

16 June 2026

Economic Development Queensland

Attn: Amanda Dryden

GPO Box 2202

Brisbane, QLD, 4001

Re. Economic Development Queensland Outstanding Matters Response Letter for Reconfiguring a Lot application (DEV2025/1676) over land at 4745 – 4759 and 4761-4773 Mount Lindesay Highway, North Maclean.

Dear Amanda,

The following letter has been provided in response to Economic Development Queensland's (**EDQ**) Outstanding Matters request issued on 6 May 2026 (**Attachment 1**), in relation to the Development Application (**DA**) for Reconfiguring a Lot for 2 lots into 17 lots (**DEV2025-1676**). The development is located over land at 4745-4759 and 4761-4776 Mount Lindesay Highway, North Maclean, more properly described as Lot 7 and Lot 8 on RP137101 (herein referred to as 'the **Site**').

EDQ has undertaken a further assessment of the abovementioned DA and the response provided for the Outstanding Matter Request dated 22 December 2025 and notes some biodiversity values remain outstanding.

This letter provides information on Item 1 (Biodiversity Values) of EDQ's Outstanding Matters Request (refer **Attachment 1**).

1. Outstanding Matters Response

Item 1 – Biodiversity Values

Issue:

Provide amended subdivision plans, including a change to the cul-de-sac location in the Industrial Access Street, removing lots at the western end of the site identified as containing ground-truthed impacted vegetation plus a 50m protection buffer.

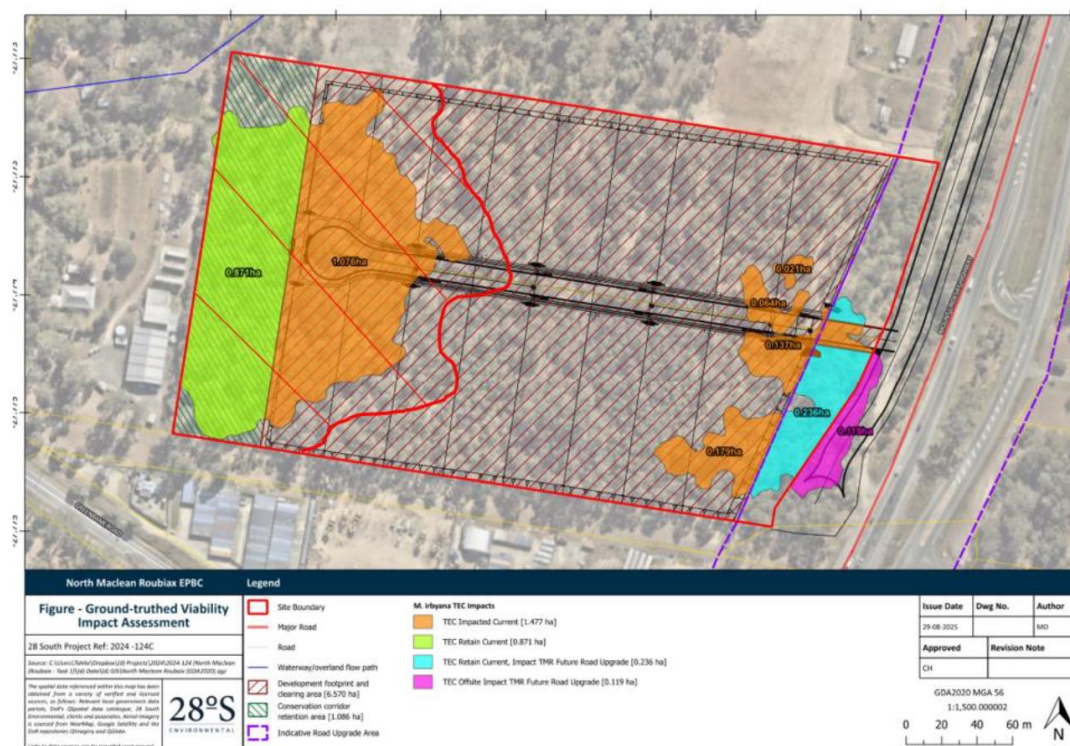


Figure 1: Overall Layout Plan with overlay of impacted vegetation and 50m buffer

Response to Item 1

The Outstanding Matters Request seeks amended subdivision plans that relocate the cul-de-sac within the Industrial Access Street and remove proposed lots at the western end of the Site to accommodate ground-truthed impacted vegetation and a 50 metre (m) protection buffer.

