

Attachment D – SARA Pre-lodgement Advice

SARA reference: 2606-52892 SPL

22 June 2026

Mr Marcus Dryden
marcus.dryden@engeny.com.au

Dear Mr Dryden

SARA Pre-lodgement advice – 341 Bellmere Road, Bellmere

I refer to your pre-lodgement request received on 10 June 2026 in which you sought pre-lodgement advice from the State Assessment and Referral Agency (SARA) regarding the proposed development at the above address. This notice provides advice on aspects of the proposal that are of relevance to SARA that is based on the documentation uploaded into MyDAS2 on event date.

Development details

Summary of proposal:	SARA understands that the proponent (Engeny as commissioned by AVID Property Group) is seeking advice related to waterway barrier works (WWBW) for a future residential development at 343 Bellmere Road, Bellmere, formally described as Lot 4001 on SP346087 (subject site). Specifically, the proponent has submitted a waterway determination memorandum and is seeking advice about future development approval requirements, noting that the drainage feature is not conducive to fish passage and the need to consider fish passage for this drainage feature within a portion of the development should be removed. The proponent provided a memorandum outlining the watercourse determination assessment for the subject drainage feature. The proposed upstream extent of the mapping is shown in the attached memorandum. The drainage feature is currently mapped as a green waterway in the Queensland Waterway for WWBW mapping.
Description:	Operational work for WWBW
SARA role:	TBC
SARA jurisdiction:	Schedule 10, Part 6, Division 4, Subdivision 1 – Assessable development that is operational work for WWBW
Street address:	341 Bellmere Road, Bellmere
Real property description:	Lot 4001 on SP346087

Pre-lodgement advice

SARA provides the following pre-lodgement advice:

Table 1: SARA advice in response to applicant's request

1.	Advice requested: Confirmation of waterway determination. <u>Constructing or raising waterway barrier works</u> Under the Planning Regulation 2017 (Planning Regulation), works involving constructing or raising WWBW must be undertaken in accordance with the relevant ADR or under a development approval (assessable development). The proposed development may involve works that constitute assessable WWBW. As a standalone body of works, this would require a development application to be lodged with SARA as the assessment manager for operational work that is constructing or raising WWBW under the following provision of the Planning Regulation: • Schedule 8, Table 4, Item 3(b) – Operational work that is constructing or raising WWBW. SARA's assessment will be under the following provision of the Planning Regulation: • Schedule 10, Part 6, Division 4, Subdivision 2, Table 1, Item 2 – Operational works that is constructing or raising WWBW.
2.	A waterway is defined in schedule 1 of the <i>Fisheries Act 1994</i> as including a river, creek, stream, watercourse, drainage feature or inlet of the sea. Fisheries Queensland identifies three key attributes that indicate the presence of a waterway as defined in the <i>Fisheries Act 1994</i> – an on ground feature must have at least one of these attributes to be considered a waterway: • Defined bed and banks - waterways generally have defined bed and banks, however, can contain less defined sections that connect more defined sections during periods of flow. • Adequate flow - The flow of water needs to be sufficient to sustain basic ecological processes and habitats, and maintain biodiversity within, or across, the water channel. The adequacy of flow depends on the ecological function of the channel. Some waterways that connect to a fish habitat like wetland or waterhole may only need infrequent and short-duration flows to provide connectivity for fish passage. • Fish habitat at, or upstream of, the site - Most instream features provide habitat for fish during adequate flow conditions, or in pools during dry periods. The ability to provide constant or periodic connectivity to upstream and off-stream fish habitat is considered a feature of a waterway. To determine if this connectivity exists, you'll need to have some knowledge of fish species at the site and how they use their habitat, particularly in headwater streams. The proponent's submitted report/s propose that Features 1 (pictured in Figure 1 below) is not a waterway for WWBW upstream of -27.087514, 152.898239 within the subject site. Based on the available information, SARA advises that Feature 1 is <u>not a waterway</u> for WWBW upstream of -27.087514, 152.898239 within the subject lot (Figure 2). Works within this feature upstream of -27.087514, 152.898239 would not constitute WWBW. Reasoning for this is provided below (Figure 3). It is recommended that you seek further pre-lodgment advice through the SARA for any development planned within the waterway downstream. Any fish salvage on site must be undertaken generally in accordance with the Department of Primary Industries (DPI) guidance on Fish salvage found on the Business Queensland website.

This advice is provided in good faith and is:

- based on the material and information provided to SARA
- current at the time of issue
- not applicable if the proposal is changed from that which formed the basis of this advice.

This advice does not constitute an approval or an endorsement that SARA supports the development proposal. Additional information may be required to allow SARA to properly assess the development proposal when a formal application has been lodged.

If you require further information please contact Alice Davis, Principal Planning Officer, on (07) 5644 3223 or via email SEQNorthSARA@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Stephanie Clement
A/Principal Planning Officer

Figure 1 Waterway subject of this advice circled in yellow:



Figure 2 Feature 1- Works upstream of -27.087514, 152.898239 does not constitute waterway barrier works.



Figure 3: data to support advice:

Feature	Evidence, findings, and reasons for the advice
1.	• Within Lot 4001SP346087 Feature 1 is displayed as a green mapped waterway on the Queensland waterways for waterway barrier works mapping layer. • The feature is correctly mapped on the watercourse identification mapping layer on Queensland Globe and was a natural feature. • However, upstream of -27.087514, 152.898239, a series of constructed dams is present for approx. 500m before the end of the waterway. • Fish passage is limited into the dam due to the slope of the bywash channel. • The area of catchment upstream of the feature is limited in size. • Works within Feature 1 upstream of -27.087514, 152.898239 would not further limit free movement of fish to upstream habitats.