



BLIGH TANNER

Rocky Creek Stage 5 – Response to Notice of Intent to
Refuse

Kroymans Developments Pty Ltd

Date: 21 August 2025

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1. INTRODUCTION

Bligh Tanner (BT) have been requested by Kroymans Developments to investigate and respond to Cairns Regional Council's (CRC's) Notice of Intention to Refuse Rocky Creek Stage 5A & 5B. This Technical Report seeks to understand CRC's position and to determine if Rocky Creek Stage 5A & 5B can proceed while accommodating CRC's stated objections.

This technical report will deal specifically with addressing council's objections as it pertains to the items listed within the Notice of Intention to Refuse.

A summary of the items within the Intention to Refuse is located in Appendix A1, and Bligh Tanner's responses has been provided in Appendix A2.

1.1 Background

On the 29 July 2024 Aspire Queensland on behalf of Kroyman Developments Pty Ltd submitted the following Development Applications:

- + 8/13/2612 – Development Permit for Reconfiguring a Lot (1 Lot into 15 Lots, Park and Balance Lot – Rocky Creek Stage 5A)
- + 8/13/2613 – Development Permit for Reconfiguring a Lot (1 Lot into 22 Lots and Balance Lot – Rocky Creek Stage 5B)

Within these Development Applications was the Pinecrest Water and Sewerage Master Plan - Rocky Creek Stage 5A & 5B report by Stantec, October 2024.

This document analysed CRC's Water and Sewerage Networks to assess the impact Rocky Creek Stage 5A & 5B would have on the network.

On the 17 January 2024 Stantec received the following Notices of Intention to Refuse:

- + 8/13/2612 (#7586679) – Notice of Intention to Refuse - Development Permit for Reconfiguring a Lot (1 Lot into 15 Lots, Park and Balance Lot – Rocky Creek Stage 5A)
- + 8/13/2613 (#7586722) – Notice of Intention to Refuse - Development Permit for Reconfiguring a Lot (1 Lot into 22 Lots and Balance Lot – Rocky Creek Stage 5B)

Through a meeting on 23 January 2025 where Aspire QLD & Stantec sought further clarification with CRC it is understood that the Water Analysis was rejected based upon the 2024 Pinecrest Water & Sewerage Master Plan – Stage 5A & 5B demonstrating non-compliant (< 22 m residual pressures) external to the site as a consequence of subject development and only demonstrating capacity in the downstream sewerage network at the detriment of future planned growth within the PIA.

2. ASSESSMENTS

2.1 Water Assessment

The loadings for the water assessment in the 2024 Pinecrest Water & Sewerage Master Plan – Stage 5A & 5B report are detailed in Section 3.5.4 and include 384 EP for Pinecrest Stage 2 development. The results are detailed in Appendix A Figure A.2 of the report (a relevant excerpt is provided in Figure 1 below).

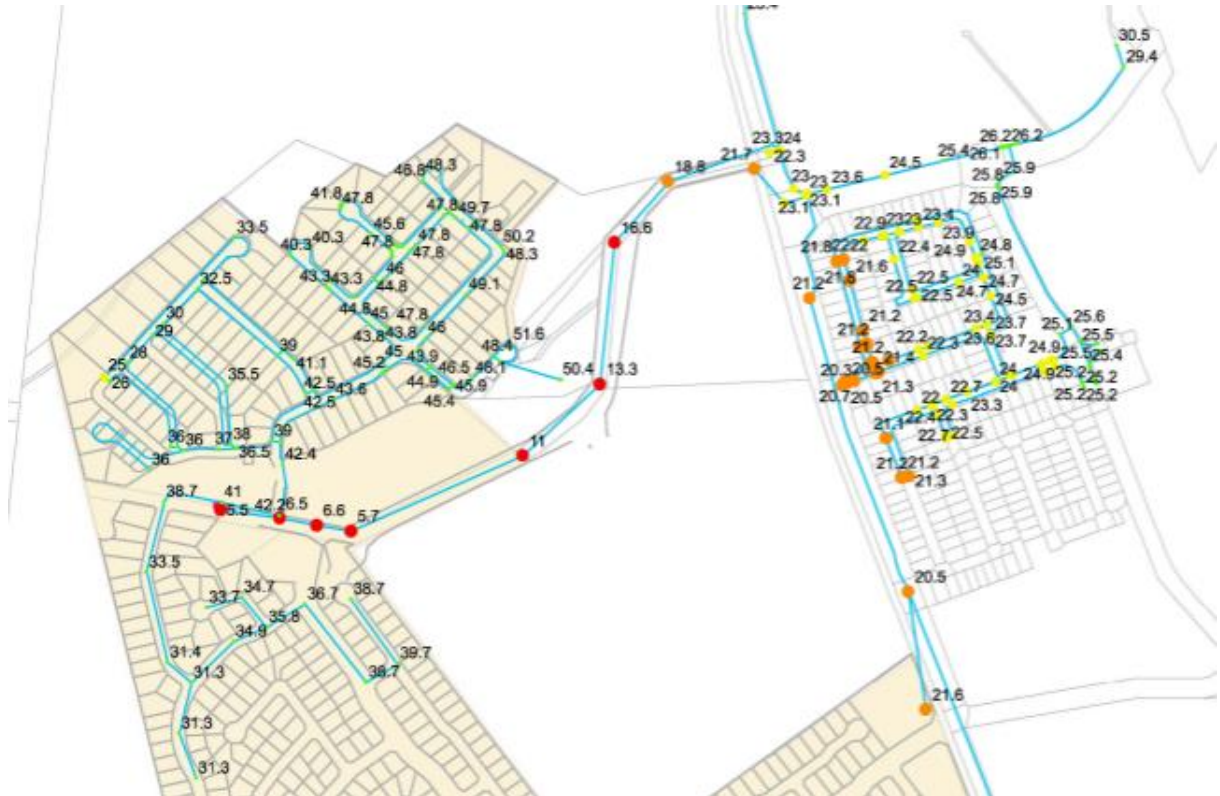


Figure 1 - Excerpt from Figure A.2 of 2024 Pinecrest Water & Sewerage Master plan - Stage 5A & 5B

