

Ref: 23-0214P/03

2 June 2026

The Chief Executive Officer

Brisbane City Council

GPO Box 1434

BRISBANE QLD 4001

Via: Council's Online Lodgement Portal

RE: Request to Change a Development Approval (s78 of the Planning Act 2016)
Development Permit for a Material Change of Use for Food and Drink Outlet,
Shop and Service Station – A006795238
347 Albany Creek Road, Bridgeman Downs QLD 4035 (Lot 3 on SP227432)

To Whom it May Concern,

Introduction

On behalf of Citimark Properties Pty Ltd (**Applicant**), Therefor Group hereby requests to make a Change application (Minor) to a Development Approval (Council reference: A006795238) in accordance with section 78 of the *Planning Act 2016* (**Planning Act**), over land at 347 Albany Creek Road, Bridgeman Downs and formally described as Lot 3 on SP227432 (**site**).

In accordance with section 79 of the Planning Act, we confirm the application:

- is made in the approved form, having been accompanied by the relevant Queensland Government form, being the Planning Act Form 5 - Change application form;
- will be accompanied by the required fee, once the respective invoice has been issued by Brisbane City Council (**Council**);
- is not subject to any pre-request response notice; and
- is accompanied by the written consent of the owner.

On the basis of the above, we request that Council confirm their acceptance of the application in accordance with section 79(2) of the Planning Act.

Application Fees

In accordance with Council's Schedule of Fees and Charges 2025-26, the application fee is **\$3,432**. We request that Council issue the application fee quote to allow payment to occur.

Conclusion

We would appreciate if Council would now proceed with its assessment of this proposed development. Should Council have any further queries regarding this application, please do not hesitate to contact the undersigned on (07) 3666 5200.

Brisbane
Turrbal and Yuggera Country
Longland Place, Level 2
76 Skyring Terrace
Newstead QLD 4006
PO Box 436 New Farm QLD 4005
Ph +61 7 3666 5200
brisbane@thereforgroup.com.au

Sunshine Coast
Gubbi Gubbi Country
Building 1
30 Chancellor Village Blvd
Sippy Downs QLD 4556
Ph +61 7 5294 0374
sunshinecoast@thereforgroup.com.au

Gold Coast
Kombumerri Country
Level 1
24 Bay Street
Southport QLD 4215
Ph +61 7 5636 9943
goldcoast@thereforgroup.com.au

ABN 61 147 343 084
ACN 147 343 084

www.thereforgroup.com.au



Yours sincerely,

Gomarchio

Gabriella Tomarchio

SENIOR PLANNER

Minor Change Application

1. Introduction

This Change application (minor) seeks to obtain Council’s approval to amend the approved built form and site layout (Council reference: A006795238). The proposed changes are sought to accommodate the requirements of committed tenants and matters identified in the detailed design process. Further details of the proposed change are set out below and in the supporting documentation. Importantly, the proposed changes are minor and do not result in substantially different development.

To guide a reader to the report’s structure, please note that:

- **Section 2** provides an overview of the current Development Approval.
- **Section 3** provides details of the proposed changes.
- **Section 4** outlines the proposed changes to the approved documents and development conditions.
- **Section 5** provides an assessment of the proposed changes against the minor change criteria.
- **Section 6** provides an evaluation against the relevant assessment criteria contained in section 81 of the Planning Act.

To assist with Council’s assessment of the Change application, the following supporting material is provided which form part of the application.

Table A – Supporting Material

Document Title	Prepared By	Date
Title Search	-	-
Signed Owner’s Consent	-	-
Planning Act Form 5 – Change Application Form	Therefor Group	1.05.2026
Architectural Plans	Verve Design Group	5.05.2026
Landscape Concept Plan	Laudink	12.05.2026
Advice Letter	Intotum	14.05.2026

2. Development Approval

2.1. Overview

On 31 March 2025, Council granted a development approval for a Development Permit for a Material Change of Use for Service Station (300m² GFA) pursuant to the Brisbane City Plan 2014 – Version 27 (Council reference: A006349786). The development application was subject to Code Assessment and referral to the Chief Executive, being the State Assessment and Referral Agency (**SARA**), was required and subsequently a Referral Agency Response (with conditions) was issued on 11 October 2024. The development approval has a currency period of 6 years (inclusive of all its parts) and will end on 30 June 2031.

