQ to review submission and update rates as per the request. Rates not updated as per submission.	No change. EDQ has applied a compendium of rates provided by various aspects of the community, rates have been reviewed for suitability and added to the compendium where relevant.	
128.	Request the reclassification of POS328 from Minor Linear Park to Major Linear Park to increase the embellishment allowance for residents on each side of the waterway. Updated District Recreation Park Value in line with approved Provisional.	No change. As per previous planning, this is to remain as a Minor Linear Park. Amended POS005 to be in accordance with approved provisional.	
CATE	 GORY: LOCAL COMMUNITY FACILITIES		
130.	Do not support the reduction in the contingency costs with the DCOP.	No further action. The contingencies have been reviewed as a result of the greater level of detail being undertaken in the planning and development of the DCOP.	
131.	Large difference between EDQ and Council's planning in both number of facilities and land area. For example, there are 27 facilities identified in the DCOP, while there are only 18 in Council's Community Infrastructure Strategy. Opportunities to amalgamate land for community facilities, as is being done in the Yarrabilba PDA, and for Council to nominate preferred location/s, is requested.	No further action. Noted. Further discussions with Council will occur and can be reviewed in future 5-yearly updates.	
132.	Request that the Implementation Charge, or other charges, recovered by EDQ be able to be used for facility construction to service the Greater Flagstone PDA community. This approach will lead to more sustainable community benefits.	No further action. Implementation Charge is not to be used to construct buildings.	
CATE	CATEGORY: MAPPING		

#	Summary of Issue	Response
133.	 There is no identification showing the network map as 'Map 8'. EDQ to include title block on maps to enable referencing. EDQ to incorporate "state school - indicative only" into the legend of the DCOP network map and also the within the DCOP provisions. EDQ to incorporate indicative land requirements for state primary schools and state secondary schools into Legend (i.e., 7 ha for state primary schools and 12 ha for state secondary schools). Include comment on network map and DCOP provisions stating, "Timing and land size requirements for state schools remains indicative only and subject to further negotiation between Department of Education, Economic Development Queensland and the proponent." Otherwise include a clause in the DCOP that allows for this provision. 	 Acknowledged The mapping is considered indicatively only and is subject to change. Land requirements identified in Schedule of Works. This is covered in the current wording under Section 3.3.
134.	R027A/B - Asset ID used twice in mapping.	Acknowledged and amended.
135.	RI013 - R017 priority corridor at this junction.	No change. DCOP mapping is high level indicative locations, this will be resolved at the development approval stage.
136.	RI016A ID is missing from map.	Acknowledged and amended.
137.	Riverbend Intersection - 4-way intersection missing (see map).	No change. Current strategic modelling does not indicate signalised intersection required.
138.	Rail Bridge not connected to Sub-regional Network.	No change. Noted. This will be part of ongoing discussions with Council.
139.	Not in accordance with endorsed IMP.	No change. All endorsed IMPs are incorporated into modelling and mapping.
140.	Sewer GM039 - Reinstate excluded lines.	No change.

#	Summary of Issue	Response
		Lines do not meet minimum trunk standards in updated network planning.
141.	Why has revegetation zone been retained?	No change.
		Revegetation zone has been retained for mapping purposes only.
142.	Linear Park south side to be removed from DCOP mapping and SOW.	No change.
		Acknowledged and amended.
143.	Amend mapping to be in accordance with IMPs.	No change.
		Updated network and mapping have given credence to existing IMPs.
144.	Several pieces of infrastructure have been removed from the ICOP/DCOP mapping which we have assumed have been moved into the SRIA/SRIP. Although without the updated SRIA/SRIP mapping to review now, it's not possible to check that all infrastructure has been covered between the two documents.	Acknowledged. Sub-regional Water and Sewer mapping has been added to the Water and Sewer Maps.
145.	The DCOP includes mapping which identifies school sites in different locations to the current PDA Development Scheme. This inconsistency has the potential to create confusion. It is requested that the DCOP include a statement to confirm what mapping has primacy for the purposes of decision making by MEDQ. Similarly, where a decision is made by MEDQ to locate a school site which is inconsistent with the DCOP mapping, it is requested that the DCOP reference the approved location as the location of the community facility (superseding the DCOP map).	No Change. EDQ considers the locations identified within the DCOP to be high level indicative locations, further refinement of sites will be undertaken at development application stages.

