

Change Application (Minor Change) Town Planning Assessment 103 Crosby Road, Albion

M E W I N G
P L A N N I N G
C O N S U L T A N T S

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RECEIVED
17/06/2026
APPLICATION REF
A007052198

1. Introduction

This town planning assessment is prepared in respect of a Change Application made to Brisbane City Council (the responsible entity) pursuant to section 78 of the *Planning Act 2016* (the **Planning Act**).

The Change Application comprises a Minor Change (as defined by Schedule 2 of the Planning Act), and accordingly must be assessed and decided pursuant to section 81 of the Planning Act.

The Change Application (Minor Change) relates to the existing development approval (Council Reference: A005364412) over the site at 103 Crosby Road, Albion comprising a Development Permit for Material Change of Use for Club, Indoor Sport and Recreation, Outdoor Sport and Recreation, Function Facility and Health Care Services granted by the Brisbane City Council on 21 April 2021. For further detail refer to the copy of the most recent development approval in **Attachment A**.

The Change Application (Minor Change) is made in accordance with the requirements for Change Applications pursuant to section 79 of the Planning Act, as it is made in the approved form and is accompanied by the written consent of the owner, and the required fee will be paid upon receipt of Council's fee quote to be issued following lodgement of the Change Application.

The original development application did not require a referral to the State Assessment and Referral Agency (SARA) or any other referral agency. The original application was subject to Impact Assessment procedures and was therefore subject to public notification pursuant to section 53 of the Planning Act.

2. Background

2.1 Site and Relevant Planning Designations

The site is located at 103 Crosby Road and is more properly described as part of Lot 1 on RP33562, Lot 1 on RP33563 and Lot 2 – 4 on RP33564. The site is 55,141m² and contains a number of facilities and amenities relating to the existing Brothers Rugby Club and facilities.

Having regard to the Certificate of Title (**Attachment B**) for the site, the registered owner of the site is Brisbane City Council

The site is not identified as benefitting from or being burdened by an easement or any other encumbrances.

The site is subject of the *Brisbane City Plan 2014 (v36.00/2026)* at the time of lodgement of the Change Application, pursuant to which the following key planning designations apply.

The following table also provides a comparison of the provisions applicable at the time of the current development approval (subject to *v17/2019 of Brisbane City Plan 2014*). As set out in **Table 1**, there have been no change in designations between the planning framework applicable to the current approval and the planning framework applicable to this planning application.

Table 1 – Town Planning Designations

	City Plan (v.17.00/2019) Original Approval	City Plan (v.36.00/2026) Current City Plan
Zone	Sport and Recreation (Local) Zone Sport and Recreation (District) Zone Sport and Recreation (Metropolitan) Zone	Sport and Recreation (Local) Zone Sport and Recreation (District) Zone Sport and Recreation (Metropolitan) Zone
Neighbourhood Plan	Albion Neighbourhood Plan	Albion Neighbourhood Plan
Overlays	<ul style="list-style-type: none"> • Airport Environs Overlay <ul style="list-style-type: none"> ○ OLS – Horizontal Limitation Surface Boundary ○ PANS – Procedures for Air Navigation Surfaces ○ BBS Zone – Distance from Airport 3-8km • Bicycle Network Overlay <ul style="list-style-type: none"> ○ Secondary Cycle Route (Crosby Road) ○ Local Cycle Route (southern and western boundaries) • Biodiversity Overlay <ul style="list-style-type: none"> ○ Matters of state environmental significance (MSES) sub-category • Coastal Hazard Overlay <ul style="list-style-type: none"> ○ Medium storm-tide inundation area sub-category • Community Purposes Network Overlay [no requirements] • Critical Infrastructure and Movement Network [no requirements] • Flood Hazard <ul style="list-style-type: none"> ○ Brisbane River flood planning area 4 sub-category ○ Brisbane River flood planning area 5 sub-category ○ Creek/waterway flood planning area 2 sub-category ○ Creek/waterway flood planning area 3 sub-category ○ Creek/waterway flood planning area 4 sub-category ○ Creek/waterway flood planning area 5 sub-category ○ Overland flow flood planning area sub-category • Heritage Overlay 	<ul style="list-style-type: none"> • Airport Environs Overlay <ul style="list-style-type: none"> ○ OLS – Horizontal Limitation Surface Boundary ○ PANS – Procedures for Air Navigation Surfaces ○ BBS Zone – Distance from Airport 3-8km • Bicycle Network Overlay <ul style="list-style-type: none"> ○ Secondary Cycle Route (Crosby Road) ○ Local Cycle Route (southern and western boundaries) • Biodiversity Overlay <ul style="list-style-type: none"> ○ Matters of state environmental significance (MSES) sub-category • Coastal Hazard Overlay <ul style="list-style-type: none"> ○ Medium storm-tide inundation area sub-category • Community Purposes Network Overlay [no requirements] • Critical Infrastructure and Movement Network [no requirements] • Flood Hazard <ul style="list-style-type: none"> ○ Brisbane River flood planning area 3 sub-category ○ Brisbane River flood planning area 4 sub-category ○ Brisbane River flood planning area 5 sub-category ○ Creek/waterway flood planning area 4 sub-category ○ Creek/waterway flood planning area 5 sub-category ○ Overland flow flood planning area sub-category • Heritage Overlay <ul style="list-style-type: none"> ○ Area adjoining heritage sub-category • Industrial Amenity Overlay

Table 1 – Town Planning Designations

	City Plan (v.17.00/2019) Original Approval	City Plan (v.36.00/2026) Current City Plan
	<ul style="list-style-type: none"> ○ Area adjoining heritage sub-category • Industrial Amenity Overlay <ul style="list-style-type: none"> ○ Industrial Amenity Investigation Area sub - category • Potential and Actual Acid Sulfate Soils Overlay <ul style="list-style-type: none"> ○ Potential and actual acid sulfate soils sub-category ○ Land at or below 5m AHD sub-category ○ Land above 5m AHD and below 20m AHD sub-category • Road Hierarchy Overlay <ul style="list-style-type: none"> ○ District Road (Crosby Road and Royal Terrace) ○ Suburban Road (Fox Street and Felix Street) • Streetscape Hierarchy Overlay <ul style="list-style-type: none"> ○ Neighbourhood Street Minor (Fox Street, Crosby Road and Royal Terrace) ○ Industrial Street (Greg Chappell Street) 	<ul style="list-style-type: none"> ○ Industrial Amenity Investigation Area sub - category • Potential and Actual Acid Sulfate Soils Overlay <ul style="list-style-type: none"> ○ Potential and actual acid sulfate soils sub-category ○ Land at or below 5m AHD sub-category ○ Land above 5m AHD and below 20m AHD sub-category • Road Hierarchy Overlay <ul style="list-style-type: none"> ○ District Road (Crosby Road and Royal Terrace) ○ Suburban Road (Fox Street and Felix Street) • Streetscape Hierarchy Overlay <ul style="list-style-type: none"> ○ Neighbourhood Street Minor (Fox Street, Crosby Road and Royal Terrace) ○ Industrial Street (Greg Chappell Street)
State designations	<ul style="list-style-type: none"> • SEQ Regional Plan land use categories <ul style="list-style-type: none"> ○ Urban Footprint • Coastal Protection <ul style="list-style-type: none"> ○ Coastal area – medium storm tide inundation area • Water resources <ul style="list-style-type: none"> ○ Water resource planning area boundaries 	<ul style="list-style-type: none"> • SEQ Regional Plan land use categories <ul style="list-style-type: none"> ○ Urban Footprint • Coastal Protection <ul style="list-style-type: none"> ○ Coastal area – medium storm tide inundation area • Water resources • Water resource planning area boundaries

2.2 Planning Designations updates

Having regard to the identified designations, the application of the Creek/Waterway flood planning subcategory and the Brisbane River/Flood Planning subcategories of the Flood Overlay over the site has been updated since the original approval. In particular, as identified below the severity of the Creek/Waterway Flood Subcategory has changed under the current proposal. The revisions to the Flood Mapping do not affect the proposed changes. Refer to the enclosed Engineering Technical Memo for further details.