On 6 February 2026, Council granted a Change application (Other Change) to amend the above-described development approval (Council reference: A006795238). The Other Change application facilitated the addition of a standalone fast food restaurant (Food and Drink Outlet 1), and the addition of a drive-through component (Food and Drink Outlet 1) within the footprint of the approved Service Station. It was subject to Impact Assessment and obtained 39 properly made submissions. A Referral Agency Response (with conditions) was issued from SARA on 5 September 2025. This Other Change application is herein referred to as the **Development Approval** and is the subject of this Change application (minor). A copy of the approved Site Plan is shown at **Figure 1** below.

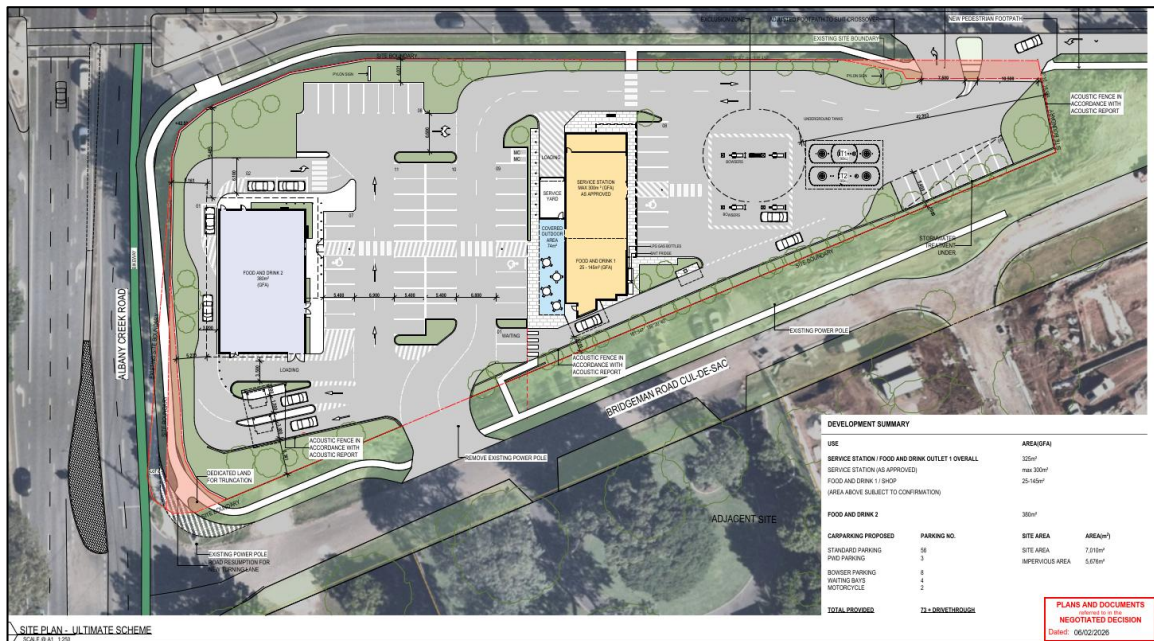


Figure 1: Extract of Approved Site Plan (SD1003, Rev 4)

3. Proposed Change

3.1. Overview

The purpose of this Change application (minor) is to obtain Council’s approval to amend the built form and site layout predominantly associated with the approved service station building of the Development Approval. The proposed changes are sought to accommodate the requirements of committed tenants and matters identified in the detailed design process. As per the **Architectural Plans**, the proposed changes are summarised as follows:

- Removal of part of the service station canopy.
- Addition of PMT and subsequent amendment to the landscaping at Bridgeman (cul-de-sac) Road.
- Overall reduction of landscaping across the site by approximately 2.8%.
- Slight change to the car parking configuration between the service station building and Food and Drink Outlet 2, representing a total of one (1) additional car parking space across the site.
- Changed orientation to underground tanks.
- Amendments to the store entrance of the service station building and building façade to align with tenant needs and branding.