As can be seen in Figure 1 there are components of the Mt Peter's Estate with pressures that fall below the required FNQROC design standards of 22 m residual pressure because of this development.

By keeping the same demand scenario as Section 3.5.4 in the 2024 Pinecrest Water & Sewerage Master Plan – Stage 5A & 5B report and removing the Pinecrest Stage 2 loads of 384 EP which are beyond the scope of the study, the minimum pressures in the neighbouring Mt Peter's estate become compliant above 22 m (see below Figure 2).

Note, there are residual pressures < 22 m along the Pinecrest booster pump suction line. However there are no residential properties connected on this line and therefore this line is not required to meet FNQROC design standards.

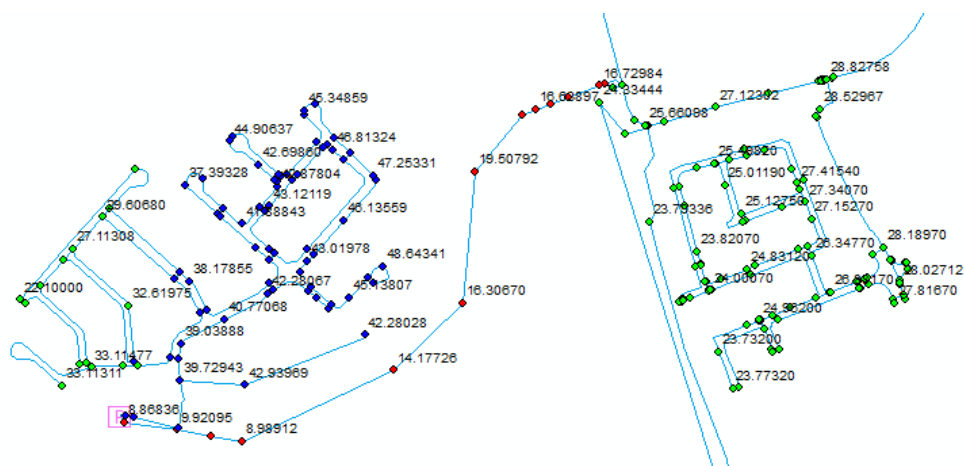


Figure 2 - Rocky Creek Water Model Analysis excluding Pinecrest Stage 2

As all other scenarios were compliant with FNQROC standards, and through our understanding of communications had with CRC, there are no other issues with the Water Analysis. Figure 2 indicates the extent of the water analysis undertaken as part of this technical report.

It is therefore shown as per the 2024 *Pinecrest Water & Sewerage Master Plan – Stage 5A & 5B* report Section 3.5.4 loadings, with the exclusion of 384 EP for Pinecrest Stage 2 loads, that Rocky Creek Stage 5A & 5B will not result in any non-compliant (< 22 m) residual pressures for residential users.

2.2 Sewerage Assessment

The downstream trunk sewer from Pinecrest is close to capacity and was identified in the Edmonton, Mount Peter and Gordonvale Sewerage Planning Study Final Report by Cardno now Stantec in April 2017, as requiring an augmentation by the 2026 planning horizon, however in the Cairns Plan 2016 LGIP this infrastructure was planned for the 2031 planning horizon.

Thus, now to ensure there is enough capacity in the downstream sewer, growth assumptions made in the 2017 Edmonton, Mount Peter and Gordonvale Sewerage Planning Study Final Report are required to be cross verified with actual growth seen.

As such, in the 2024 *Pinecrest Water & Sewerage Master Plan – Stage 5A & 5B* report, Section 3.4 details a desktop assessment undertaken which compares loads in the model with aerial imagery and removing some loads that were not congruent. This was summarised in Table 3-5 of the report the excerpt provided below in Table 1.

Table 1 - Excerpt from Section 3.4 Pinecrest Water & Sewerage Master Plan - Stage 5A & 5B

Table 3-5 Interim Planning Horizon EP Adjustment

Lot Number (As Per Model)	Lot Number (As Per Current Cadastral)	Original Modelled EP	Revised EP	Note
3SP126545	3SP126545	11.54	3.7	Understood to currently be a single dwelling with sheds (See Appendix C).
2SP211755	2SP318396	111.16	7.4	Appears to be one (1) or two (2) dwellings based on QLD Global (See Appendix C).
901SP167091	901SP167091	30.84	7.4	Appears to be two (2) dwellings (See Appendix C).
10RP704143	10RP704143	16.85	3.7	Appears to be a vacant allotment. Apply one connection. (See Appendix C).
	Total	170.39	22.2	

CRC has since communicated that removing loads from 2SP211755, 901SP167091 & 10RP704143 is not permitted as these lots are within the PIA and have growth reservation rights that need to be maintained. Prior established convention within Pinecrest Stage 1 application (Rocky Creek Stages) shows that if unrealised growth outside of the PIA was found it would be acceptable to remove this growth.