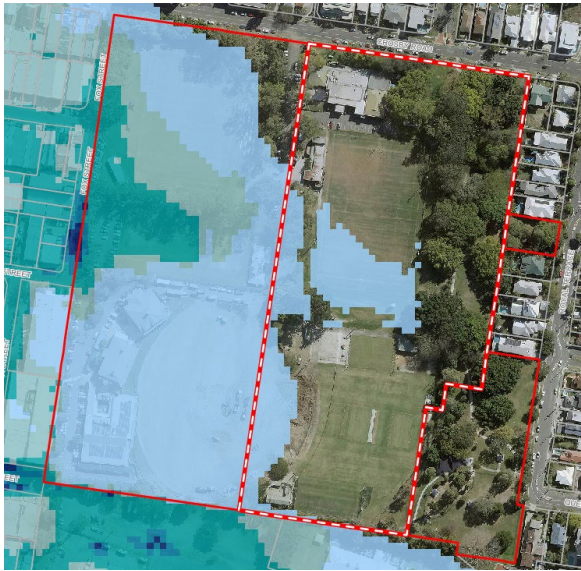


Figure 1 - Existing Approval - Brisbane River
Source: BCC 2026



Figure 2 - Existing Approval - Creek/Waterway
Source: BCC 2026



Figure 3 - Proposed Development - Brisbane River
Source: BCC 2026



Figure 4 - Proposed Development - Creek/Waterway
Source: BCC 2026

2.3 Approval Background

This Change Application relates to the current development approval (Council Reference: A005364412) over the site, which comprises a Development Permit for Material Change of Use for Club, Indoor Sport and Recreation, Outdoor Sport and Recreation, Function Facility and Health Care Services which was granted by Brisbane City Council on 23 April 2021.

The approved development is for the redevelopment of Brothers Rugby Club and supporting facilities. The development involved the demolition of the existing facilities on site and the construction of upgraded club facilities with the additional tenancies to the north and south of the main field. The approved development involves the following scope of works:

- Stage 1: Fieldworks

- Stage 2: Indoor Sport and Recreation (Aquatic Achievers Swim School) and Outdoor Sport and Recreation;
- Stage 3: Club (redevelopment of Brothers Rugby Clubhouse);
- Stage 4: Club, Function Facility and Outdoor Sport and Recreation; and
- Stage 5: Health Care Service and Indoor Sport and Recreation.

A number of development permits were obtained in relation to the above scope of development.

The key development parameters of the approved development are identified below:

Table 2: Approved Development	
Use and Yield	Club Indoor Sport and Recreation Outdoor Sport and Recreation Function Facility Health Care Services
Vehicle Access	Crosby Road
Car Parking	127 (as per conditions of approval)
Height	Two (2) storeys

Figure 1 and Figure 2 illustrates the approved development outcome over the site:

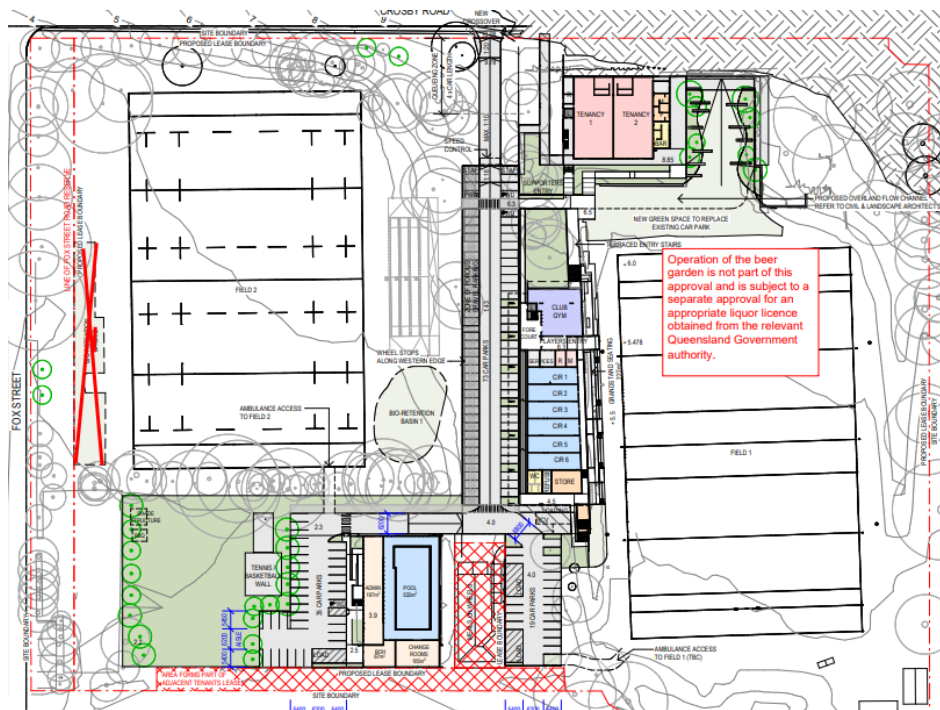


Figure 1: Approved Site Layout – Lower level (Council REF: A005364412) (Source: Bureau Proberts 2021)

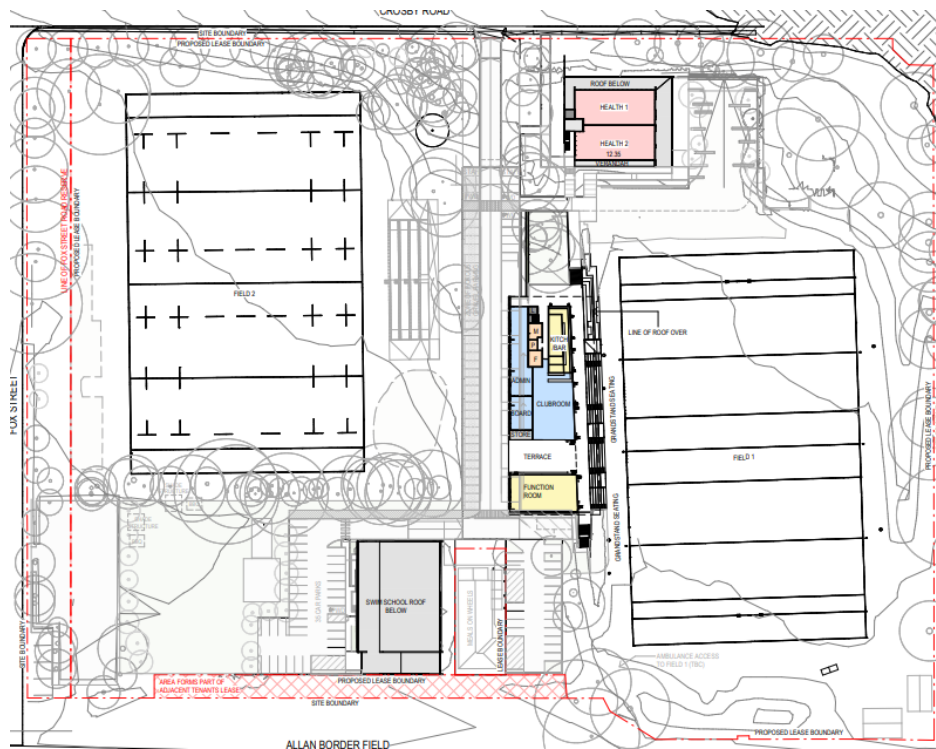


Figure 2: Approved Site Layout – Upper level (Council REF: A005364412) (Source: Bureau Proberts 2021)

3. Proposed Changes

The Applicant proposes to change the development approval (Council Ref: A005364412) as a consequence of further operational and functionality considerations and updated financial costings. Brothers Rugby Club is a community club, for which financial resourcing is limited. As such, managing the staging and deliverability of the outcome to enable the club to achieve initial aspects in a financially responsible way is of utmost importance. Further, the Club has recently been notified of a grant that will assist its club facilities to be built, but which comes with particular timeframe requirements, meaning that the focus on delivering the club facilities is time critical.

There are two main aspects to the change, being some design amendments to the club facilities (approved to be delivered in stage 3 of the approval) and in conjunction the delivery of the club facilities as stage 1.

Club Facilities and Design

The proposed concept involves a reconfiguration and targeted upgrade of the approved clubhouse facilities across both ground and first floor levels. While the concept design reflects a reconfiguration of built form and internal spaces, the proposal does not result in a material increase in the overall scale or intensity of the approved development, with the clubhouse facilities continuing to support the club's rugby operations and maintain a direct interface with the rugby fields.