Further details of the proposed changes are set out in the following sections of this letter. Importantly, the proposed change:

- Maintains the approved maximum GFA of 325m² for the service station building. The tenancy distribution is amended to suit the requirements of the committed tenants.
- Maintains the approved GFA of 380m² for Food and Drink Outlet 2.
- Maintains the approved site access arrangements at Bridgeman Road and Bridgeman (cul-de-sac) Road.
- Maintains the approved acoustic barriers and approved stormwater solution.
- Does not necessitate an amendment to the Referral Agency Response (Reference: 2507-47013 SRA) as new matters are not introduced.

3.2. Service Station Canopy

As per the **Architectural Plans** and **Figure 1** below, it is proposed to remove part of the approved service station canopy, specifically the pedestrian walkway link from the bowers to the building. This change is reflective of the standard design of the committed service station operator. A canopy remains over the Fuel Dispensing Area to minimise impacts of rain in accordance with condition 24 of the Development Approval.

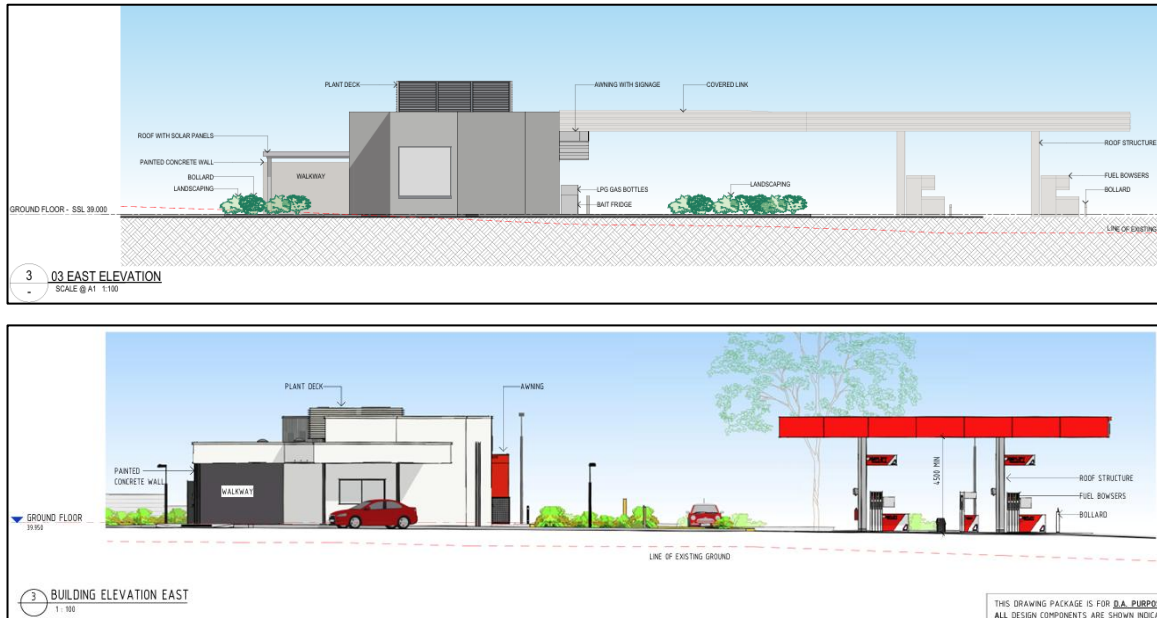


Figure 1: Approved (top) and Proposed (bottom) Service Station Canopy – East Elevation

3.3. Underground Tanks

The proposed Change application seeks a 90-degree rotation to the approved Underground Petroleum Storage System (UPSS) tanks to ensure compliance with the manufacturer’s recommended maximum burial depth requirements. This proposed change maintains compliance with conditions 15 to 26 of the Development Approval. Please refer to the **Advice Letter** prepared by Intotum for further detail.

3.4. Landscaping

The proposed Change application seeks minor amendments to the approved Landscape Concept Plan as a consequence of the detailed design process. As per the **Landscape Concept Plan**, these changes include:

- Addition of a PMT on the Bridgeman (cul-de-sac) road frontage to service the development site.
- Slight change to the car parking configuration between the service station building and Food and Drink Outlet 2.
- Overall reduction of landscaping across the site by approximately 2.8%.

Approval of the updated Landscape Concept Plan is sought to ensure compliance with condition 12 of the Development Approval.

4. Impacts on Conditions of Approval / Approval Documentation

4.1. Changes to Approved Drawings and Documents

To facilitate the proposed changes, we request that the approved drawings and documents are updated as outlined in **Table B** below in red.

