

27 July 2026

The Assessment Manager
Brisbane City Council
GPO Box

Dear Sir / Madam,

Minor Change to Development Approval Over Land at 450 Queen Street, Brisbane City (Council Ref: A005905778)

In accordance with *Section 78 and 81 of the Planning Act 2016* ('Planning Act') and on behalf of *PGIM (Australia) Pty Ltd* ('the Applicant'), we wish to seek a Minor Change to a Development Approval over the land at 450 Queen Street Brisbane City ('the Site'). This land is formally described as Lot 2 on SP261923.

The Minor Change is made to the most recent approval over the site, issued by council on 17 September 2025 (Council Ref: A006779648). This Minor Change application is accompanied by, and must be read in conjunction with, the following material:

- Attachment A – DA Form 5;
- Attachment B – Signed Owners Consent;
- Attachment C – Property Title Documentation;
- Attachment D – Existing Development Approval;
- Attachment E – Updated Architectural Plans prepared by FK Australia;
- Attachment F – Minor Change Comparison Issue prepared by FK Australia;
- Attachment G – Updated Landscape Plans prepared by Lat27;
- Attachment H – Landscape Technical Memo prepared by Lat27;
- Attachment I – Transport Impact Statement for Minor Change prepared by Colliers;
- Attachment J – Operational Waste Management Plan Addendum prepared by Colliers; and
- Attachment K – Heritage Letter, prepared by Urbis

A detailed description of the proposed Minor Change along with the relevant background information has been detailed in the following sections.

1 Site Context

The site is located at 450 Queen Street, Brisbane, formally described as Lot 2 on SP261923. The site has a lot size of 1,708m² and a frontage length of approximately 39.5m to Queen Street. Several easements affect the land along the Western Boundary and within the north-west corner of the site. An aerial photograph of the site is provided below as **Figure 1**. Construction works are underway and the project is well progressed.

Figure 1 – Aerial Site View



Source: Nearmap (March 2026)

The site is mapped within the Principal Centre Zone of the Brisbane City Plan 2014 and is situated within the City Centre Neighbourhood Plan. The site is not located within a Neighbourhood Plan Precinct.

2 Existing Approval History

Existing Approval for Adaptive reuse of Existing Building – A005905778

On 13th May 2022, Brisbane City Council approved an Impact Assessable Development Application on the site seeking a Development Permit for a Material Change of Use for Office and Food and Drink Outlet adjoining a State Heritage Place. The approved development involved the adaptive reuse of the existing building to create a renewed 23 storey commercial tower on the site. The original development application was impact assessable and was lodged under the Brisbane City Plan 2014. The application received no submissions, properly made or otherwise.

Approval to Demolish Existing Building – A006472282

An approval to demolish the building and construct a temporary park was issued by Council 7 June 2024 (Council Reference: A006472282). This approval related to a development direction that did not involve adaptively reusing the existing building in accordance with the existing approval. The temporary park was to remain until such a time that a new approval was issued and commenced over the site. This approval was not enacted and no longer reflects the development outcome ultimately pursued.

Minor Change Approval 2025 – A006779648

On the 17 September 2025, Brisbane City Council approved a minor change for the existing approval, seeing minor increases to GFA, reconfiguration of tenancies and façade changes. The change also included alterations to the built form such as decreases to front, side and rear setbacks, an increase to the overall building height from 23 to 24 storeys and revised floor plans for the offices across all the tower levels. A concurrent minor change application was also made to SARA, which was approved 15 August 2025.

3 Proposed Changes

Since approval of the previous Minor Change application, construction of the development has commenced, with practical completion anticipated in September 2026. Through detailed design development and construction coordination, several refinements have been identified to improve the functionality, presentation and operational performance of the approved development.

Updated Architectural Plans are provided as **Attachment E**.

The proposed changes primarily relate to:

- reconfiguration of the ground floor tenancy layout to accommodate a confirmed food and drink operator;
- relocation of visitor bicycle parking associated with approved streetscape works;
- refinement of landscape and façade elements;
- minor adjustments to waste, servicing and parking arrangements;
- refinement of the rooftop screening and associated building services; and
- other detailed design and construction coordination amendments..

The proposed changes are also illustrated on the comparison plans contained in **Attachment F** and are addressed in further detail below.