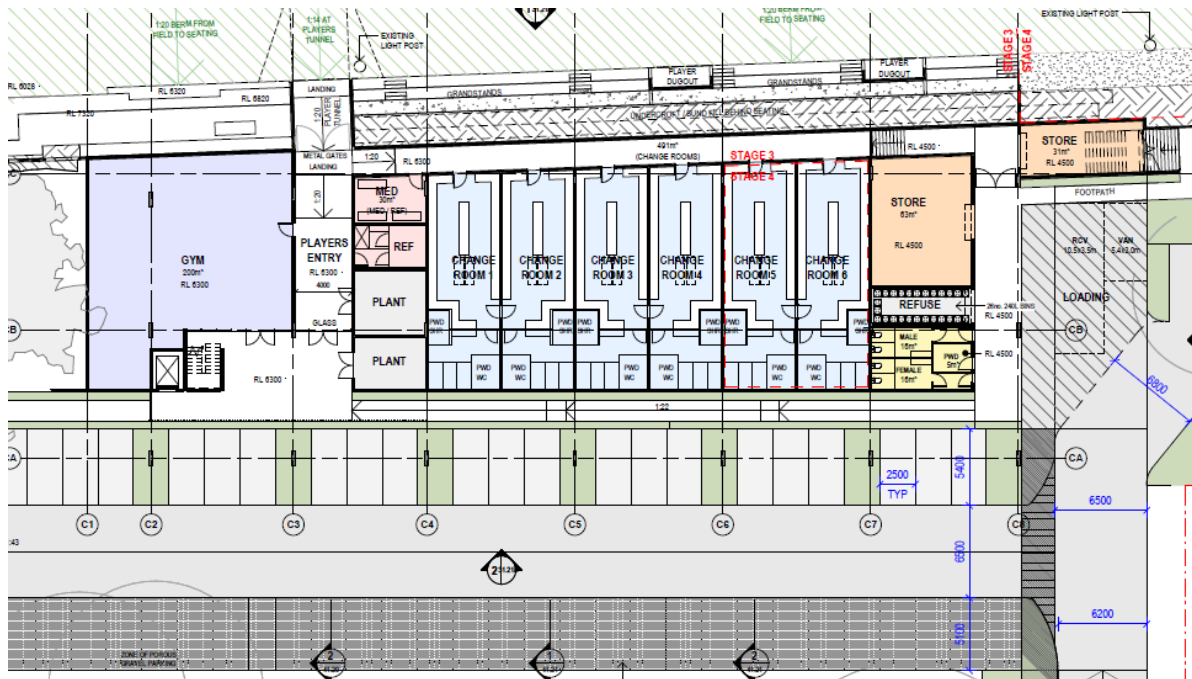
The changes are instead directed toward improving the functionality, efficiency and usability of the approved facilities, including enhanced player amenities, improved circulation and back-of-house areas, and refinements to the layout of club and function spaces. These adjustments respond to operational requirements identified through ongoing design development and are intended to support the day-to-day operation of the club. In this regard, the proposal does not introduce new

uses or increase the scale or intensity of activity on the site. The development continues to operate as a community-focused sports club, with the anticipated level of patronage and demand remaining consistent with the approved scheme.

The proposed changes to the clubhouse is itemised below:

Reconfiguration of Ground Floor Layout

- Rationalisation and upgrade of player amenities, including change rooms, gym and associated support spaces
- Improved internal circulation and functional relationships between facilities
- Refinement of back-of-house areas, including storage and service spaces
- Provision of undercroft to improve overland flow outcomes.



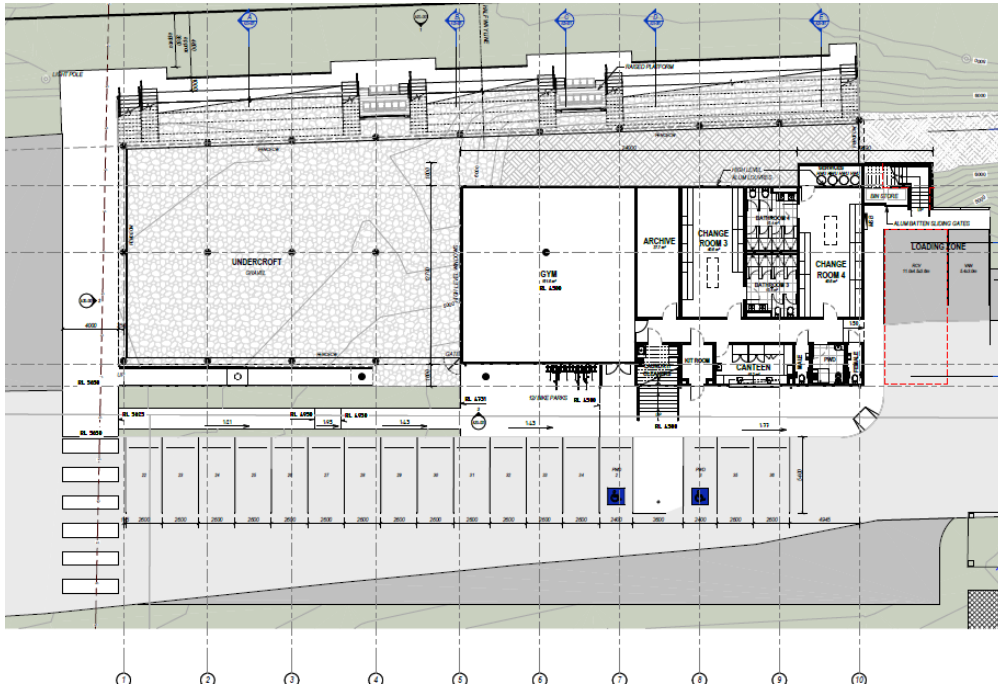
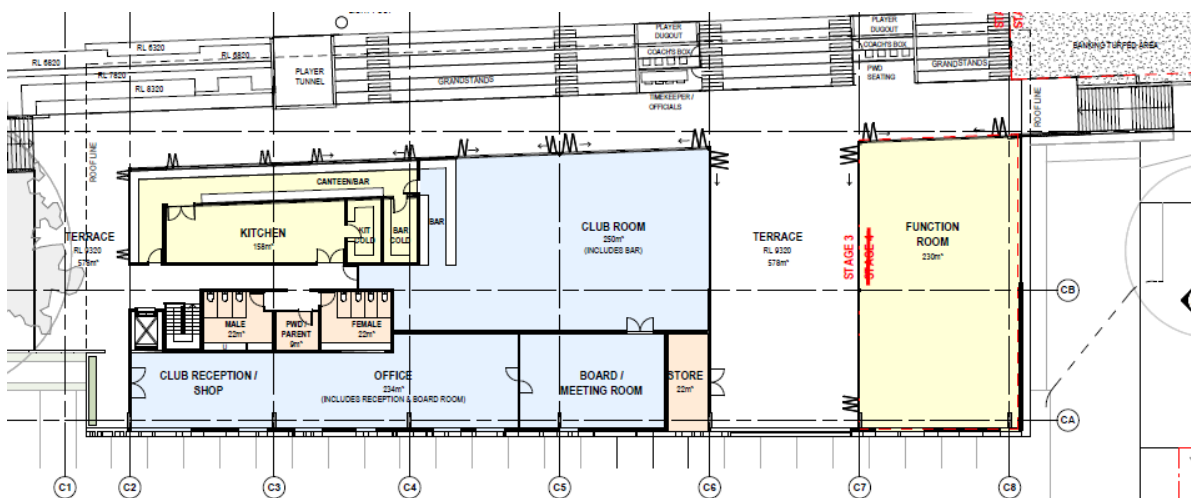


Figure 3 – Approved (top) and Proposed (bottom): Ground Floor Plan

Reconfiguration of First Floor Layout

- Replanning of clubroom and function spaces to improve flexibility and usability
- Upgrades to bar and kitchen facilities to support more efficient operation
- Improved internal layout to facilitate better patron movement
- Relocation of some change rooms to this level