In addition to the above, Section 5.4.3 of the 2024 *Pinecrest Water & Sewerage Master Plan – Stage 5A & 5B* report, stated that an additional 70 EP could be loaded onto the system beyond what was assumed in that report.

Through analysis of the sewerage model and the loads outside of the PIA, three properties were found with loads that did not represent growth seen (refer to Table 2).

Table 2 - Revised Loads outside of PIA

Lot Number (As per Model)	Original Modelled EP	Revised EP	Note
236NR6567	18.8	0	Pony Club – Not connected to the CRC Sewerage Network
3SP134760	67.4	0	Old Poultry Farm – Not connected to the CRC Sewerage network
3SP126545	11.5	3.7	One single family lot – to be connected through Pinecrest Included in 2024 report (Table 1)
Total	97.7	3.7	

Through the above analysis it can be seen in Table 1 there was a difference of 148.19 EP, with an additional 70 EP capacity in the downstream trunk sewer. Thus, 78.19 EP of unrealised growth located outside of the PIA was required to be found. In Table 2, 94 EP of unrealised growth located outside of the PIA is found.

These loads were inputted into the sewerage model and the downstream trunk sewer was found to be within the CRC acceptable limits (> 1 m of freeboard). Figure 3 below shows the long section where the depth at the critical maintenance hole is 1.845 m allowing 1.007 m freeboard.

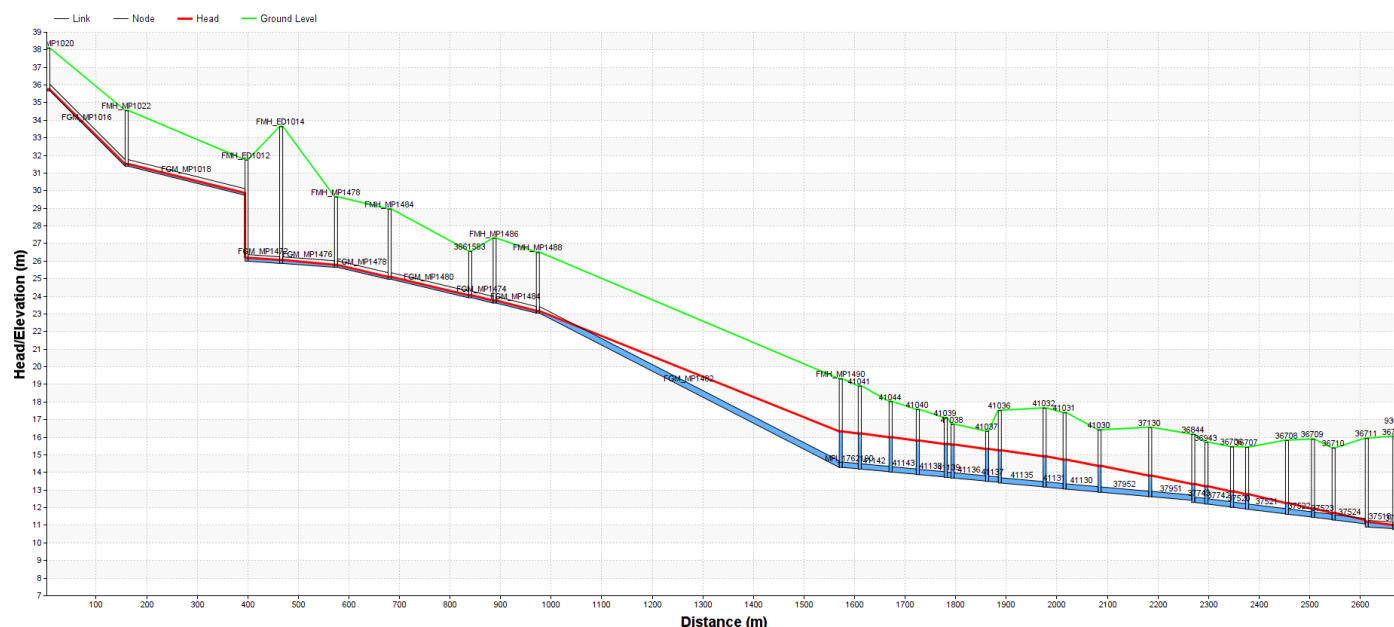


Figure 3 - Long section of downstream sewer with Table 2 loads

3. ASSESSMENT CONCLUSIONS

The assessment of Rocky Creek Stages 5A and 5B has focused on the two key infrastructure elements forming the basis of Council's refusal: water supply capacity and sewerage network capacity. Both aspects have been re-examined in detail against CRC's adopted standards, the FNQROC Design Guidelines, and the sequencing intent of the LGIP. The following subsections summarise the technical findings, demonstrating that with appropriate demand assumptions the development can be serviced without adverse impacts on external networks or prejudice to PIA entitlements.

3.1 Water

The water network analysis undertaken for Rocky Creek Stage 5A and 5B has been reviewed in detail against CRC and FNQROC design criteria. The original 2024 Pinecrest Water and Sewerage Master Plan included Pinecrest Stage 2 loads (384 EP) in the modelling scenario. This resulted in predicted residual pressures of less than 22 m in isolated parts of the Mount Peter Estate. These results were relied upon by CRC as evidence of non-compliance.