The Applicant has carefully considered EDQ's requested retention area and associated subdivision amendments. However, the Applicant does not consider the extent of the proposed retention area identified by EDQ to be a reasonable or necessary development outcome having regard to the Site's planning context, ecological characteristics and surrounding land uses.

As previously outlined in 28 South's correspondence dated 26 August 2025, detailed ecological investigations were undertaken across the Site in accordance with PDA Guidelines 14 and 17. These investigations identified that the vegetation along the western portion of the Site represented the highest ecological value vegetation on the Site

due to its structural characteristics and partial connectivity with adjacent regrowth vegetation. Accordingly, this area was conservatively assessed as potentially viable vegetation and has informed the development design response.

In response to previous EDQ comments, the development layout was amended to incorporate a 50m vegetation buffer along the western boundary of the Site. Included within this latest response letter is an updated impact assessment figure (**Figure 1**) that contemporises impact areas relative to the updated development layout (**Attachment 2**). This buffer retains approximately 1.187 ha of land, including approximately 0.941 ha of ground-truthed Category B vegetation comprising Regional Ecosystem 12.3.18 and the Swamp Tea-tree (*Melaleuca irbyana*) Threatened Ecological Community. The buffer area avoids both direct and indirect impacts and excludes stormwater and development infrastructure.

The Applicant does not consider that the additional retention area sought by EDQ would provide a meaningful ecological or connectivity outcome beyond that already achieved through the incorporated 50m buffer that connects to the retained 50m vegetation buffer to the north.

While the EDQ requested retention area would increase the overall extent of vegetation retained on the Site, it would remain isolated and constrained by the surrounding urban and industrial context. The retained vegetation would be bordered by established industrial development immediately adjoining the western boundary, approved industrial development to the north, existing commercial and industrial development to the south, and Mount Lindesay Highway and future highway upgrades to the east.

Importantly, the land immediately adjoining the western boundary of Site at 41–53 Scott Lane has been utilised for industrial and warehouse-related purposes (timber supplier) for decades and contains existing approved industrial buildings and associated infrastructure (MCUI/95/1996). This includes an existing homestead, two large sheds located along the Site's western boundary (timber supplier's eastern boundary), numerous timber drying racks, a rainwater tank and other ancillary infrastructure. Recent satellite imagery is provided below in **Inset 1** which visualises these uses and existing land condition. Accordingly, the western interface of the Site does not adjoin an existing ecological corridor or conservation area, but rather an established industrial land use.



Inset 1: 41–53 Scott Lane current site usage as of 6 February 2026 (Source: NearMap, 2026).

These existing and approved development outcomes substantially limit opportunities for fauna movement and ecological connectivity through the Site and the surrounding locality particularly eastward. Retention of the additional vegetation sought by EDQ would therefore result in a larger isolated vegetation patch that does not establish a functional ecological corridor or materially improve landscape-scale connectivity outcomes.

The Applicant considers that the extent of the requested retention area would effectively sterilise additional industrial land without delivering a corresponding environmental benefit. Further, given the irregular configuration of the EDQ proposed retention area, the incorporation of this area into a development design would not be sympathetic to a balanced development outcome. Combined with the constrained nature of the surrounding landscape, the EDQ requested redesign would reduce the efficiency of the approved industrial development pattern while providing limited ecological gain.

Notwithstanding the above, the Applicant has reviewed the subdivision layout and reproduced the development footprint to maintain the approved development intent of creating 17 industrial lots while maintaining protection of retained vegetation (refer **Attachment 2**).

The revised layout retains the 50m vegetation buffer along the western boundary and proposes that the retained vegetation areas associated with Lots 1 and 9 be permanently protected through the establishment of a private covenant. The covenant will ensure the ongoing protection and management of the retained vegetation through the greatest legal means practical. The covenant will be applied to the vegetation with the highest ecological value on the Site with the intent to retain this vegetation in perpetuity.

The Applicant notes that the southern portion of the Site is constrained by the proposed stormwater swale located within the 22m easement adjoining the southern boundary, while a pipeline easement constrains development opportunities along the northern boundary. These infrastructure constraints have been incorporated into the subdivision design and further limit opportunities for alternative lot configurations.

In summary, the Site is located within the Greater Flagstone Priority Development Area and is assessed under the Greater Flagstone Urban Development Area Development Scheme. Consistent with the ecological investigations undertaken in accordance with PDA Guidelines 14 and 17, the revised subdivision layout retains the highest ecological value vegetation on the Site, avoids direct and indirect impacts to that vegetation where practical, and secures its long-term protection through covenant mechanisms while continuing to facilitate the intended industrial development outcome.