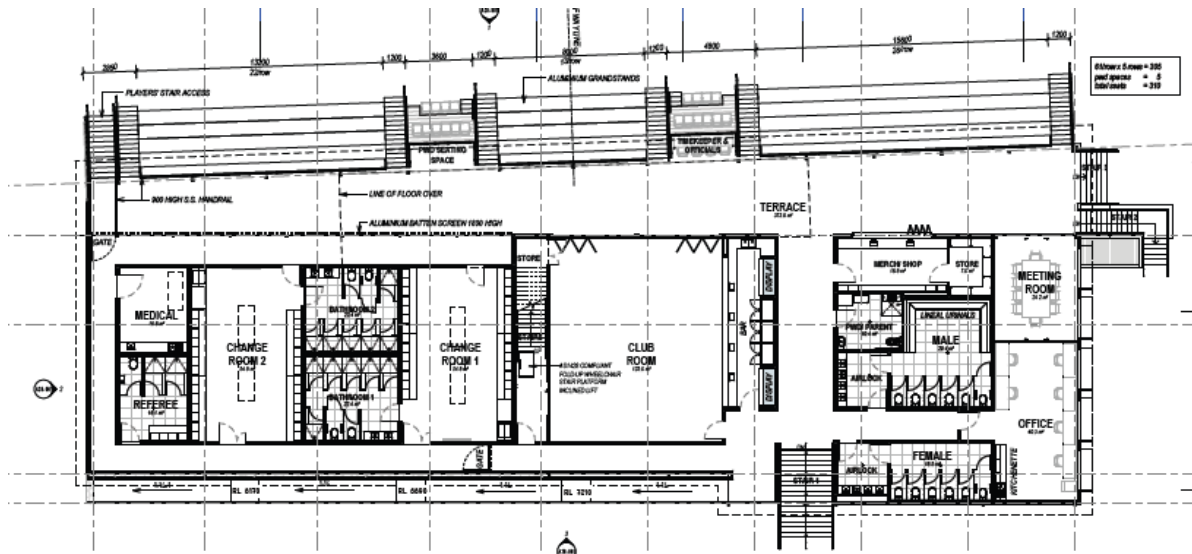


Figure 4 – Approved (top) and Proposed (bottom): First Floor Plan

Introduction of Second Floor Area

- Inclusion of additional floor area within the upper level of the clubhouse
- Space to be used for ancillary club-related purposes.
- Designed to integrate with the existing built form and remain consistent with the general approved height and building envelope
- Does not facilitate an increase in patron capacity or change the established use of the site

Relevantly, the gross floor area of the club facilities is reduced from that currently approved, reducing from 1769m² (as taken from Council’s Infrastructure Charges Notice) to 1,459m², meaning there is no increase in demand or impacts.

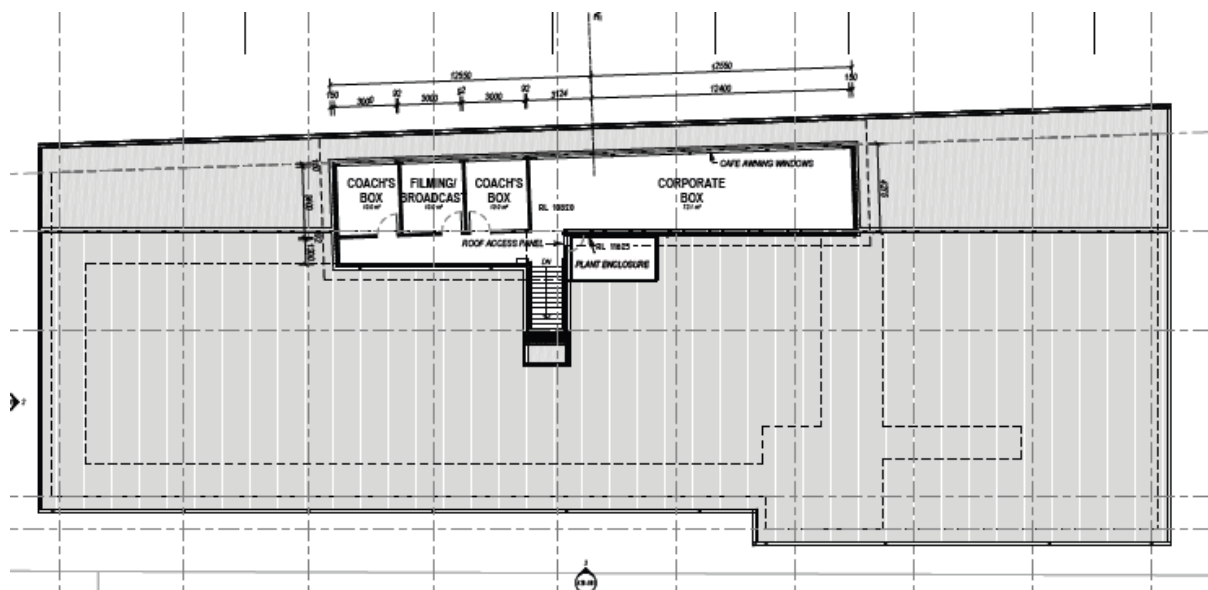


Figure 5 – Proposed Second Floor Plan (Source: Rohrig Constructions 2026)

Staging

The Applicant proposes to deliver the proposed club facility changes within a revised Stage 1 of the development (under the previous approval the club facility works were approved in Stage 3). This approach enables the upgraded clubhouse facilities to be delivered early, providing immediate operational and functional benefits to the club while maintaining continuity of use across the site.

The sequencing of subsequent stages is otherwise to remain as per the approval. Notwithstanding, the ultimate built form and land use outcomes remain consistent with the approved master plan, with the current proposal not altering the overall development intent or yield.

Figure 5 below is a proposed staging plan which identifies the proposed extent of Stage 1 in the context of the approved master plan and reallocation of staging outcomes and the reallocation of staging outcomes. **Figure 6** below identifies the previously approved Staging Plan.

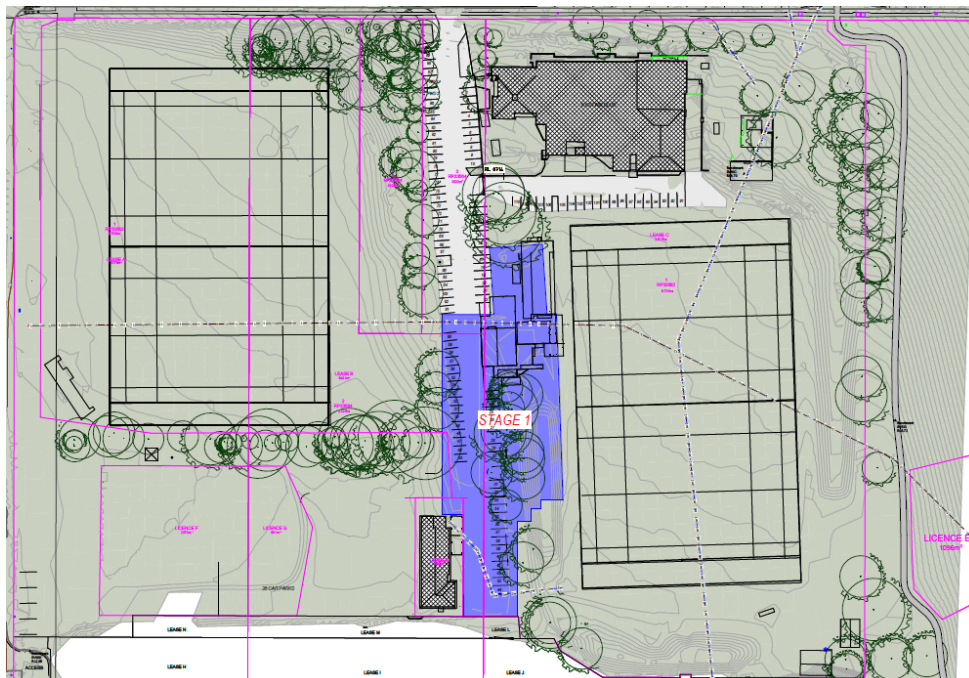


Figure 5 Indicative Extent of Revised Stage 1 Works (Source: Rohrig Constructions 2026)

