



4 March 2026

EDQ Development Assessment Team
GPO Box 2202
Brisbane QLD 4001

Attention: Adam Dunn (Director)

Delivery via email: pdadevelopmentassessment@dsdmip.qld.gov.au

Dear Adam,

Response to Outstanding Matters for PDA Development Application for a Development Permit for Reconfiguring a Lot (DEV2025/1676) at 4745–4759 and 4761–4773 Mount Lindesay Highway, North Maclean

On behalf of *Roubaix Properties Pty Ltd* ('The Applicant') please find below a full response to the outstanding matters requested by the Minister for Economic Development Queensland ('MEDQ') on 22 December 2025 for the development application at 4745–4759 and 4761–4773 Mount Lindesay Highway, North Maclean QLD 4280 formally described as Lot 7 and 8 on RP137101 (EDQ Ref: DEV2025/1676).

The outstanding matters response comprises this correspondence and the following accompanying supporting information:

- **Attachment A** – Conceptual Functional Layout Plan SK01 Revision C;
- **Attachment B** – Email correspondence between *Burchills Engineering Solutions* and TMR;
- **Attachment C** – Amended Hydraulic Assessment Report, prepared by *Burchills Engineering Solutions*;
- **Attachment D** – Amended Conceptual Stormwater Management Plan, prepared by *Burchills Engineering Solutions*;
- **Attachment E** – Further Ecological Response Letter, prepared by *28South*;
- **Attachment F** – Further Issues letter for DEV2025/1587 outlining EDQ's request for a 50m buffer to be retained at the rear of the site;
- **Attachment G** – Electrical Design Plans for inclusion into the approval package along with the conceptual civil drawings.

This correspondence should therefore be read in conjunction with the accompanying supporting information. In addition, this response should be read in conjunction with the common material for the development

application, including subsequent responses to information requests and material submitted with the development application at the time of lodgement.

Item 1 – Lawful Access

- a. *Demonstrate how lawful and safe access to the site will be achieved without reliance on direct access to Mt Lindesay Highway.*

Note: DTMR has confirmed that direct access to the Mount Lindesay Highway, whether interim or ultimate, is not supported. The Department has also advised that construction of the service road parallel to the eastern site boundary connecting to the Mount Lindesay Highway is the responsibility of others and not DTMR.

Upon demonstrating item 1(a):

- b. *Submit a RPEQ certified Traffic Impact Assessment (TIA) which is to include:*
- i. *functional layout plan including a detailed design for the future service road consistent with previous Department of transport and Main Roads' (DTMR) advice (ie EDQ Approvals DEV2024/1558 and DEV2018/961 and related approvals);*
 - ii. *appropriate setbacks and clearances from DTMR's planned and protected Mount Lindesay Highway corridor and associated infrastructure, including but not limited to drainage infrastructure.*

EDQ is unable to approve a development application with no legal point of access. The delivery of a service road is reliant on adjoining development to the north and cannot be a condition of the subject development permit. Therefore, this is not a sufficient response to EDQ's requirement.

Response

In response to **Item 1(a)**, The Applicant again confirms that no direct vehicular access to Mount Lindesay Highway is proposed or relied upon for the development as outlined in the earlier Information Request response dated 21 November 2025.

The service road currently provides access to residences, Council waste service trucks, and industrial developments, and has previously been used for access by Council and TMR contractors during infrastructure works. Construction traffic continues to utilise this access and as referenced in the approved Traffic Impact Assessment (BE220566-RP-TIA-08) submitted under DEV2024/1470/4. It is proposed that temporary access for construction activities will utilise this existing arrangement. Permanent access will be provided via the upgraded service road, which will be developed to an industrial collector standard.

It is acknowledged that the delivery of the service road is reliant on adjoining development to the north, and therefore the subdivision cannot be completed (plan sealing etc) until the remainder of the service road is delivered by the other landowners. The Applicant maintains its position that a condition can be lawfully imposed that requires the service road to be constructed to its ultimate standard prior to the development being completed. This is consistent with conditions imposed for approvals to the north, in particular DEV2022/1315 (specifically condition 10) and DEV2024/1558. This approval is reliant upon the service road being constructed up to its boundary, under approval DEV2018/961.