5 List of all amendments to the DCOP

Amendment #	Section details	Nature of/reason for amendment	
Gen	General		
1.	Throughout the document	To reflect finalisation and adoption of the DCOP.	
2.	General Charge information	Increase of raw costs in the Balance Municipal Charge as a result of Public Submissions requesting amendments below.	
Sect	Section 2: Development charges		
3.	Section 2.2 – Tables 2	Development Charge Rate updated to 2022/2023 FY	
4.	Section 2.2 – Tables 3	Development Charge Rate updated to 2022/2023 FY	
Section 3: Infrastructure offsets and refunds			
5.	Section 3.1	Item iii. Added to include applying to Infrastructure contributions that exceeds the Development Charge	
6.	Section 3.1	Items i. & ii. Added to include the types of offsets an applicant may lodge a claim for.	
7.	Section 3.2	Section 3.2 – Requesting a provisional trunk infrastructure offset removed and information included in Section 3.4 Provisional offset claim in 1 July DCOP	
8.	Section 3.3	Section 3.2 Works Contribution – cost estimate changed to Section 3.2 in 1 July DCOP	
9.	Section 3.4	Section 3.4 Land Contribution – cost estimate changed to Section 3.3 in 1 July DCOP	
10.	Section 3.5	Section 3.5 Provisional Offset Claim changed to Section 3.4 in 1 July DCOP	
11.	Section 3.6	Section 3.6 Final Offset Claim changed to Section 3.5 in 1 July DCOP	
12.	Section 3.7	Section 3.7 Deciding a final trunk infrastructure offset removed from 1 July DCOP	
13.	Section 3.8	Section 3.8 Using an offset changed to Section 3.6 in 1 July DCOP	

14.	Section 3.9	Section 3.9 Trunk infrastructure refunds changed to Section 3.7 Infrastructure refunds in 1 July DCOP	
15.	Section 3.10	Section 3.10 Entitlement to a refund changed to Section 3.8 Entitlement to an Infrastructure refund in 1 July DCOP	
16.	Section 3.11	Section 3.11 Determining a request for a refund changed to Section 3.8 Determining a request for a Infrastructure refund in 1 July DCOP	
Section 4: Indexation			
17.	Section 4.1	Additional information added to section 4.1 to provide reference to Planning Act 2016 for meaning of 3 yearly PPI and reference to the 3% indexation for Sub-regional and Value Capture charges.	
	Section 5: Trunk infrastructure plans		
18.	Appendix A	Total works cost and Estimated cost updated to 2022/2023 FY cost terms	
19.	Appendix A	SOW – Transport – width of roads and width/board deck area for bridges/culverts are added to SOW	
20.	Appendix A	SOW – Transport – Inclusion of RB009 as 4LU bridge only.	
21.	Appendix A	SOW – Transport – removed additional transit lane from R026A&B and R034A&B	
22.	Appendix A	SOW – Transport – R009 amended to an existing asset	
23.	Appendix A	SOW – Transport – R065 added to SOW and mapping	
24.	Appendix A	SOW – Parks and community facilities – length and width added to SOW	
25.	Appendix A	SOW – Transport – RI016A included within SOW and mapping.	
26.	Appendix A	SOW – Transport – ORP006 and ORP007 included within SOW and mapping.	
27.	Section 4.2 All Maps	Existing asset labels to be added to all maps.	
28.	Section 4.2 Map 3	Removed R027A/B duplication	
29.	Section 4.2 Map 3 & 5	R047 and RC015 have been realigned	
30.	Section 4.2 Map 4 & 5	R042 and R043 amended to reflect 2 lane roads.	
31.	Section 4.2 Map 7	Removal of POS305 south of Logan River.	
32.	Section 4.2 Map 10 &11	Both maps updated with Sub-regional Infrastructure.	
33.	Section 4.2 Map 10	WM006-8 have been realigned	

Contact Us

Contact Economic Development Queensland by:

Email: edq@dsdilgp.qld.gov.au

Phone: (07) 3452 7880

Post: Economic Development Queensland

Department of State Development,

Infrastructure, Local Government and Planning

GPO Box 2202

Brisbane Queensland 4001 Australia