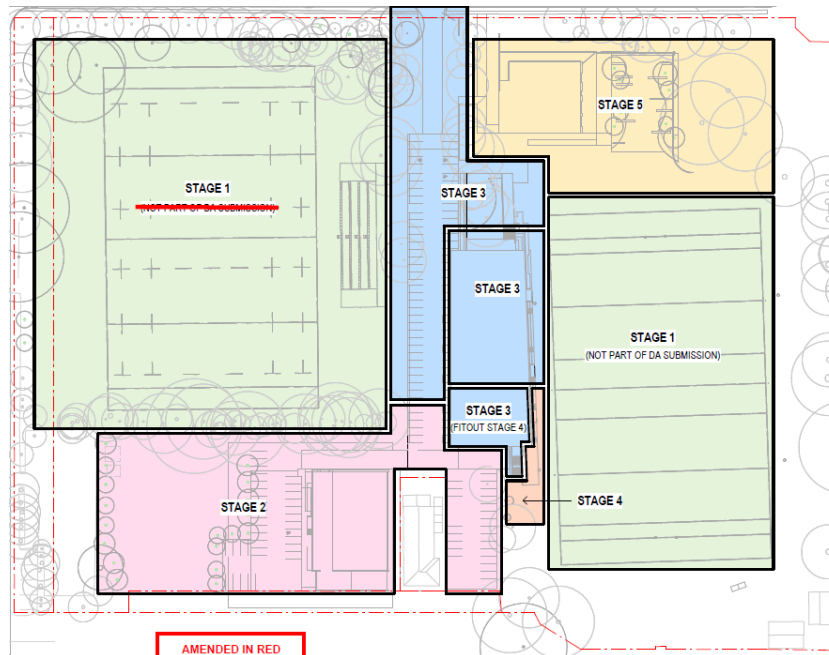


Figure 6 – Previous Approved Staging Plan Layout (Source: Rohrig Constructions 2026)

The proposed updated staging arrangement is as follows:

- Stage 1: Club
- Stage 2: Fieldworks
- Stage 3: Indoor Sport and Recreation (Aquatic Achievers Swim School) and Outdoor Sport and Recreation;
- Stage 4: Club (as it relates to the delivery of the balance of the car parking only);
- Stage 5: Club, Function Facility and Outdoor Sport and Recreation; and
- Stage 6: Health Care Service and Indoor Sport and Recreation.

Car Parking Provision

Regarding car parking, the site currently accommodates a total of 113 on-site car parking spaces. The proposed development has been specifically designed to ensure that this level of parking provision can be maintained throughout the development process via interim arrangements across the site. As such, the proposed amended development continues to provide 113 on-site car parks with proposed Stage 1. Given that the car parking will only provide for the club facilities in Stage 1, and the capacity of the club facilities is commensurate with the current operation of the site (as it provides club facilities for the same capacity of the rugby fields, which generates the substantive attraction to the site), then there is no change in parking demand from that existing.

The provision of a consistent number of cars in Stage 1 (with that existing) is achieved through some modest augmentation to the car parking areas, as shown on the proposal plans.

This approach ensures there is no net reduction in parking supply during the delivery of the development and that the site is able to continue to operate in a manner consistent with existing and approved conditions. In this regard, the Stage 1 parking arrangements are aligned with the

unchanged operational profile of the development, with no increase in demand as a result of the proposed works.

Car Parking – Ultimate Delivery

The car parking provision is otherwise to be expanded to be consistent with the approval for future stages, when those stages are delivered (associated with increased visitation demands). Specifically, upon the completion of Stage 3 the development will have an ultimate car parking provision of 148 car parks (including 7 tandem and 6 PWD) and one (1) van.

Upon the completion of the Stage 6 Works (relating to the Health Care Service and new green space area) the development will provide a total of 127 car parks, (aligning with the current development approval and the overall anticipated demand.).

Stormwater

The approved development is supported by a Site Based Stormwater Management Plan, which demonstrated compliance with the State Planning Policy stormwater management design objectives via MUSIC modelling and a bioretention-based treatment train. The approved stormwater quality treatment train will be delivered in stages after Stage 1 of the development, in line with the original approval, and the lawful point of discharge arrangements are unchanged.

The proposed change comprises the replacement of the existing clubhouse and the reconfiguration and modest expansion of existing car parking within the established club precinct. Assessed on its own footprint, the change results in a small net increase in impervious area — below the 2,500 m² threshold that underpins the SPP water quality assessment benchmarks. On that basis, we consider that the change itself does not engage the SPP stormwater quality design objectives, and that requiring updated MUSIC modelling for a minor change of this scale, on a community sport and recreation facility, would go beyond what the SPP intends.

Accordingly, it is proposed to utilise the existing approved SBSMP, with the approved treatment train to be delivered in the future stages as contemplated by the approval, and stormwater quality for the new works managed through best-practice erosion and sediment control secured by conditions at operational works. Refer to the Engineering Technical Memo (**Attachment E**).

Tree Retention

As identified on the proposed Tree Removal Plan drawing A01-005 Issue 2, a revised tree removal concept is proposed, which involves an overall reduced quantity of mature trees for removal. A total of 24 major trees were approved for removal as part of the original application. Under the proposed development, only 14 major trees are proposed to be removed, equating to the retention of 10 mature trees throughout the site.

The revised tree removal outcome reflects refinements to the approved development footprint and staging approach and represents an improved landscaping and vegetation retention outcome when compared with the existing approval. Accordingly, the proposal does not increase impacts on established vegetation and instead provides for greater retention of mature canopy trees across the site.

Adjoining Heritage Place

The subject site adjoins a Local Heritage Place on the eastern side, at 19 Royal Terrace, Albion known as Bromley House (former). The Local Heritage Place is a dwelling house and an original Federation-style residence constructed circa 1908 for a family who played a significant role in the development of the painting and paint manufacturing industry in Brisbane.

The proposed changes do not involve any works to the adjoining heritage place and the works are limited to a reconfiguration and refinement of the already approved clubhouse facilities, which are located approximately 140 metres west of the Local Heritage Place. Importantly, the proposal does not materially alter the approved height, scale or overall built form outcome, as relevant to the assessment of the adjoining heritage place, with the clubhouse maintaining a generally consistent presentation to that already approved by Council. The balance of the proposed works under the development approval will remain as approved. Further, the proposed clubhouse is separated by in excess of 140m from the Local Heritage Place, and the development will therefore not visually detract from, dominate or diminish the heritage significance or setting of the adjoining Local Heritage Place.

4. Changes to Approval Documentation

As part of this Change Application, we endeavour to assist Council with relevant process matters to the greatest extent possible. In this regard, we have identified where the Change Application will result in amendments to the current Brisbane City Council approval package, including the approved drawings and documents, conditions of approval, and infrastructure charges notices.

4.1 Changes to Approved Drawings and Documents

We recommend that the following changes are made to the approved drawings and documents (existing documents to be removed in strikethrough, and replacement documents in **green**). Only the documents subject of change are identified below; all other approved documents are unchanged.

Table 2 – Changes to Approved Drawings and Documents		
Reference Number	Description & Revision No.	Date
Approved Plans		
Acid Sulfate Soil Investigation	97309.00.L.001.Rev 1	20-DEC-2019 (Received)
Tree Survey	TS466	16-OCT-2020 (Received)
Landscape Concept Plan	DA05 191101 (Amended In Red 26-MAR-2021)	01-OCT-2020
Site Layout - Lower Level	10.10 Rev 26 (Amended In Red 21-APR-2021)	23-FEB-2021 (Received) Amended in Red
Site Layout - Upper Level	10.11 Rev 26	23-FEB-2021 (Received) Amended in Red
Tree Retention Plan	10.20 Rev 11	23-FEB-2021 (Received)
Staging Plan	10.30 Rev 9 (Amended In Red 25-MAR-2021)	23-FEB-2021 (Received) Amended in Red
Precinct Plan - Swim School Ground	20.10 Rev 18	23-FEB-2021 (Received)
Precinct Plan - Swim School Roof	20.11 Rev 16	23-FEB-2021 (Received)
Precinct Plan - Club Ground	20.20 Rev 15	23-FEB-2021 (Received)
Precinct Plan - Club Level 1	20.21 Rev 15 (Amended In Red 25-MAR-2021)	23-FEB-2021 (Received)
Precinct Plan - Club Roof	20.22 Rev 14 (Amended In Red 25-MAR-2021)	23-FEB-2021 (Received)