Table B – Summary of Proposed Changes

Drawing or Document	Number	Plan Date
Functional Layout Option 1 Sheet 1	DA-C005 Rev D (Amended in Red 31-JAN-2025)	18-NOV-2024 (Received)
Functional Layout Option 1 Sheet 2	DA-C006 Rev D (Amended in Red 31-JAN2025)	18-NOV-2024 (Received)
Functional Layout Option 2 Sheet 1	DA-C007 Rev A	18-NOV-2024 (Received)
Functional Layout Option 2 Sheet 2	DA-C008 Rev A	18-NOV-2024 (Received)
Floor Plan – Ground Floor Proposed Floor Plan	SD2001 Issue 07 DA02 Revision A	16-AUG-2024 (Received) 5 MAY 2026
Arboricultural Impact Assessment	IAS13642 Rev 5	18-NOV-2024 (Received)
Acoustic Barrier Plan	SD1003 Issue 04 (Amended in Red 08-SEP-2025)	21-AUG-2025 (Received)
Landscape Concept Plan	SK100 Rev D, SK102 Rev D, SK110 Rev D, SK120 Rev D SK102 Rev E, SK110 Rev E, SK120 Rev E	21-AUG-2025 (Received) MAY 2026
Site Based Stormwater Management Plan	23197A Revision B (Amended in Red 04-SEP-2025)	12-JUN-2025 (Received)
Site Plan – Ultimate Scheme Proposed Overall Site Plan	SD1003 Issue 04 DA01 Revision A	21-AUG-2025 (Received) 5 MAY 2026
Floorplan	DA101 Issue E	21-AUG-2025 (Received)
Corral layout	DA611 Issue C	21-AUG-2025 (Received)
West & North Building Elevations	DA201 Issue C	21-AUG-2025 (Received)
East & South Elevations	DA202 Issue C	21-AUG-2025 (Received)
Acoustic Screen Elevations	DA205 Issue B	21-AUG-2025 (Received)
Elevations – Sheet 01 Building Elevations & Perspectives	SD3001 Issue 03 DA03 Revision A	21-AUG-2025 (Received) 5 MAY 2026
Elevations – Sheet 02 Building Elevations & Perspectives	SD3002 Issue 03 DA04 Revision A	21-AUG-2025 (Received) 5 MAY 2026

4.2. Changes to Conditions of Approval

We request that the existing conditions are generally maintained and updated to be reflective of the proposed changes and supporting information. The requested changes to the development conditions are outlined in **Table C** below in red.

Table C – Changes to Conditions of Approval

Conditions

41) Access, Grades, Manoeuvring, Carparks, Signs and Line Marking

(iv) For the Service Station & Food and Drink Outlet 1 component of the development, provide parking on the site for ~~27~~ **28** x cars, including 2 x parking space for people with disabilities, 2 x motorcycle parking spaces.

(v) For the Food and Drink Outlet 2 component of the development, provide parking on the site for 32 x cars, including 1 x parking space for people with disabilities.

5. Assessment Of Minor Change

5.1. Overview

The Planning Act establishes two types of changes to a development approval:

- A ‘minor change’ to a development approval: or
- An ‘other change’ to a development approval.

For a change application to be considered as a minor change, the change to the development approval must meet the definition of a ‘minor change’ as set out in Schedule 2 of the Planning Act. See below.

‘A change that—

b. for a development approval—

- i. would not result in substantially different development; and
- ii. if a development application for the development, including the change, were made when the change application is made would not cause—
 - A. the inclusion of prohibited development in the application; or
 - B. referral to a referral agency, other than to the chief executive, if there were no referral agencies for the development application; or
 - C. referral to extra referral agencies, other than to the chief executive; or
 - D. a referral agency to assess the application against, or have regard to, matters prescribed by regulation under section 55(2), other than matters the referral agency must have assessed the application against, or have had regard to, when the application was made; or
 - E. public notification if public notification was not required for the development application’.

With respect to item (b)(i), Schedule 1 of the Development Assessment Rules provides guidance on the determination of whether a proposed change does or does not constitute ‘substantially different development’. These provisions are for guidance only and must be considered in the context of the proposed change. A proposal that does not meet these guidelines may still potentially be determined as ‘not substantially different development’.