Table 1 – Summary and Comparison of Key Development Details

Element	Approved Development (2025)	Proposed Minor Change
Site Cover (Podium)	54%	54%
Site Cover (Tower)	918m ²	918m ²
Building Height	24-storeys – RL96.960 to top of screening	24-storeys – RL98.980 to top of screening
BCC Gross Floor Area (GFA)	19,669m ²	19,823m ²
Food and Drink Outlet GFA	150m ²	750m ²
Car Parking	49 car parking spaces 1 PWD parking space	47 car parking spaces 1 PWD parking space
End of Trip Facilities	131 employee bicycle parks 40 visitor bicycle parks including 8 visitor spaces at street level 224 lockers 14 shower cubicles	131 employee bicycle parks 32 visitor bicycle parks excluding 8 bicycle parks within verge 224 lockers 14 shower cubicles

3.1 Ground Floor Configuration

The ground floor layout has been refined following confirmation of a future food and drink operator within the approved retail tenancy area. The amendments improve the operational functionality of the tenancy while strengthening activation and engagement with the public realm.

The key changes include:

- establishment of a larger food and drink outlet tenancy at ground level with a GFA of 669m²;
- relocation of the secondary tenancy entry to food and drink outlet;
- rationalisation of the café tenancy and alfresco seating arrangement with a GFA of 81m²;
- refinements to the amenities within the ground floor public lobby.

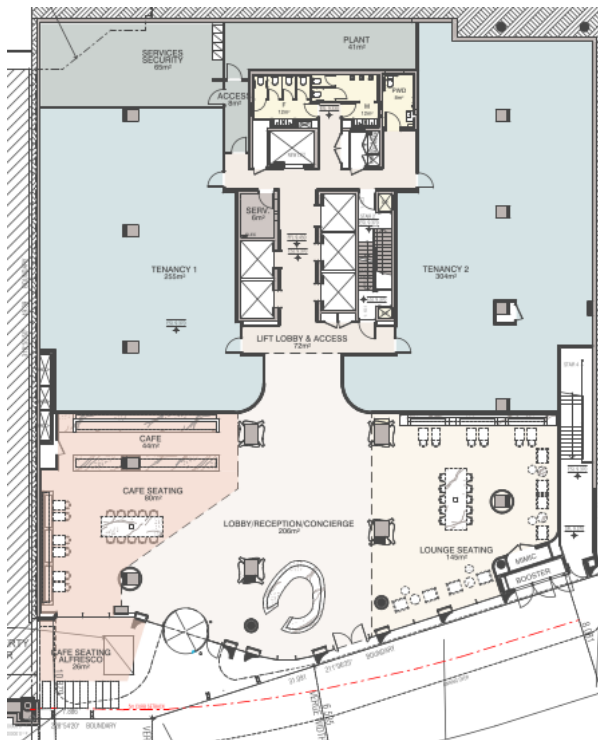
- removal of the lounge seating area.
- relocation of plant room, mech and comms equipment.
- relocation of visitor bicycle parking spaces in front of café and to public verge (discussed in further detail in **Section 3.3**).
- enclosure of gas meter with screening along western boundary (discussed in further detail in **Section 3.4**).

The revised substantially maintains the approved building envelope while delivering a more active and commercially viable ground plane outcome. The expanded food and drink tenancy will increase pedestrian activity and improve passive surveillance and activation along the street frontage, consistent with the intent of the City Centre Neighbourhood Plan and Centre Activities and Mixed Use Code.

As a consequence of the increased food and drink tenancy area, the refuse room at Level 1 has been expanded to accommodate operational waste requirements. The Operational Waste Management Plan Addendum prepared by Colliers and provided as **Attachment J** confirms that the revised waste arrangements can be appropriately managed within the site.

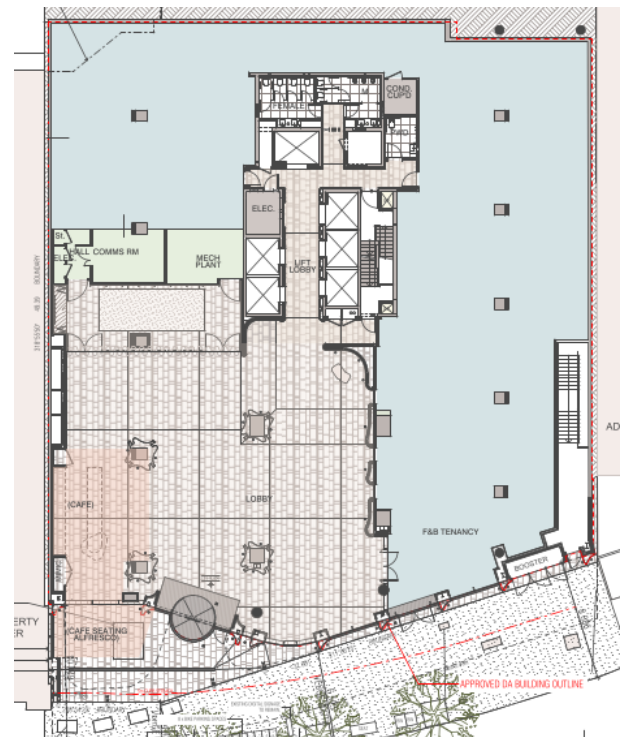
Overall, the revised ground floor arrangement improves the functionality and activation of the development while remaining consistent with the approved planning outcomes.