Table 2 – Changes to Approved Drawings and Documents		
Reference Number	Description & Revision No.	Date
Precinct Plan - Com Ground	20.30 Rev 14 (Amended In Red 21-APR-2021)	23-FEB-2021 (Received)
Precinct Plan - Com Level 1	20.31 Rev 14	23-FEB-2021 (Received)
Precinct Plan - Com Roof	20.32 Rev 13	23-FEB-2021 (Received)
Site Elevations - Crosby Road (Part 1)	30.00 Rev 12	23-FEB-2021 (Received)
Site Elevations - Crosby Road (Part 2)	30.01 Rev 11	23-FEB-2021 (Received)
Site Elevations - Fox Street (Part 1)	30.02 Rev 12	23-FEB-2021 (Received) Amended in Red
Site Elevations - Fox Street (Part 2)	30.03 Rev 11	23-FEB-2021 (Received) Amended in Red
Precinct Elevations - Swim School North/South	31.10 Rev 17	23-FEB-2021 (Received)
Precinct Elevations - Swim School East/West	31.11 Rev 17	23-FEB-2021 (Received)
Precinct Elevations – Club North/South – Stage 3	31.20A Rev 6	23-FEB-2021 (Received)
Precinct Elevations – Club North/South – Stage 4	31.20B Rev 14	23-FEB-2021 (Received)
Precinct Elevations – Club East/West – Stage 3	31.21A Rev 6	23-FEB-2021 (Received)
Precinct Elevations – Club East/West – Stage 4	31.21B Rev 14	23-FEB-2021 (Received)
Precinct Elevations – Com North/South	31.30 Rev 14	23-FEB-2021 (Received)
Precinct Elevations – Com East/West	31.31 Rev 14	23-FEB-2021 (Received)
Site Sections - Driveway	40.10 Rev 11	23-FEB-2021 (Received) Amended in Red
Precinct Sections - Swim School	41.10 Rev 16	23-FEB-2021 (Received)
Precinct Sections – Club	41.20 Rev 13	23-FEB-2021 (Received)
Precinct Sections – Club	41.21 Rev 13	23-FEB-2021 (Received)
Precinct Sections - Commercial	41.30 Rev 12	23-DEC-2021 (Received)
Proposed Alternative Concept	C-DA-620 Rev F (Amended In Red 25-MAR-2021)	24-MAR-2021 (Received)
Preliminary Stormwater Basin 1 Sections	C-DA-640 Rev A (Amended In Red 25-MAR-2021)	24-MAR-2021 (Received)
Preliminary Stormwater Basin Sections	C-DA-641 Rev A (Amended In Red 25-MAR-2021)	24-MAR-2021 (Received)
Location Siting Plan	A01-00 1 Issue 2	8 June 2026
Proposed Site Plan	A01-002 Issue 2	8 June 2026
Future Parking Layout	A01-003 Issue 2	8 June 2026
Tree Removal	A01-005 Issue 2	8 June 2026
Staging Plan – Stage 1	A01-010 Issue 2	8 June 2026
Staging Plan Future	A01-011 Issue 2	8 June 2026

General Arrangement Plan – Ground Floor	A10-001 Issue 2	8 June 2026
General Arrangement Plan – First Floor	A10-002 Issue 2	8 June 2026
Roof Plan	A15-001 Issue 2	8 June 2026
Elevations	A20-001 Issue 2	8 June 2026
Building Sections	A25-001 Issue 2	8 June 2026
Building Sections	A25-002 Issue 2	8 June 2026
Engineering Tech Memo		11 June 2026

4.2 Changes to Conditions of Approval

As a consequence of the proposed staging amendments, it is requested that Council appropriately re-order conditions of approval (where relevant) as per the updated staging approach.

In addition to the above, as a consequence of the amended delivery of car parking across Stages 1 Stage 3 and Stage 5, it is recommended to provide a new Car Parking, Access and Manoeuvring Condition which accords with the following:

Stage 1 New Proposed Condition:

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

Construct and maintain access, parking and manoeuvring for vehicles on site in accordance with the relevant Brisbane Planning Scheme Codes, as indicated on the approved DRAWINGS AND DOCUMENTS, including the following:

.....

- i. Parking on the site for 113 cars, including 2 X parking spaces for people with disabilities and for the loading and unloading of vehicle(s) within the site.

.....

Stage 2 New Proposed Condition:

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

Construct and maintain access, parking and manoeuvring for vehicles on site in accordance with the relevant Brisbane Planning Scheme Codes, as indicated on the approved DRAWINGS AND DOCUMENTS, including the following:

.....

- ii. Parking on the site for 148 cars and one (1) van (including 6x PWD and 7x Tandem car park) and for the loading and unloading of vehicle(s) within the site.

.....

Stage 5 New Proposed Condition:

Construct and maintain access, parking and manoeuvring for vehicles on site in accordance with the relevant Brisbane Planning Scheme Codes, as indicated on the approved DRAWINGS AND DOCUMENTS, including the following:

.....

- i. Ultimate Parking on the site for 127 an (including 4x PWD) and for the loading and unloading of vehicle(s) within the site.

.....

The proposed Stage 1 Conditions should otherwise reflect the current Stage 3 Conditions, with removal of Conditions 86, 94, 97, 101, 102.

4.3 Changes to Infrastructure Charges Notice

Based on Council’s Adopted Infrastructure Charges Resolution (No.14) 2025 the following demand and credit units for the Local Government Adopted charges are identified as being changes, as a result of this change application.

Pursuant to Section 119 of the Planning Act if an approval is given for a Change Application for which an infrastructure charges notice has been given, the local government may give an amended infrastructure charges notice. However, the amended infrastructure charges notice may only relate to the change to the development approval.

In terms of the proposed development, the infrastructure charges relating to the previously approved Club component (formerly Stage 3) require amendment to reflect the revised staging sequence proposed as part of this Change Application. Specifically, the Club is now proposed to be delivered as part of Stage 1, rather than Stage 3 as originally contemplated under the development approval. As such, it is appropriate that the infrastructure charges notice be amended to align with the revised staging and timing of development delivery.

Further, the proposed clubhouse facilities comprise a refined development outcome with a reduced gross floor area when compared to that previously approved. In this regard, the amended infrastructure charges calculation appropriately reflects the revised development demand associated with the proposal.

Table 3: Stage 1 – Revised Infrastructure Charges Calculation					
Use	Demand unit	\$ per Demand Unit	Development Demand	Demand Credit	Extra Demand
Proposed – Extra demand (in addition to the above approved)					
Club	GFA (m ²)	\$44.19	4384 1,459.1	688	693 771.1
Function Facility	GFA (m ²)		388	0	388
Stormwater impervious area	Impervious area (m ²)	\$12.87	3418	3238	180
Total Charge					\$36,391.6

It is recommended to revise the Infrastructure Charges notices for the balance of the stages, to align with the latest proposed delivery of the overall Brothers Rugby Redevelopment.

4 Statutory Town Planning Framework

This section of our Town Planning Assessment identifies the applicable components of the statutory town planning framework relating to a Change Application, specifically for a Minor Change to an existing development approval, and their relevance to the changes proposed by the Applicant.

Chapter 3, Part 5, Subdivision 2 of the Planning Act sets out the procedure for making a change application. In particular, section 78 states:

- (1) *A person may make an application (a change application) to change a development approval.*
- (2) *A change application must be made to the responsible entity.*

Section 78A identifies who the responsible entity for a change application:

- (3) *The responsible entity for a change application is—*
 - (a) *if the change application is for a minor change to a development condition of a development approval stated in a referral agency’s response for the development application or another change application for the approval—the referral agency; or*
 - (b) *otherwise—the assessment manager. ...”*

We understand that Brisbane City Council, as the assessment manager for the original application to which the approval relates, is the responsible entity in this instance for the purposes of section 78A of the Planning Act.

A change application under section 78 of the Planning Act may be for a ‘minor change’, which is defined in schedule 2 of the Planning Act as follows:

minor change means a change that—

- (a) *for a development application—*
 - (i) *does not result in substantially different development; and*
 - (ii) *if the application, including the change, were made when the change is made—would not cause—*
 - (A) *the inclusion of prohibited development in the application; or*
 - (B) *referral to a referral agency if there were no referral agencies for the development application; or*
 - (C) *referral to extra referral agencies; 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; or*
- (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.”*

Schedule 1 of the Development Assessment Rules sets out the circumstances in which a minor change would not result in substantially different development.

Section 81 of the Planning Act prescribes the matters which the responsible entity must have regard to in assessing the request as follows:

- (1) *This section applies to a change application for a minor change to a development approval.*
- (2) *In assessing the change application, the responsible entity must consider—*
 - (a) *the information the applicant included with the application; and*
 - (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*
 - (c) *any pre-request response notice or response notice given in relation to the change application; and*
 - (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*
 - (da) *if paragraph (d) does 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*
 - (e) *another matter that the responsible entity considers relevant.*
- (3) *Subsections (4) and (5) apply if the responsible entity must, in assessing the change application under subsection (2)(d) or (da), 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.”*

An assessment of the proposed changes against the ‘minor change’ definition, Schedule 1 of the Development Assessment Rules (substantially different development criteria) and Section 81 of the Planning Act is included below as part of this town planning assessment.