The Mt Lindesay Highway Service Lane is identified as a trunk industrial connector road under the adopted Development Charges and Offset Plan (DCOP) for the Greater Flagstone PDA. EDQ has confirmed that DCOP infrastructure is delivered through development approval conditions and offset/refund mechanisms. This service road is being delivered under this framework across the developments to the north within the PDA, including under DEV2022/1315. Multiple approvals rely on a coordinated approach to infrastructure delivery in the DCOP (involving multiple landowners), including roads, water and sewer. Conditioning the delivery of infrastructure that relies on neighbouring land is commonplace across Queensland.

To assist EDQ, we recommend the following wording to form the basis of a possible condition:

Submit to EDQ IS, approval from the Department of Transport and Main Roads for the Mt Lindesay Highway Service Lane from 39 SP338781 to enable access; or

Where the part of the service road has been constructed by others, submit to EDQ IS, approval from the Department of Transport and Main Roads for the Mt Lindesay Highway service lane from the boundary of 6 RPI37101, connecting into the extent of the service lane and all associated services constructed by others. The service lane is to be designed to allow for the use of heavy vehicles (B-doubles) and is to have an appropriate turn around facility, as shown in the approved plans.

No plan of subdivision can be sealed until the Mt Lindesay Highway Service Lane is constructed (to its ultimate standard) via the adjoining development to the north.

In response to **Item 1(b)(i)**, we note that SK01 Revision C (refer **Attachment A**) provides a conceptual layout of the ultimate alignment of the service road, providing the appropriate level of detail required to accompany this development application. The Traffic Impact Assessment approved under DEV2024/1558 provides the same detail and covers the same interface. Therefore, the information requested in this request will result in an unnecessary duplication of reporting.

In response to **Item 1(b)(ii)**, the accompanying plans submitted with the application provide the required setbacks and corridor clearances in line with prior TMR advice, which is consistent with what has been approved over land to the north, including DEV2024/1558. The approach taken in this application and the approval to the north is appropriate in ensuring planned upgrades are properly accounted for.

Engagement with TMR also occurred to confirm the details in respect of the planned upgrades. The attached correspondence (**Attachment B**) confirms:

- The TP sketch area intends provision of a service road as part of 6-lane upgrade planning;
- The protected land area on the plans reflects that planning;
- Detailed design must demonstrate compatibility with the 6-lane upgrade which is most appropriately conditioned;
- Future works require TMR approval;
- Although funding is not yet allocated to this project, the protected planning anticipates service roads within the corridor.

We also note that if the existing direct access is removed as part of the 6-lane upgrade, TMR will need to provide replacement lawful access to any land affected as part of that upgrade. Access cannot be lawfully extinguished without replacement.

Considering the above, it is noted to EDQ that:

- The service road is embedded within protected planning;
- If the 6-lane upgrade work proceeds and existing access is impacted, lawful replacement access must follow;
- The approval can be suitably conditioned to ensure plan sealing cannot occur until the service road is delivered.

There is no statutory or planning basis upon which the application can be refused given lawful and safe access is demonstrably achievable without reliance on direct access to the Mount Lindesay Highway.

Further, refusal of the proposal would actively compromise the coordinated delivery of the future service road infrastructure. The development facilitates, rather than frustrates, the orderly sequencing of that infrastructure. To withhold approval in these circumstances would be inconsistent with the statutory purpose of the *Economic Development Act 2012*, which is to facilitate economic development within Priority Development Areas.

Accordingly, refusal on the basis suggested would be unreasonable, contrary to the intent of the legislative framework, and unsupported by any identified planning ground.

For the reasons outlined above, item 1 has been addressed in full.

Item 2 – Flooding and Stormwater

a. *Submit a hydraulic report that:*

- i. *removes the development footprint from within the high flood risk area as identified within Logan City Council's flood mapping;*
- ii. *demonstrates no adverse afflux issues to upstream, downstream or adjacent properties;*
- iii. *demonstrates how flood plain storage will be maintained;*
- iv. *demonstrates that the development will not directly, indirectly or cumulatively increase the risk of the flood hazard to other properties;*
- v. *demonstrates compensation for loss of flood storage given that filling is proposed below the Defined Flood Event (DFE) level;*
- vi. *provides evidence of no worsening on adjoining State Controlled Road.*

