

30/06/2026

BCC Ref: A007048080

ATP Ref: Fee reduction request - 2327 Wynnum Rd.pdf

The General Manager of Development Services
Brisbane City Council
City Planning and Economic Development Services
Lvl 1 / 266 George St
Brisbane QLD 4001

Dear General Manager,

RE: REQUEST FOR CONSIDERATION TO DEVELOPMENT
APPLICATION FEE FOR THE CHANGE (OTHER) APPLICATION
AT 2327 WYNNUM ROAD WYNNUM.

I act as town planning consultant for the above application and write to respectfully request that the General Manager of Development Services give consideration to the development application fee applicable to this matter.

The subject site at 2327 Wynnum Road, Wynnum (Lot 1 on SP331907) is occupied by a two-storey building containing 14 self-contained independent living units that has operated as an aged persons' home since the early 1970's under a Consent Permit granted by Brisbane City Council's Registration Board. The building has provided low-cost rental accommodation for older members of the community for more than 50 years, with all residents being tenants on a standard tenancy arrangement. The entire property is held under a single title, with it being understood that there is no capacity for individual units to be strata titled or separately sold.

The current application seeks approval to change the original approval to add 9 further independent living units to the existing 14, bringing the total to 23. The current building has a gross floor area (GFA) of 506m², with the additional 9 rooms to add 330m², resulting in

a total GFA of 836m². The additional units are intended to help fund the substantial cost of upgrading the existing building, which is now approximately 50 years old, including refurbishment of the existing units to the Livable Housing Australia “Gold Standard” and the installation of a lift to ensure safe and accessible accommodation for all residents. The proposal will continue to provide affordable rental accommodation for older people in the Wynnum–Manly area and is not intended to operate as, nor does it have the characteristics of, a commercial retirement village.

Council has assessed the development application fee under the Multiple Dwelling Development fee category, on the basis that the proposed use falls within the definition of a retirement facility, resulting in a fee of \$25,168.00. We submit that the more appropriate fee category is the Development Assessment Area Charge Development category, under which Rooming Accommodation is expressly listed, with an applicable fee of approximately \$10,153.00, based on a total of 836m² of gross floor area. The following matters are put forward in support of this request.

1. Nature of Occupancy - Not a Retirement Village Scheme

The City Plan 2014 definition of “Retirement facility” refers to accommodation for older members of the community in “independent living units or serviced units”. This language mirrors the definition of a “retirement village” in the Retirement Villages Act 1999 (Qld) (RVA), which provides that a retirement village is premises where older or retired persons reside in independent living units or serviced units under a retirement village scheme. Under the RVA, a retirement village scheme is one under which a person enters into a residence contract and, in consideration for paying an ingoing contribution, acquires the right to reside in the village. A residence contract must restrict the way in which the right to reside may be disposed of, and include a service agreement for ongoing charges.

None of these elements apply to the subject facility. Residents do not enter into residence contracts and do not pay ingoing contributions. There are no deferred management fees or exit entitlements. Residents hold standard periodic tenancy agreements under the Residential Tenancies and Rooming Accommodation Act 2008 (Qld), paying only ordinary weekly rent and are free to vacate on the usual notice. They are tenants, not owner-occupiers and hold no interest in

the property beyond their tenancy. The facility does not operate and has never operated, as a retirement village scheme. The occupancy model is fundamentally different in character, financial structure and legal framework from a retirement facility as contemplated by City Plan 2014 and the RVA, and the fee applicable to retirement facilities should not apply.

2. Over 50 Years of Affordable Housing Provision

The use has operated as an aged persons' home for more than 50 years. The existing 14 independent living units represent one of the most affordable housing options for older people in the Wynnum-Manly area, with many residents being pensioners or otherwise on limited incomes. On the rare occasions that vacancies arise, they generate a high level of enquiry, confirming the critical role this accommodation plays in responding to an ongoing and significant community need.

The proposed change, to add 9 further independent living units, is in part intended to fund the substantial cost of refurbishing the existing 14 units, which are now over 50 years old, including the installation of a lift and the upgrade of all existing units to the Livable Housing Australia "Gold Standard". The application is not a commercial retirement village development; it is a community-driven upgrade of a long-established affordable housing facility.

3. Established Local Operator

The applicant is a long-standing, family-run owner and operator of affordable housing in Brisbane with more than 50 years of experience in the local residential sector and deep roots in Brisbane's bayside communities. The applicant operates other similar budget accommodation facilities in the area, demonstrating a sustained and genuine commitment to providing accessible and well-managed housing for those who need it most.

In light of the above, we respectfully submit that the Development Assessment Area Charge Development fee, under which Rooming Accommodation is expressly listed, is the appropriate fee category for this application. We note that the 2025–26 Development Assessment and Compliance Fees brochure confirms that the General Manager of

Development Services may determine an appropriate fee where the standard categories do not squarely apply.

We request that this discretion be exercised in favour of the lower fee, having regard to the nature of the use, the single-title tenure arrangements, the 50-year history of affordable housing provision, and the significant community benefit this proposal delivers.

Thank you for your attention to this matter. I look forward to your further advice.

Kind regards
ATOMIC TOWN PLANNING



LAURIE BEVERLEY M. URB DEV., MPIA
DIRECTOR