However, Stage 2 of Pinecrest south of Conner Road does not form part of this application and should not be included in the assessment of Rocky Creek Stage 5A and 5B. When this demand is removed and Stages 5A and 5B added, all residential connections within the affected area achieve residual pressures at or above the 22 m minimum standard. The only location where pressures remain below this threshold is the suction line of the Pinecrest booster pump. This asset does not supply connected properties and is therefore not subject to the FNQROC residual pressure requirement.

Accordingly, with the correct application of demand assumptions, the development is demonstrated to maintain compliance with FNQROC residual pressure standards, does not create adverse external impacts, and can be serviced without augmentation to the trunk water network in advance of the LGIP timing.

3.2 Sewerage

The downstream trunk sewer from Pinecrest has previously been identified as approaching capacity, with augmentation planned in the CairnsPlan LGIP for the 2031 horizon. CRC's concern related to the approach taken in the 2024 Master Plan, where demand reductions were applied to lots within the PIA. This approach was not supported, as these lots hold growth entitlements which must be preserved.

A revised assessment has since been completed. This maintains full reservation of demand within the PIA, and instead identifies unrealised growth located outside the PIA which can be removed. Specifically, 94 EP was removed from three properties (Pony Club, Old Poultry Farm, and one single family lot). This adjustment was confirmed through aerial imagery and on-ground knowledge, showing that the assumed connections do not exist. When these revised loads are adopted, the downstream sewer maintains greater than 1 m freeboard at the critical maintenance hole, fully consistent with CRC network performance standards.

This demonstrates that the proposed development can be accommodated within the existing sewerage system without premature augmentation, while respecting PIA entitlements and maintaining logical sequencing of infrastructure.

4. COUNCIL'S OBJECTION ITEMS

4.1 Summary

The outcome of the itemised responses listed in Appendix A1 demonstrates that the basis of Council's rejection rests largely on matters already dealt with under the Initial Approval and Structure Plan. Many of the objections repeat high-level planning provisions from the Strategic Framework, Mount Peter Local Plan Code, and Infrastructure Works Code, as well as State Planning Policy references. These provisions are not directly relevant to the assessment of Stages 5A and 5B, as they were comprehensively considered in establishing the Preliminary Approval.

Compliance with the Initial Approval conditions, particularly those requiring updated water and sewer master planning, staging assessments, and network capacity verification, provides a de facto satisfaction of these broader strategic provisions and State interests. Accordingly, their inclusion in the refusal notice does not present new or unresolved issues but rather overstates matters already addressed.

The more substantive issues raised relate to infrastructure servicing, sequencing, and capacity within Council's water and sewerage networks. These have been directly addressed through the Pinecrest Water and Sewerage Master Plan and the additional technical analysis presented in this report. For water, once unrelated Pinecrest Stage 2 demand is excluded, residual pressures across the Mount Peter Estate remain compliant with FNQROC standards, confirming no adverse impact. For sewerage, the analysis preserves all growth allocations within the PIA and achieves capacity by correcting unrealised loads located outside the PIA, thereby ensuring that PIA entitlements are maintained. The downstream trunk sewer is demonstrated to operate within acceptable thresholds, with over 1 m of freeboard at the critical location, confirming compliance with Council's network standards. Importantly, no new trunk infrastructure is required to service Stages 5A and 5B, and the development does not bring forward LGIP augmentations outside their planned horizon.

In summary, the application demonstrates that Stages 5A and 5B can be serviced in a logical, efficient, and coordinated manner consistent with both the Initial Approval framework and Council's adopted infrastructure planning. The grounds for refusal do not withstand scrutiny, as they rely either on conditions already met or on matters not directly relevant to the scope of this application. This report therefore provides a clear and comprehensive basis to confirm compliance and support approval of the proposed development.