Note: The Logan Planning Scheme 2015 which was in effect at the time the operational works application was lodged being version 9.1 (with TLPI No.1/2023) includes an administrative definition for the Defined Flood Event (DFE) being "the one percent annual exceedance probability (AEP) at 2100 flood event)." As such, it is expected that any hydraulic assessment for the site considers a DFE in line with this definition.

b. *Submit an amended stormwater report that:*

- i. *provides a consolidated stormwater treatment strategy (quality and quantity) for the fully developed site to avoid treatment on a lot-by-lot basis; and*
- ii. *demonstrates that the proposed exterior swale has sufficient capacity for the proposed eastern drainage outlet including any additional external catchments and does not result in any adverse impacts to the State Road Corridor.*

The response to Item 2(a) has been provided, however it is noted that the modelling provided has not taken into consideration the significant layout changes required in accordance with EDQ's Information Request. No response to Item 2(b) was provided.

Response

Please refer to the updated technical reports prepared by Burchills Engineering Solutions (**Attachment C and D**), which suitably address all matters raised in Item 2 of the Outstanding Matters Letter.

Flooding

At the outset, we wish to emphasise the following points to EDQ in respect of flooding:

- The Greater Flagstone Development Scheme requires that development ensures protection from flooding, occurs in areas with appropriate flood immunity, and results in no net worsening of flood conditions at site boundaries. Flood constraints are mapped on Map 7 (Q100 flood). The subject land is not identified within the mapped Q100 flood constraint. Accordingly, the required flood assessment under the Development Scheme is performance-based.
- EDQ has relied on relevant State interests indicated under the State Planning Policy – Natural Hazards. Flood may properly be characterised as a relevant State environmental or community interest. However, a State interest is a consideration under s 87; it is not a freestanding statutory assessment code and does not automatically substitute the Development Scheme benchmark. At most, state interests informs interpretation of 'appropriate flood immunity.'
- Whilst the Applicant maintains the view that the TLPI and its defined 1%AEP 2100 DFE does not form a binding benchmark under the Economic Development Act 2012 (Act), the proposal has been assessed against and fulfils the required performance outcomes of all flooding considerations, including the current adopted DEF conditions under the Development Scheme, the TLPI-defined 2100 scenario, along with the SPP considerations.
- Cumulative modelling demonstrates no adverse hydraulic impacts. The proposal does not include compensatory storage below the DFE because the Development Scheme requires no net worsening (adverse impact), not volumetric storage replacement.
- Discretion is afforded to EDQ in assessing proposals for development in the Greater Flagstone PDA, balancing a number of considerations including potential constraints. This approach aligns with the purpose of the Act, of which its primary aim is to facilitate **economic development** (our emphasis).

A formal Operational Work component is not required to be included in this application for the associated civil and clearing works to be assessed. The Applicant will accept reasonable conditions to be imposed on

the approval that require subsequent Operational Work permits (or compliance assessments) to be obtained in relation to these aspects.

As noted above, the revised hydraulic assessment includes an assessment against the 1% AEP 2100 climate change event. As shown in the assessment, the revised development footprint does not fall within a High Flood Risk Area under this event.

The modelling confirms:

- No material increase in the flood extent external to the site;
- Minor, non-adverse afflux impacts, contained within constrained areas of the PDA;
- Low flood hazard;
- Maintenance of floodplain conveyance; and
- No material worsening to the State-controlled road carriageway.

The site is classified within a Moderate Flood Risk Area under the Logan City Council Flood Temporary Local Planning Instrument. This category does not impose a mandatory requirement for flood storage balancing. The planning intent is to avoid material worsening of flood behaviour and increased risk to surrounding properties. The modelling demonstrates that this requirement is met. Compensatory flood storage is therefore not required.

The updated Hydraulic Impact Assessment has been prepared against the revised subdivision layout and incorporates the final development footprint, finished surface levels and earthworks extent. This material forms part of the assessment of the Reconfiguring a Lot application.

To reiterate, the modelling reflects the actual configuration proposed for approval and demonstrates:

- Appropriate flood immunity;
- No adverse afflux or cumulative impacts;
- No worsening to adjoining land or the State-controlled road corridor; and
- A consolidated stormwater management framework for the fully developed site (discussed in further detail below).

Flood risk has been conservatively addressed under both the current day and 2100 climate scenarios.