Minor Change Statutory Assessment

4.1 Assessment against Minor Change Criteria

The following table provides an assessment against the minor change criteria as identified in the definition for minor change stated in Schedule 2 of the Planning Act.

Table 4 – Assessment of Minor Change Criteria	
Minor Change Criteria	Assessment
Does not result in substantially different development	Refer to Table 5 .
Would not cause the inclusion of prohibited development	The proposed changes would not introduce or involve any prohibited development.
Would not cause referral to a referral agency if there were no referral agencies for the development application	The original development application did not trigger a referral to the State Assessment Referral Agency.
Would not cause referral to extra referral agencies	The proposed changes would not cause referral to a new referral agency.
Would not cause a referral agency to assess the application against matters prescribed by regulation under section 55(2), other than matters the referral agency must have assessed the application against when the application was made	
Would not cause public notification if public notification was not required for the development application	The original application triggered Impact assessment and therefore required public notification. If the application were to be relogged under the current framework, the application would continue to be Impact Assessable.

The following table provides an assessment against the guidelines for substantially different development as identified in Schedule 1 of the Development Assessment Rules.

Table 5 – Assessment of Substantially Different Development Criteria	
Minor Change Criteria	Assessment
Does not involve a new use	The proposed minor change does not introduce a new use
Does not result in the application applying to a new parcel of land	The proposal continues to apply over the land to which the original development application and approval applies.
Does not dramatically change the built form in terms of bulk, scale and appearance	The proposed change will not dramatically change the built form, scale or appearance of the approved development for the reasons set out below. <ul style="list-style-type: none"> • The overall building composition, bulk, scale and architectural expression of the approved clubhouse remains generally consistent with the existing approval. While refinements to the building layout and configuration are proposed, the development continues to present as a clubhouse facility directly associated with the established sporting use of the site. • The proposal maintains the approved development intent, with changes primarily

Table 5 – Assessment of Substantially Different Development Criteria

Minor Change Criteria	Assessment
	<p>directed toward improved functionality, operational efficiency and deliverability of the club facilities, rather than a material increase in the scale or intensity of development.</p> <ul style="list-style-type: none"> • The key architectural expression of the approved clubhouse is retained, including its direct interface and relationship with the adjoining rugby fields, spectator areas and club operations. The changes instead represent an evolution of the approved design to better support the day-to-day operation of the club. • The development does not result in a material increase in building bulk or scale. While a modest second floor component is proposed, this is limited in extent, integrated into the overall building form, and remains consistent with the approved building height and broader built form outcome anticipated by Council. Additionally, the overall GFA is proposed to be reduced as a result of the ground floor and first floor level changes. • The proposed amendments do not introduce a new use or materially alter the function of the approved development. The clubhouse continues to operate as a community-focused sporting facility, with no material increase in patronage, activity or demand anticipated. • The proposed staging approach consolidates the revised clubhouse facilities into Stage 1 to support operational continuity and financial deliverability. This change does not alter the ultimate approved master plan outcome, with subsequent stages remaining generally consistent with the approved development framework, including the ultimate delivery of car parking, • The proposed interim car parking arrangements maintain the existing parking supply available to the site and are aligned with the unchanged operational profile of the development. No changes are proposed to site access arrangements. • The proposal does not alter the approved building height and does not introduce any significant changes to the visual presentation of the development when viewed from surrounding road frontages or adjoining land. <p>The proposed changes therefore maintain a consistent overall built form and design outcome and do not result in substantially different development.</p>
Does not change the ability of the approved development to operate as intended	<p>The proposed change will not alter the ability of the approved development to operate as intended for the reasons set out below.</p> <ul style="list-style-type: none"> • The approved use of the site as a community-focused sporting and recreation facility remains

Table 5 – Assessment of Substantially Different Development Criteria

Minor Change Criteria	Assessment
	<p>unchanged, with no new land uses proposed as part of the development.</p> <ul style="list-style-type: none"> • The proposed amendments are directed toward improving the functionality, efficiency and usability of the approved clubhouse facilities, including upgraded player amenities, refined club and function spaces, improved circulation and enhanced operational support areas. • The proposal does not materially alter the anticipated level of patronage, activity or operational demand associated with the approved development. The site will continue to function in a manner generally consistent with that already contemplated by Council under the existing approval. • The revised staging approach has been developed to maintain continuity of club operations throughout construction, including interim arrangements that retain the existing parking supply and functionality of the site. the revised staging allows the club developments to be delivered early, which will ensure optimal operational functionality. • While internal layouts and some built form elements are refined, the proposal maintains the essential operational relationship between the clubhouse, playing fields, spectator areas and supporting club functions. • The proposed changes therefore do not alter the intended operation of the approved development and do not result in substantially different development.
Does not remove a component that is integral to the operation of the development	The proposed minor change will not remove a component of the approved development that is integral to the operation of the approved uses
Does not significantly impact on traffic flow and the transport network, such as increasing traffic to the site	<p>The proposed changes will not significantly impact on traffic flow or the transport network, nor increase traffic generation to the site for the reasons set out below.</p> <ul style="list-style-type: none"> • The proposal does not introduce any new land uses or materially alter the operational profile of the approved development. The site will continue to function as a community-focused sporting facility in a manner generally consistent with the existing approval. • The proposed clubhouse changes are directed toward improving the functionality and operational efficiency of approved facilities, rather than increasing patronage, activity levels or site demand. • The proposed Stage 1 development maintains the existing supply of 113 on-site car parking spaces through interim arrangements, ensuring that parking availability remains consistent with

Table 5 – Assessment of Substantially Different Development Criteria	
Minor Change Criteria	Assessment
	<p>existing conditions during delivery of the development.</p> <ul style="list-style-type: none"> • The ultimate provision of 127 car parks will be provided upon the completion of all stages. • The proposal does not alter the approved site access arrangements or internal circulation network. • The proposed changes therefore do not significantly impact traffic flow or the transport network and do not result in substantially different development.
Does not introduce new impacts or increase the severity of known impacts	<p>The proposed changes will not introduce new impacts or increase the severity of known impacts for the reasons set out below.</p> <ul style="list-style-type: none"> • The proposal does not introduce any new land uses or materially alter the operational profile of the approved development, with the site continuing to function as a community-focused sporting facility. • The proposed amendments are directed toward improving the functionality and operational efficiency of approved facilities, rather than increasing patronage, activity levels or operational demand. • The proposal maintains the approved site access arrangements and parking supply during Stage 1, with no material increase in traffic generation or associated transport impacts anticipated. • The revised built form remains generally consistent with the approved development in terms of scale, height and overall presentation, and does not introduce any new amenity impacts. • The proposed changes therefore do not introduce new impacts or increase the severity of known impacts and do not result in substantially different development.
Does not remove and incentive or offset component that would have balanced a negative impact of the development	<p>We are not aware of any incentive or offset component¹¹ having been considered by Brisbane City Council in their assessment of the original development application.</p>
Does not impact on infrastructure provisions	<p>The minor change does not impact on infrastructure provisions.</p>

As identified in the above table, the proposed development satisfies the criteria for a minor change in Schedule 2 of the Planning Act, including the guidelines for substantially different development.

4.2 Assessment against Applicable Planning Framework

Section 81(2)(d) and (3) of the Planning Act provides the matters to which Brisbane City Council must have regard to in assessing the Change Application (Minor Change). This includes the information included with the application, any properly made submissions about the application, all matters that responsible entity would or may assess against or have regard to if the change application were a development application, and any matter that the responsible entity considers relevant.

The responsible entity must assess against, or have regard to, the matters that applied when the development application was made. The responsible entity may assess against, or have regard to, the matters that applied when the change application was made.

The original application was assessed and decided under the legislative framework of the Planning Act 2016 (Planning Act), with the City Plan providing the relevant planning scheme provisions. The legislative framework remains consistent for this change application. The original development application triggered Impact Assessment and required public notification.

22 properly made submissions were received during the public notification period of the original application. Notably, 20 of the submissions were in support of the development, citing continued provision of open space and recreational value, enhanced female participation in sport, no adverse impacts on adjoining sporting facilities/clubs and an overall broader community benefit beyond rugby. Regarding the to (2) submissions objecting, the submissions noted the following:

- Tree/ecological sustainability;
- Assertions that signage occurred in limited locations;
- Bulk and scale/overdevelopment;
- Public open space loss;
- Traffic and Parking concerns;
- Property values;
- Inappropriate Health Care Service use in the zone; and
- Hours of operation.