A full assessment of the proposed changes against the relevant criteria has been completed and outlined in **Table D** and **Table E** below. As shown, our assessment concludes that the proposed changes do not constitute ‘substantially different development’ and comply with the criteria specified under the definition of a ‘minor change’ within Schedule 2 of the Planning Act.

5.2. Schedule 2: Minor Change Criteria

Table D – Assessment Against Minor Change Criteria (Planning Act)

Criteria	Y/N	Comments
Would a new development application, including the changes cause:		
The inclusion of prohibited development?	N	The proposed change to will not include prohibited development; the proposed development is not listed at Schedule 10 of the Planning Regulation as prohibited development.
Referral to a referral agency, other than to the Chief Executive, if there were no referral agencies for the development application?	N	The original development application was referred to the Chief Executive for State transport corridor matters.
Referral to extra referral agencies, other than the Chief Executive?	N	The proposed change will not trigger referral to any extra referral agencies under Schedule 10 of the Planning Regulation.
A referral agency to assess the application against or have regard to new matters?	N	The proposed change, under Schedule 10 of the Planning Regulation, will not require a

referral agency to assess the application against or have regard to new matters.

Public notification if public notification was not required for the development application?	N	The development application was impact assessable, and was publicly notified.
--	---	---

5.3. Substantially Different Development Test

Table E – Assessment Against Substantially Different Development Test (DA Rules)

Criteria	Y/N	Comments
Do the changes:		
Involve a new use?	N	The proposed change will not introduce a new land use.
Result in the application applying to a new parcel of land?	N	The proposed change to the approval will not result in the application applying to a new parcel of land.
Dramatically change the built form in terms of scale, bulk and appearance?	N	<p>The proposed change does not dramatically change built form in terms of scale, bulk and appearance, notably:</p> <ul style="list-style-type: none"> ▪ Maintains the approved maximum GFA of 325m² for the service station building. The tenancy distribution is amended to suit the requirements of the committed tenants. ▪ Maintains the approved GFA of 380m² of Food and Drink Outlet 2. ▪ The removal of part of the service station canopy assists with reducing the perceived bulk of the service station building by providing separate built form / structural components. However, this change does not fundamentally alter the appearance of the service station building or development site. ▪ The proposed façade changes to the service station building and addition of colour improve the visual amenity.
Change the ability for the approved use to operate as intended?	N	<p>The proposed change will not alter the ability for the use to operate as intended, on the following basis:</p> <ul style="list-style-type: none"> ▪ It maintains the approved maximum GFA of 325m² for the service station building. The tenancy distribution is amended to suit the requirements of the committed tenants. ▪ Maintains the approved GFA of 380m² of Food and Drink Outlet 2. ▪ It maintains the approved site access arrangements at Bridgeman Road and Bridgeman (cul-de-sac) Road.

		<ul style="list-style-type: none"> ▪ The internal hardstand and maneuvering areas are consistent with the Development Approval. ▪ It maintains the approved acoustic barriers and approved stormwater solution.
Remove a component that is integral to the operation of the development?	N	As described above, the proposed change will not impact on a component that is integral to the operation of the development.
Significantly impacts on traffic flow or the transport network?	N	The proposed change seeks a reconfiguration to the car parking between the service station building and Food and Drink Outlet 2. Overall, an addition of one (1) car parking space is proposed and is associated with the service station building. The additional car park will not significantly impact on traffic flow or the transport network.
Introduce new impacts or increase the severity of known impacts?	N	The proposed change will not introduce new impacts, or increase the severity of known impacts.
For a development prescribed by the Planning Regulation as requiring social impact assessment as identified under section 106T of the Act –	N/A	The proposed development is not for development that requires a social impact assessment prescribed by the Planning Regulation.
Introduce new social impacts or increase the severity of known social impacts?		
Remove an incentive or offset component that would have balanced a negative impact of the development?	N	The proposed change will not require the removal of an incentive or offset component that would have balanced a negative impact of the development.
Impact on infrastructure provisions?	N	The proposed change will not impact on infrastructure provisions.

6. Evaluation Against Relevant Assessment Criteria

Section 81(2) of the Planning Act sets forth criteria the responsible entity assessing a minor change application must consider. A response to the relevant assessment criteria is provided below to assist with Council’s assessment.