Stormwater

The updated Concept Stormwater Management Plan (**Attachment D**) provides a consolidated stormwater management framework for the site, including:

- Precinct-scale treatment within the internal road reserve;
- Defined lawful discharge points;
- On-site detention demonstrating non-worsening peak discharge; and
- No direct discharge to Mount Lindesay Highway (State-road corridor).

The subdivision approval establishes the drainage framework. Building-level treatment is proposed to be addressed at MCU/Operational Works stage, which provides an appropriate response to stormwater management whilst balancing the need to efficiently develop the land. This approach is commonplace across Queensland.

In terms of the swale design, the flows discharging from the site will be conveyed via the swales to the site's lawful point of discharge (to the northern lot boundary at the rear of the site) where it is captured in the downstream floodplain. The reporting has confirmed that it has sufficient capacity to ensure external catchments are appropriately incorporated to ensure that there is no impact to the State-road corridor.

For the reasons outlined above, item 2 has been addressed in full.

Item 3 – Biodiversity Values

EDQ requires the protection of all vegetation within 120m of the western boundary, which will include all the Category B – Regulated Endangered vegetation. Submit amended plans demonstrating the above.

Note: No stormwater treatment is to be located within the vegetation corridor.

EDQ's responsibility under the Economic Development Act is to consider all relevant State Interests that apply to a site when assessing a development application. The North Maclean Context Plan provides a high-level, indicative spatial framework that illustrates the intended arrangement of key elements within the precinct, including indicative environmental corridors.

As an indicative plan, it does not resolve vegetation boundaries to a site-specific level nor Page 3 of 3 Economic Development Queensland replace more detailed environmental assessments undertaken at the development application stage.

While the indicative environmental corridor shown on the Context plan does not directly overlap the mapped vegetation on the subject site, this does not diminish EDQ's obligation to consider regulated vegetation and MSES identified in current State mapping. Therefore, realignment of the subdivision boundary is required to reflect the required buffer and vegetation retention requirements for the subject site. If the MEDQ is satisfied that the information you provided complies with the information request, MEDQ will give you a notice of that compliance.

Response

Please refer to the further response letter prepared by 28South dated 19 January 2026.

The letter provides a further overview of the various vegetation protections and considerations for the site, as relevant to EDQ's assessment. Of note:

- The development proposes a balanced ecological outcome, through the retention of a 50m buffer at the rear of the site, as well as the delivery of offsets in accordance with the EPBC Act Offsets Policy;
- The 50m buffer aligns with the approved buffer to the north of the site (DEV2024/1558);
- The retained 50m buffer protects viable conservation-significant and MSES vegetation, aligns with prior EDQ direction (provided in IR responses for the associated OW application DEV2025/1587 dated 25

February 2025 – refer to **Attachment F**), avoids non-functional land sterilisation and supports the orderly development intent of the PDA.

- The requested 120m buffer does not provide any strategic or functional ecological outcome for the site or the broader biodiversity network in the PDA.

In addition, it is confirmed that no stormwater infrastructure (bio-retention or detention) is proposed within the 50m vegetation buffer. Appropriate conditions can be imposed that ensures that any building level treatment devices will need to be wholly located within the lot it serves, and outside the 50m vegetation buffer.

As noted above for item 2, discretion is afforded to EDQ in assessing proposals for development in the Greater Flagstone PDA, balancing a number of considerations including potential constraints. The proposed 50m buffer provides an outcome in alignment with the purpose of the Act, of which its primary aim is to facilitate economic development.

For the reasons outlined above, item 3 has been addressed in full.

Conclusion

We trust the response adequately addresses EDQ's outstanding matters. The relevant information has been provided to EDQ in response to items identified as outstanding and allow for a favourable decision to be made.

Based on the information contained in this response, it has been demonstrated that all matters have been suitably addressed and EDQ can progress to finalising its decision to approve the development.

Appropriate conditions can be imposed on an approval, requiring:

- Compliance with the approved hydraulic and stormwater framework as provided in the relevant reporting;
- Submission of Operational Works applications / compliance assessments;
- Construction of works generally in accordance with the approved concept plans;
- RPEQ certification that constructed works achieve the modelled outcomes; and
- No clearing or works outside the approved development footprint and retained buffer areas.

Please don't hesitate to contact **Jorja Feldt (Senior Consultant)** or the undersigned on (07) 3007 3800.

Kind regards,



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