The issues raised in the submissions, and addressed through the assessment of the original application, will not change for the following reasons:

- Council previously considered matters relating to vegetation removal as part of the approved redevelopment. The current proposal does not increase ecological impacts and instead provides an improved tree retention outcome, reducing approved major tree removals from 24 to 14 trees. As such, the proposal does not give rise to any additional ecological or vegetation impacts beyond those already considered by Council.
- Matters relating to public notification and signage were considered and resolved by Council during the assessment of the original application.
- Council previously accepted the appropriateness of the redevelopment having regard to the scale, bulk and siting of development within the Sport and Recreation Zone. The current proposal does not materially alter the approved built form outcome in terms of overall bulk and scale, with amendments directed toward operational refinements to the approved clubhouse facilities. The proposal therefore does not result in any material increase in bulk, scale or visual dominance beyond that previously approved.
- The proposal does not alter the approved sporting and recreation function of the site or the broader recreational role of Brothers Rugby Club. The current application does not involve any

material change to the approved use of the site as a sporting and recreation facility and therefore does not alter the matters previously considered by Council in relation to public open space.

- Traffic generation, parking demand and access arrangements were previously assessed by Council as part of the approved development. The current proposal does not materially alter the approved operational profile, patronage or sporting capacity of the site and will therefore not materially alter traffic generation or parking demand. Interim parking arrangements maintain the existing parking supply during Stage 1 (113 car parks), with an ultimate parking outcome coherent with the current approval proposed through future stages.
- Potential impacts on property values continues to not be relevant planning consideration under the *Planning Act 2016* or *Brisbane City Plan 2014*.
- The proposed Change Application does not seek to amend or intensify the approved Health Care Service use previously approved by Council. Accordingly, the appropriateness of the use within the Sport and Recreation Zone remains unchanged from the existing approval.
- The proposal does not seek any changes to the approved hours of operation for the site. The approved operational profile of the clubhouse and associated sporting facilities therefore remains unchanged from that previously considered approved by Council.

The proposed changes to the development will not alter the approved development's compliance with the town planning framework applicable at the time current application or the matters that apply at the time this change application is made. The original application was assessed against the applicable provisions of the Sport and Recreation Zone Code, Albion Neighbourhood Plan Code, Outdoor Sport and Recreation Code, Community Facility Code and relevant Overlay Codes and other Development Codes.

As set out in **Table 1** above there has been changes in designations between the planning framework applicable to the most recent approval and the planning framework applicable to this planning application, relating to the Flood Overlay Code. The changes to the identified area of the Overlay do not affect the proposed development. Refer to the Engineering Technical Memo (**Attachment E**).

Notwithstanding, a review of both the new relevant applicable codes, and the current versions of the applicable codes have determined that there are no substantive changes to the provisions that would impact on the proposed changes, with particular aspects discussed below.

- The proposed changes to the development will not alter the approved development's compliance with the town planning framework applicable at the time of the current approval or the matters that apply at the time this change application is made.
- The most development application was assessed against the applicable provisions of the Sport and Recreation Zone, the Albion Neighbourhood Plan Code (no precinct), Primary Codes, relevant Overlay Code and other Prescribed Secondary Codes. The assessment remains consistent at the time of this change application, and applicable provisions of the relevant codes also remain substantively consistent.
- A summary of the development's compliance with the built form provisions is provided below:

- **Building Height** – The proposed development remains generally consistent with the approved building height and overall vertical scale contemplated by Council under the existing approval. While a modest second floor component is proposed as part of the revised clubhouse outcome (relating to a corporate box and coaches' box), this element is limited in extent and integrated within the broader clubhouse form. The proposal does not materially alter the visual scale or prominence of development across the site and continues to maintain a built form outcome commensurate with the established sporting and recreation character of the locality.

Importantly, the revised clubhouse remains visually appropriate to the broader open sporting setting of the site and does not result in any material increase in building dominance or visual bulk when viewed from adjoining road frontages or surrounding land. In this regard, the proposed development maintains a height outcome generally consistent with that already approved by Council. Accordingly, the development continues to comply with AO14 Community Facilities Code.

- **Setbacks** – The proposed amendments do not materially alter the established setback relationship of development across the site. The revised clubhouse footprint remains generally coherent with the location and siting of the approved clubhouse, maintaining appropriate separation to site boundaries, adjoining land and established sporting facilities.

In particular, the proposal retains substantial separation to adjoining sensitive interfaces, including the Local Heritage Place at 19 Royal Terrace, Albion, and does not introduce any additional amenity impacts in terms of visual bulk, overshadowing or privacy. The revised built form therefore maintains a similar spatial arrangement of built form across the site and remains appropriate having regard to the scale and function of the development. Accordingly, the development continues to comply with AO16.2 of the Community Facilities Code.

- **Site Cover** – The proposal does not result in a material intensification of built form or site coverage when compared with the approved development. The revised clubhouse facilities represent a refinement of the already approved outcome, with built form remaining concentrated within the established clubhouse precinct of the site.

Importantly, the proposal maintains the broader open character of the sporting fields and associated recreation areas, with the development continuing to present as a low-scale ancillary built form outcome within a predominantly open sporting environment. In this regard, the proposal does not materially alter the balance between built and unbuilt areas and the development continues to comply with AO14 of the Community Facilities Code.

- **Car Parking** – The proposal has been specifically designed to maintain the existing on-site parking provision throughout the delivery of the revised Stage 1 works. The site currently accommodates 113 car parking spaces, and interim arrangements ensure this level of parking supply is retained during the delivery of the revised clubhouse facilities.

Given the proposal does not materially alter the operational profile, patronage or activity associated with the approved sporting use of the site, no increase in parking demand is anticipated during Stage 1. The revised clubhouse facilities continue to support the same

underlying sporting activities and capacity of the rugby fields that generate the primary demand for the site.

Importantly, the proposal does not reduce the ultimate approved parking outcome for the site. Upon completion of future stages, the development will provide an ultimate parking supply of 127 car parking spaces (including tandem and accessible spaces), consistent with the intended operation and future visitation demands of the broader approved master plan. In this regard, the proposal maintains compliance with the AO1 of the Transport, Access, Parking and Servicing Code.

- **Adjoining Local Heritage Place** – the proposal continues to ensure that it does not visually detract from, dominate or diminish the heritage significance or setting of the adjoining Local Heritage Place. Specifically, the proposal does not involve any works to the adjoining heritage place on the eastern side, at 19 Royal Terrace, Albion. The works are limited to a reconfiguration and resurfacing of the already approved clubhouse facilities which are located approximately 140m west of the Local heritage Place. Importantly, the proposal does not materially alter the approved, height, scale or overall built form outcome, as relevant to the assessment of the adjoining local heritage place. Accordingly, the development continues to comply with PO16 of the Heritage Overlay Code.
- **Landscaping and Vegetation** – The proposal maintains the established landscaped and open character of the site and does not result in a material reduction in landscaping outcomes when compared with the approved development. The revised clubhouse footprint remains generally consistent with the approved built form extent and continues to integrate with the surrounding sporting and landscaped setting.

Importantly, the revised tree removal strategy results in an improved vegetation retention outcome, with the proposal reducing the number of approved mature tree removals from 24 to 14 major trees, equating to the retention of an additional 10 mature trees across the site. In this regard, the proposal represents an improved landscaping outcome relative to the existing approval while maintaining the intended functionality and operation of the sporting facilities. In this regard, the proposal maintains compliance with Strategic Outcome SO11 of Element 2.1 Brisbane's Identity and Land Use Strategy L17 of Element 2.1 Brisbane's Identity.

- The original development application was subject to code assessment procedures and accordingly, no properly made submissions were received.

5 Summary

This Town Planning Assessment in respect of the proposed Change Application (Minor Change) for the development approval at 103 Crosby Road, Albion has assessed the proposed changes having regard to the relevant statutory town planning framework for a Change Application.

This Town Planning Assessment concludes that the proposed Change Application satisfies the relevant statutory town planning framework pursuant to the *Planning Act 2016*.

We recommend that the Change Application be approved, with the drawings and documents, conditions and infrastructure charges notice updated as per the recommendations identified within this Town Planning Assessment.