A1. SUMMARY ITEMS ADDRESSED – NOTICE OF REJECTION

Number	Letter	Roman	Text	
1			There is an associated Preliminary Approval (Council Ref: 8/13/2318) in effect for the premises and directly associated with the proposed development. The development application has not demonstrated that it complies with all relevant conditions of the Preliminary Approval, including:	(refer child items)
1	a		Condition 2 (Generally in Accordance)	The application satisfies Condition 2 as the servicing strategy has been prepared and assessed in accordance with the Preliminary Approval framework. Water modelling demonstrates compliant residual pressures, and sewer analysis preserves all PIA growth entitlements while adjusting only unrealised external loads, ensuring orderly, efficient infrastructure delivery consistent with Condition 2.
1	b		Condition 3 (Timing of Effect)	Council's Notice of Intention to Refuse relies on Condition 3 of Preliminary Approval 8/13/2318, which requires that subsequent applications demonstrate consistency with the preliminary approval framework, including adequate arrangements for essential infrastructure. The rejection asserts that the Rocky Creek Stage 5A and 5B applications fail this test because they are outside the Priority Infrastructure Area, rely on reducing demand from unrelated lots, and would exceed available water and sewer capacity in the existing local networks. On this basis, Council maintains that the applications have not demonstrated compliance with the servicing outcomes intended under the preliminary approval. In response, it is argued that the applications do in fact satisfy Condition 3. The Pinecrest Water and Sewerage Master Plan and subsequent technical review assessed the development against Council's adopted planning models and FNQROC standards. For water supply, the modelling initially showed residual pressures falling below 22 m; however, this was only due to the inclusion of Pinecrest Stage 2, which sits outside the current scope. Once excluded, pressures are compliant, ensuring that the development can be serviced without compromising existing residents. For sewerage, the updated analysis reserved all PIA growth allocations as required, while correcting external loads outside the PIA that were not connected or realised. This adjustment demonstrated the downstream trunk sewer retains more than 1 m freeboard, consistent with CRC planning standards. Accordingly, the applications demonstrate that Rocky Creek Stage 5A and 5B can be serviced logically and efficiently within the preliminary approval framework, without adverse impacts on PIA growth capacity or premature trunk augmentations. The technical evidence therefore shows compliance with Condition 3, contrary to the basis of Council's refusal.
1	c		Condition 6 (Effect of Structure Plan)	Council's refusal reasons also reference Condition 6 of Preliminary Approval 8/13/2318. This condition establishes the relationship between the Preliminary Approval, its Structure Plan, and the Cairns Planning Scheme. Specifically, it provides that where there is any inconsistency, the Preliminary Approval and Structure Plan prevail; however, where the Preliminary Approval is silent, the provisions of the Cairns Planning Scheme continue to apply. On this basis, refusal under Condition 6 can only be justified if the proposed development conflicts directly with the Structure Plan or Preliminary Approval provisions. The applications for Rocky Creek Stages 5A and 5B are demonstrably consistent with the Structure Plan, which contemplates and supports development in this location subject to appropriate servicing outcomes. Technical evidence prepared through the Pinecrest Water and Sewerage Master Plan and supplementary analyses demonstrates that these servicing outcomes are met without premature augmentation of trunk infrastructure and without adverse impacts on PIA capacity. Accordingly, the applications operate within the framework anticipated by the Preliminary Approval, and by extension comply with the intent of Condition 6. The Structure Plan takes precedence, and there is no demonstrated conflict. Compliance with the Cairns Planning Scheme is maintained in all respects not expressly varied by the Preliminary Approval.
1	d		Condition 8 (Future Development Applications)	Not relevant to report
1	e		Condition 10 (Water Supply and Sewerage Master Plan)	Refer to table for Condition 10 'Initial Approval'
1	f		Condition 11 (Water Supply and Sewerage Infrastructure Plan)	Refer to table for Condition 11 'Initial Approval'
1	g		Condition 12 (Traffic Impact Assessment)	Not relevant to report
1	h		Condition 15 (Noise Attenuation Treatment for Sub-Arterial Frontage)	Not relevant to report
1	i		Condition 17 (Electricity and Telecommunications)	Not relevant to report
1	j		Condition 18 (Drainage Study)	Not relevant to report
1	k		Condition 19 (Footpath Master Plan)	Not relevant to report
1	l		Condition 22 (Vegetation Clearing Plan)	Not relevant to report
1	m		Condition 25 (Rehabilitation of Waterway Corridors)	Not relevant to report
2			The proposed development does not demonstrate consistency with the Pinecrest Master Planned Community (PMPC) Structure Plan because:	(refer child items)
2	a		The proposed development fails to demonstrate integration with:	(refer child items)
2	a	i	Part 3 - Objectives; Integrated and Sustainable Infrastructure, as the development has not demonstrated that the development can be supported by the provision of necessary infrastructure and has not been planned and provided in an orderly, efficient, coordinated and integrated approach	Stage 2 of the structure plan approved under the initial approval 8/13/2318 included the proposed 5a 5b area along Conner Rd. Given the conclusion of Stage 1 there is a natural progression to stage 2 area. The applications are consistent with the Pinecrest Water and Sewerage Master Plan which demonstrates that the development can be serviced in an orderly and efficient manner. Updated modelling as per this technical report confirms compliance with FNQROC standards for water and adequate downstream sewer capacity without premature trunk upgrades, ensuring integration with CRC's network planning objectives.