2. *In assessing the change application, the responsible entity must consider—*
 - a. *the information the applicant included with the application; and*

Response to Subsection 2(a)

This correspondence and the supporting documentation provide a brief background of the approval history along with a detailed overview of the proposed change to the development approval. It is considered that this correspondence, supporting plans and documents provide all information required to assess the Change Application (minor).

- b. *if the responsible entity is the assessment manager—any properly made submissions about the development application or another change application that was approved; and*

Response to Subsection 2(b)

The original development application was subject to Impact Assessment and public notification. It is noted that a total of 39 properly made submissions were made to Council during the public notification period of the original development application. Matters raised in these submissions relate to land use, drive-through aspect of Food and Drink Outlet 1, built form, landscaping, economic need, hours of operation, odour and air quality, light pollution, littering, traffic and car parking location.

The following comments are made with respect to these matters:

- The proposed change maintains the approved maximum GFA of 325m² for the service station building and 380m² for Food and Drink Outlet 2.
- The proposed change does not alter the drive-through locations for Food and Drink Outlet 1 and 2.
- The proposed change does not alter the approved built form associated with Food and Drink Outlet 2.
- The 2m-wide landscaped buffer is generally maintained where adjoining the proposed drive-through of Food and Drink Outlet 1, with the exception of a PMT to service the development site.
- The proposed change does not alter the approved operating hours or acoustic barriers.
- The addition of one (1) car parking space does not significantly increase the traffic generation.

c. *any pre-request response notice or response notice given in relation to the change application; and*

Response to Subsection 2(c)

A pre-request response was not requested and / or provided.

d. *if the responsible entity is, under section 78A(3), the Minister—all matters the Minister would or may assess against or have regard to, if the change application were a development application called in by the Minister; and*

Response to Subsection 2(d)

The responsible entity of this Change application is the assessment manager, being Council, not the Minister.

e. *if the responsible entity is, under section 78A(4)(a), the chief executive—all matters the chief executive would or may assess against or have regard to, if the change application were a development application declared to be an application for State facilitated development under section 106D; and*

Response to Subsection 2(e)

The responsible entity of this Change application is the assessment manager, being Council and not the Chief Executive.

f. *if paragraphs (d) and (e) do not apply—all matters the responsible entity would or may assess against or have regard to, if the change application were a development application; and*

Response to Subsection 2(f)

Further to the original assessment of the development application, where potentially new matters of assessment have been identified, this correspondence and supporting technical reports provide sufficient supporting information for Council to have regard to. Where relevant, consideration has been given to the proposed change against the relevant assessment benchmarks in the City Plan.

g. *another matter that the responsible entity considers relevant.*

Response to Subsection 2(e)

As above.

3. *Subsections (4) and (5) apply if the responsible entity must, in assessing the change application under subsection (2)(d), (e) or (f) consider –*
 - a. *A statutory instrument; or*
 - b. *Another document applied, adopted or incorporated (with or without changes) in a statutory instrument.*
4. *The responsible entity must consider the statutory instrument, or other document, as in effect when the development application for the development approval was properly made.*
5. *However, the responsible entity may give the weight the responsible entity considers is appropriate, in the circumstances, to –*
 - a. *The statutory instrument or other document as in effect when the change application was made; or*
 - b. *If the statutory instrument or other document is amended or replaced after the change application is made but before it is decided – the amended or replacement instrument or document; or*
 - c. *Another statutory instrument –*
 - i. *That comes into effect after the change application is made but before it is decided; and*
 - ii. *That the responsible entity would have been required to consider if the instrument had been in effect when the development application for the development approval was properly made.*

Response to Subsections 3, 4 and 5

The applicant has not identified any further statutory instruments or documents which would impact on Council's assessment of the application. The applicant welcomes Council's feedback in this regard and will provide any further information reasonably required and requested by Council to undertake its assessment.

7. Conclusion

In conclusion, the applicant advises:

- The proposed change to the Development Approval meets the definition of a 'minor change' as set out in Schedule 2 of the Planning Act and Schedule 1 of the DA Rules.
- The proposed change has been assessed against the relevant matters in Section 81(2) of the Planning Act, and based on the outcomes of this assessment, the Change application (minor) is recommended for approval.