Accordingly, the Applicant considers that the proposed 50m buffer and covenant-protected vegetation area represent an appropriate and balanced outcome that responds to the ecological values present on the Site while maintaining the orderly and efficient development of industrial land within the PDA.

We trust that this letter has sufficiently addressed the relevant items raised in EDQ's Outstanding Matters Request. If further information is required, please don't hesitate to contact the team via the details provided below.

Kind regards,



Christopher Huff

Principal Environmental Consultant

M: 0452449110

E: Christopher@28south.com.au

Figure 1 – Updated Impact Assessment

Attachment 1 – EDQ's Outstanding Matters Request

Our ref: DEV2025/1676

6 May 2026

Roubaix Properties Pty Ltd
C/- Urbis Ltd
Attn: Erin Brooks and Jorja Feldt
ebrooks@urbis.com.au; jfeldt@urbis.com.au

Dear Applicant

Outstanding Matters

Priority Development Area (PDA):	Greater Flagstone PDA
PDA Development Approval:	Development Permit for Reconfiguring a Lot for 2 lots into 17 lots
Property Location:	4745-4759 and 4761-4773 Mount Lindesay Highway, North Maclean
Property Description:	Lots 7 and 8 on RP137101

After undertaking a further assessment of the abovementioned PDA Development Application and the information provided on 21 November 2025 and 4 March 2026 as part of the response to the Information Request dated 19 September 2025 and the Outstanding Matters Request dated 22 December 2025, the following information remains outstanding:

1. Biodiversity Values

Provide amended subdivision plans, including a change to the cul-de-sac location in the Industrial Access Street, removing lots at the western end of the site identified as containing ground-truthed impacted vegetation plus a 50m protection buffer.

Any approval will be subject to conditions to prevent development occurring on the part of the site shown within the dashed red box in Figure 1 below.

Figure 1: Overall Layout Plan with overlay of impacted vegetation and 50m buffer

Please note, an interim connection to Mount Lindesay Highway to facilitate the clearing of the site or earthworks is not supported by EDQ or the DTMR. Any approval will be subject to conditions requiring the dedication and construction of the service road prior to any development, including clearing, occurring on the site.

The requested information is required within 30 business days from the date of this letter. Please forward your response to these outstanding matters to EDQ Development Services at developmentservices@edq.qld.gov.au

If you require any further information, please contact Rachel Ritchie, Principal Planner on (07) 3522 8586 or by email at rachel.ritchie@edq.qld.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Dryden', with a stylized, cursive script.

Amanda Dryden
**Group Director – Established Growth
Development Services
Economic Development Queensland**

Attachment 2 – Revised Development Layout



Issue	Description	Date	Surveyor	Locator	Drafter	Checked	NOTES:	CLIENT:	LOGAN-FLAGSTONE INDUSTRIAL	SUNRISE SURVEYING	Hz Datum: MGA2020 556 (Ground) Hz Origin: PSM196908 Easting: 500.871 951 Northing: 6.927.729 973 Scale Factor MGA to Ground 1.040445	Surveyed: September 2025 Contour Interval: NA Vertical Datum: AHD Vertical Origin: PSM196908 Origin RL: 27.348m	PROJECT: LOGAN FLAGSTONE INDUSTRIAL LOT CALCULATIONS PLAN of LOTS 1-17 and EMTs A-T Canceling Lots 7 & 8 on RP137101 NORTH MACLEAN, LOGAN CITY COUNCIL
A	First Issue	12/09/2025	LJM	NA	MJI	MJI	PURPOSE OF PLAN This plan represents the proposed Lots, their dimensions and areas.						
B	Added PMT sites to Lots 11 & 15	22/01/2026	LJM	NA	MJI	MJI	PROPERTY BOUNDARIES The surrounding subject property boundaries shown on this plan are plotted from the Surround Survey as per IS337179 The layout is based on the Preliminary Design plans from Burchills Engineering Solutions • BE220566-DA C1101 Version D dated 10/06/2026 and • BE220566-DA C5101 Version D 10/06/2026						
C	Added Lots 100 & 901 and Easements	11/06/2026	LJM	NA	MJI	MJI	SECONDARY INTERESTS Easements A-R are for drainage purposes, in favour of upstream lots Easement T is for drainage purposes, in favour of Council Easements and Covenants are yet to be finalised, awaiting OPW approval Secondary Interests Table to be provided once confirmed						
D	Remove lots 100 & 901 add Easements R & S	13/06/2026	LJM	NA	MJI	MJI	ROAD NAMES Road names are yet to be approved by Logan City Council PMT/RMU sites yet to be finalised and Easements added (if required)						