2	a	ii	Part 4 - Land Uses; Medium Density Residential Precinct, as the development does not promote medium density dwellings in varying configurations, does not promote a mixed residential density character and amenity, is not supported by infrastructure that is planned and provided in an orderly, efficient, coordinated and integrated approach, and does not include lots of a sufficient size to accommodate the intended form of development for the Medium Density Residential Precinct	Not relevant to report
2	a	iii	Part 5 - Staging, as the development does not align with the sequential and coordinated delivery of infrastructure in Mount Peter	Stage 2 of the structure plan approved under the initial approval 8/13/2318 included the proposed 5a 5b area along Conner Rd. Given the conclusion of Stage 1 there is a natural progression to stage 2 area. The proposed development aligns with Part 5 Staging, as it demonstrates that Stages 5A and 5B can be serviced without bringing forward premature trunk infrastructure. The Pinecrest Water and Sewerage Master Plan and subsequent modelling within this report confirms adequate network capacity within existing planning horizons, ensuring coordinated and sequential delivery consistent with Mount Peter's staging intent.
2	a	iv	Part 6 - Infrastructure; Infrastructure Master Plans, as the application has not demonstrated that the development can be supported by the efficient and orderly provision of infrastructure over the PMPC area	The Pinecrest Water and Sewerage Master Plan provides a comprehensive framework for infrastructure across the PMPC, confirming that Stages 5A and 5B can be serviced within existing planning horizons without premature upgrades. Importantly, the Initial Approval and Approved Structure Plan did not impose a specific timeline or link to CRC's delivery of external water and sewer infrastructure. Instead, Condition 11(c) establishes a reporting mechanism to monitor delivery, which the current application continues to address. Accordingly, the proposal supports the efficient and orderly provision of infrastructure consistent with Part 6 – Infrastructure.
3			The proposed development does not comply with, or it has not been demonstrated that the proposed development can comply with (even with the imposition of lawful conditions):	(refer child items)
3	a		State Planning Policy: State interest - liveable communities (2)(d) and (e); State interest - development and construction (1)(d) and (2); State interest - infrastructure integration (1), (2)(a) - (d), (3)(b), and (4); and State interest - transport infrastructure (2) and (3)	Council's notice of rejection lists items from the State Planning Policy (SPP). It is noted that State interests were comprehensively assessed and resolved through the Initial Approval process, which established the Preliminary Approval and Structure Plan. Satisfaction of the conditions of that approval necessarily equates to satisfaction of the relevant State interests, as the Preliminary Approval has already been through State agency referral and assessment. Accordingly, the repetition of SPP matters at this stage does not add any new or independent grounds for refusal. To the extent that they are raised, compliance is demonstrated indirectly through adherence to the Initial Approval. It is considered that the inclusion of these items in the rejection notice overstates their relevance and simply restates matters already addressed in the original approval process.
3	b		Strategic Framework: Part 3.3, strategic outcomes 3.3.1(1)(j), 3.3.1(3), 3.3.1(5), and specific outcomes 3.3.5.1(7)(e); and Part 3.6 strategic outcome 3.6.1(2) and specific outcome 3.6.4.1(3)	The Strategic Framework provisions cited were already addressed in detail during assessment of the Initial Approval, which established the Structure Plan and servicing framework. Compliance with the Preliminary Approval conditions therefore constitutes compliance with these strategic and specific outcomes. Their repetition in the refusal notice does not introduce new issues but rather restates matters resolved through the original approval process.
3	c		Mount Peter local plan code: Purpose 7.2.7.3(1); Overall outcome 7.2.7.3(2)(i), (m) and (n); and PO1 and PO3	The cited Mount Peter Local Plan provisions were addressed under the Initial Approval and Structure Plan, which established the sequencing and infrastructure framework for the site. Compliance with Preliminary Approval conditions, supported by the Pinecrest Water and Sewerage Master Plan, demonstrates that Stages 5A and 5B align with these outcomes. The refusal notice restates issues already resolved.
3	d		Low-medium density residential zone code: Purpose 6.2.10.2(1)(a) and (b); Overall Outcome 6.2.10.2(2)(a) and (c)	Not relevant to report
3	e		Infrastructure works Code: Purpose 9.3.5.2(1); Overall Outcome 9.3.5.2(2)(a) and (d); and PO5 and PO6	The Infrastructure Works Code provisions cited focus on ensuring development is supported by adequate, efficient, and integrated infrastructure. These requirements were embedded in the Preliminary Approval and are addressed through the Pinecrest Water and Sewerage Master Plan, which demonstrates logical and efficient servicing for Stages 5A and 5B. Compliance with approval conditions therefore satisfies these code outcomes, and their inclusion in the refusal notice merely reiterates matters already resolved. In short, the infrastructure works code states that infrastructure must prove satisfactory which has been addressed in the Pinecrest Water and Sewerage Master Plan, and further addressed in this report
3	f		Reconfiguring a lot code: Purpose 9.3.8.2(1)(a),(b) and (f); Overall outcomes 9.3.8.2(2)(i); and PO1, PO13, PO16 and PO21	Not relevant to report
3	g		Preliminary Approval 8/13/2318 Condition 3 (Timing of Effect), Condition 8 (Future Development Applications), Condition 17 (Electricity and Telecommunications) & Condition 25 (Rehabilitation of Waterway Corridors) have not been satisfied; Condition 11 (Water Supply and Sewerage Masterplan) has only been partially addressed	Refer to Condition 11 of the Initial Approval Table
3	h		The Local Government Infrastructure Plan	The Preliminary Approval does not condition the development to align with any specific stage of the LGIP. Instead, it establishes a framework for staging and infrastructure delivery across the PMPC. The Pinecrest Water and Sewerage Master Plan demonstrates that Stages 5A and 5B can be serviced within existing LGIP horizons without premature augmentation, ensuring consistency with the intent of the LGIP.
4			Notwithstanding that the site is located in Precinct 2 Cooper Road, the proposed development is located outside of the Priority Infrastructure Area (PIA) and is premature, out of sequence, and has not adequately demonstrated that it can be serviced by all necessary infrastructure under the LGIP.	While the site is located outside the current PIA, this is not determinative, as the development is proceeding under the framework of the Initial Approval and approved Structure Plan. That approval governs sequencing and servicing, and the Pinecrest Water and Sewerage Master Plan demonstrates that Stages 5A and 5B can be adequately serviced without premature trunk augmentation. The PIA boundaries therefore have no direct relevance to assessment of this application.
5			It has not been demonstrated that the proposed development is able to be serviced by Council's reticulated sewerage and water infrastructure because:	(refer child items)
5	a		To achieve the required available capacity to service the proposed development, the application relies on reducing the sewerage demand of four (4) external, unrelated lots, three (3) of which are located within the PIA boundary and none of which are within the Applicants or Council's control	This matter is addressed in detail within the accompanying report, which outlines the basis for network load adjustments and demonstrates that servicing can be achieved in accordance with the Preliminary Approval framework.

5	b		The proposed development will cause a direct adverse impact via a drop in the minimum water pressure for the existing Mount Peter Residential Estate development below the design criteria in the 2026 scenario	This report demonstrates that the noted pressure drop only occurs when unrelated Pinecrest Stage 2 demand is included in the modelling. Once corrected, residual pressures for the Mount Peter Residential Estate remain above the FNQROC design minimum of 22 m, confirming the proposed development will not cause an adverse impact.
6			The proposed development does not comply with, or it has not been demonstrated that the proposed development can comply with (even with the imposition of lawful conditions):	(refer child items)
6	a		State Planning Policy: State interest - infrastructure integration (1), (2)(a)-(d), (3)(b), and (4); and State interest - transport infrastructure (2) and (3)	Council's notice of rejection lists items from the State Planning Policy (SPP). It is noted that State interests were comprehensively assessed and resolved through the Initial Approval process, which established the Preliminary Approval and Structure Plan. Satisfaction of the conditions of that approval necessarily equates to satisfaction of the relevant State interests, as the Preliminary Approval has already been through State agency referral and assessment. Accordingly, the repetition of SPP matters at this stage does not add any new or independent grounds for refusal. To the extent that they are raised, compliance is demonstrated indirectly through adherence to the Initial Approval. It is considered that the inclusion of these items in the rejection notice overstates their relevance and simply restates matters already addressed in the original approval process.
6	b		Mount Peter local plan code: Purpose 7.2.7.3(1); Overall outcome 7.2.7.3(2)(d) and (i)	The Purpose of the Mount Peter Local Plan Code is to guide the overall development of the PMPC, ensuring coordinated land use and infrastructure delivery. These provisions are broad strategic directions and not directly relevant to the assessment of this application. Importantly, they were addressed and satisfied through the Initial Approval and Structure Plan, which established the framework for subsequent stages. Compliance with that approval therefore demonstrates consistency with these provisions, and the objection does not raise any new issues.
6	c		Infrastructure works code: Purpose 9.3.5.2(1); Overall outcomes 9.3.5.2(2)(a) and (d); PO5 and PO6	These provisions of the Infrastructure Works Code were fully addressed through the Initial Approval, which established the servicing and infrastructure framework for the site. Compliance with the Preliminary Approval conditions demonstrates that these outcomes are satisfied, and their restatement in the refusal notice does not introduce any new grounds for objection.
6	d		Reconfiguring a Lot code: Overall Outcome 9.3.8.2(2)(i)	Not relevant to report
6	e		The Local Government Infrastructure Plan	The Preliminary Approval does not condition the development to align with any specific stage of the LGIP. Instead, it establishes a framework for staging and infrastructure delivery across the PMPC. The Pinecrest Water and Sewerage Master Plan demonstrates that Stages 5A and 5B can be serviced within existing LGIP horizons without premature augmentation, ensuring consistency with the intent of the LGIP.
7			The proposed development has not demonstrated how the development will be serviced by Council's reticulated infrastructure and has relied on reducing the demand of existing lots within the PIA which is not supported by Council. As a result, the only alternative way to service the proposed development is to bring forward the timing of sewer infrastructure for land outside of the PIA and is inconsistent with the timing for the delivery of planned sewer infrastructure in the LGIP. No information has been provided to demonstrate how such infrastructure could be delivered in a logical, orderly and efficient manner without unacceptable impacts.	Council's statement misrepresents the servicing approach adopted for the proposed development. The application does not rely on reducing the demand of existing lots within the PIA. Instead, capacity is achieved by correcting modelling assumptions and removing unrealised or duplicate growth allocations located outside the PIA which, under CRC's own planning framework, are not entitled to priority access to infrastructure capacity. This ensures that all PIA growth entitlements are preserved in full. The Pinecrest Water and Sewerage Master Plan demonstrates that Stages 5A and 5B can be serviced via existing network infrastructure with sufficient downstream capacity available. Sewer modelling confirms that the relevant trunk maintains more than 1 m of freeboard at critical points, consistent with CRC's adopted standards. Importantly, no new trunk infrastructure is proposed or required to service these stages. The development therefore does not trigger or bring forward any LGIP augmentations outside the planned horizon. Accordingly, the proposed development is consistent with the intent of the Preliminary Approval, delivers logical and efficient servicing outcomes, and aligns with the orderly delivery of infrastructure contemplated under the LGIP. The rejection grounds relating to reliance on PIA demand reductions or premature trunk works are not substantiated.
8			The proposed development does not comply with, or it has not been demonstrated that the proposed development can comply with (even with the imposition of lawful conditions):	(refer child items)
8	a		State Planning Policy: State interest - infrastructure integration (1), (2)(a) - (d), (3)(b), and (4); and State interest - transport infrastructure (2) and (3)	Not relevant to report
8	b		Mount Peter local plan code: Overall outcome 7.2.7.3(2)(i)	Overall Outcome 7.2.7.3(2)(i) of the Mount Peter Local Plan Code is a broad strategic provision describing the purpose and intent of the local plan. It is not directly relevant to the detailed assessment of this application, as these matters were addressed and resolved through the Initial Approval and Structure Plan. Compliance with that approval demonstrates satisfaction of this provision.
8	c		Infrastructure works code: Purpose 9.3.5.2(1); Overall outcomes 9.3.5.2(2)(a) and (d); and Performance outcomes PO3, PO5, PO6 and PO11	These provisions of the Infrastructure Works Code were comprehensively addressed under the Initial Approval, which established the servicing framework and assessment benchmarks for the site. Compliance with the Preliminary Approval conditions demonstrates that these outcomes are already satisfied. Their inclusion in the refusal notice does not identify any new or outstanding issues.
8	d		The Local Government Infrastructure Plan	The Preliminary Approval does not condition the development to align with any specific stage of the LGIP. Instead, it establishes a framework for staging and infrastructure delivery across the PMPC. The Pinecrest Water and Sewerage Master Plan demonstrates that Stages 5A and 5B can be serviced within existing LGIP horizons without premature augmentation, ensuring consistency with the intent of the LGIP.

A2. INITIAL APPROVAL CONDITIONS 10 & 11

Condition	Title	Numeral	As Per 8/13/2318	Response
10	Condition 10 (Water Supply and Sewerage Master Plan)		An updated Water Supply and Sewerage Master Plan must be submitted with each application for a Development Permit for Reconfiguring a Lot or Material Change of Use within the Pinecrest Master Planned Community area, where the Master Plan is materially impacted upon. The updated Water Supply and Sewerage Master Plan must include a network analysis and supporting calculations which demonstrates how each stage and the development area ultimately will be internally serviced.	Condition 10 requires that each subsequent application be supported by an updated Water Supply and Sewerage Master Plan where materially impacted, including network analysis and supporting calculations. This requirement has been met within the Pinecrest Water and Sewerage Master Plan and supporting analysis within this report, demonstrating how the proposed stages and the broader development area can be serviced.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)		An updated Water Supply and Sewerage Infrastructure Plan must be submitted with each application for a Development Permit for Reconfiguring a Lot or Material Change of Use within the Pinecrest Master Planned Community area, where the Infrastructure Plan is materially impacted upon. The updated Water Supply and Sewerage Infrastructure Plan for the whole Pinecrest Master Planned Community must include:	(refer child items)
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	a	A hydraulic network analysis demonstrating how the area will be serviced by Council's Infrastructure;	Condition 11(a) requires submission of a hydraulic network analysis demonstrating how the area will be serviced by Council's infrastructure. This requirement is addressed through the Pinecrest Water and Sewerage Master Plan and the updated modelling contained within this report, which provide the necessary network analysis and confirm servicing arrangements.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	b	Identify external catchments of the development/stage that will be connected to or serviced by the internal sewer or water networks;	there are no external catchments directly connected to the proposed development. The only potentially impacted areas are within the neighbouring Mount Peter development, which has been well documented in the Pinecrest Water and Sewerage Master Plan. The analysis confirms that these catchments maintain their required levels of service and are not adversely affected.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	c	Identify any existing or new trunk infrastructure external to the development/stage that may require upgrading or implementing to accommodate the development.	The supporting analysis demonstrates that no new trunk infrastructure is required. The existing downstream networks have sufficient verified capacity, and the development can be fully serviced without bringing forward or implementing external trunk upgrades.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	d	Demonstrate how the development/stage has regard for capacity thresholds of existing water and sewerage infrastructure available for development of the Mount Peter initial development area. Priority must be given to development within the priority infrastructure area.	The development does not reduce or reallocate demand reserved by lots within the PIA. All PIA growth entitlements are preserved, with capacity achieved through correction of unrealised loads external to the PIA. The proposal therefore maintains priority for PIA development while demonstrating compliance with existing network capacity thresholds.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	e	With each stage assess the development immediately prior to the next infrastructure augmentation to demonstrate compliant servicing is provided by the water supply and sewerage system at the staging threshold that is required.	This requirement has been addressed through the Pinecrest Water and Sewerage Master Plan and the updated analysis provided in this report. The assessment demonstrates that Stages 5A and 5B can be serviced within existing network capacity immediately prior to the next planned augmentation, ensuring compliant servicing at the required staging threshold.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	f	Assess the water supply system prior to implementation of the High Level Reservoir to confirm the extent of the development that can be serviced.	This condition is satisfied. The Pinecrest Water and Sewerage Master Plan assessed the water network performance prior to the implementation of the High Level Reservoir and other planned augmentations. The analysis confirms the extent of development that can be serviced within existing infrastructure, consistent with the intent of the condition.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	g	Confirm the sizing and catchment boundaries of the interim booster pump stations (e.g. W001 and W002) required to service the development stages prior to implementation of the High Level Reservoir. Include details on the planned year of commissioning and demand requirements over the period of service.	Condition 11(h) is addressed within the Pinecrest Water and Sewerage Master Plan and the supporting modelling provided in this report. The interim booster pump station has been included in all network scenarios and is appropriately sized to accommodate the demands of Stages 5A and 5B prior to the implementation of the High Level Reservoir. The modelling confirms both catchment boundaries and capacity, consistent with the condition requirements.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	h	WMF042 is planned by Council as part of the low level trunk reticulation network to be serviced from the Low Level Reservoir. It is understood that WMF042 is identified to service part of the development from the existing water network prior to implementation of the High Level Reservoir. The infrastructure z plan is to provide further information about the continued utilisation of WMF042 following implementation of the High Level Reservoir and associated high level trunk reticulation network.	This condition is not directly relevant to the current application for Stages 5A and 5B, as the proposed development does not include or rely on WMF042. The servicing strategy for 5A and 5B is addressed through the Pinecrest Water and Sewerage Master Plan and associated modelling, independent of this future Council-planned asset.
11	Condition 11 (Water Supply and Sewerage Infrastructure Plan)	i	Identify the catchment boundaries for each connection point to Council's existing and planned sewerage system.	The Pinecrest Water and Sewerage Master Plan and supporting modelling provided in this report identify the catchment boundaries for each connection point to Council's existing and planned sewerage system. For Stages 5A and 5B, the catchments have been clearly defined and demonstrate that flows can be accommodated within the existing downstream system without the need for premature augmentation.

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