Figure 2 Ground Floor and Lobby Reception



Picture 1 DA Approved Plan

Source: Fk Australia



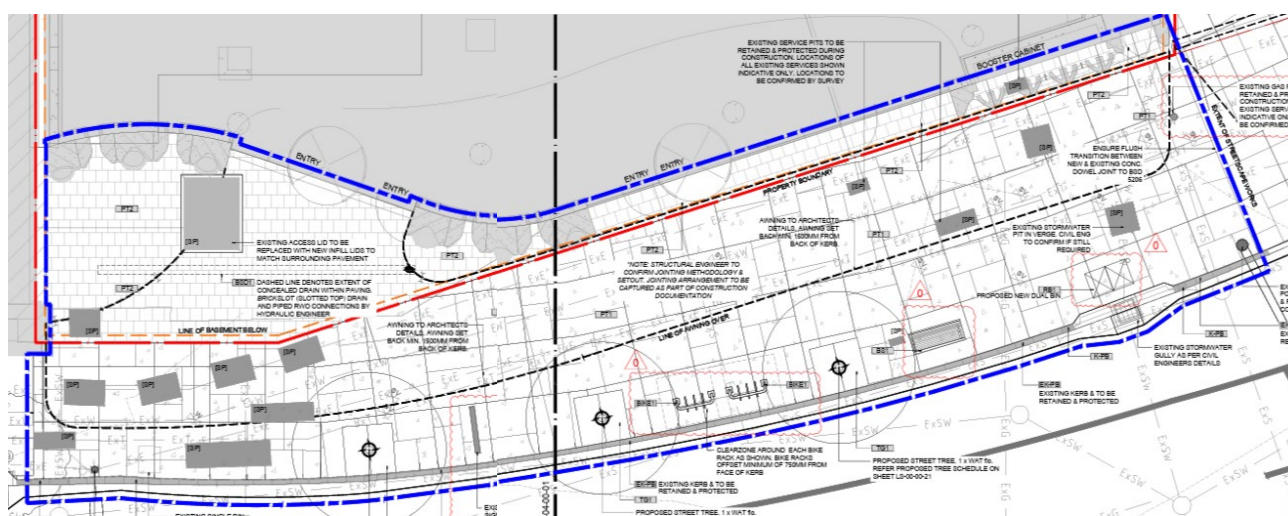
Picture 2 Proposed Minor Change

Source: Fk Australia

3.2 Relocation of Visitor Bicycle Parking Spaces

The proposed relocation of visitor bicycle parking reflects the approved Landscape Works in Streetscape outcome endorsed by Council (Ref: A006739251), which includes provision of eight publicly accessible bicycle parking spaces within the verge adjoining the site, shown in **Figure 3** below.

Figure 3 – Approved Streetscape Works Plan



Source: Lat27

The revised arrangement is considered appropriate and continues to satisfy the intent of the Transport, Access, Parking and Servicing Code for the following reasons:

- the bicycle spaces remain directly adjacent to the site and in close proximity to the principal building entry;
- the spaces are clearly visible, publicly accessible and convenient for visitors;
- the spaces avoid obstructing necessary services and equipment located within the site such as the substation and gas meter;
- the verge location does not impede pedestrian movement or access to the building;
- the arrangement integrates with the approved streetscape design and broader active transport network; and
- the spaces will function equivalently to visitor bicycle spaces located within the site boundary.

The relocation also facilitates a significantly improved ground floor interface by enabling a more functional and active alfresco dining area along the street frontage. This outcome aligns with the City Plan's emphasis on active frontages, permeability and streetscape activation within the City Centre.

The proposal must also be considered in the context of the adaptive reuse nature of the development. As a consequence, the design of all spaces, including the ground floor and parking levels, has been constrained by the existing building. Significant modifications have been required to bring the building up to modern

standards which has resulted in substantially less car parks (a valuable feature in the inner-city) and limited flexibility in the configuration of remaining spaces. Given the limitations of the existing building, any proposed re-location within the site would detrimentally impact on the activation of the street and pedestrian flow in and out of the building.

Importantly, the overall visitor bicycle parking provision remains sufficient to accommodate anticipated demand, and the proposal does not compromise the intent or performance outcomes of the planning scheme.

Refer to the Transport Impact Statement prepared by Colliers and included as **Attachment I**.

3.3 Gas Meter Enclosure

A new architectural screen is proposed along the western Queen Street boundary to enclose the gas meter infrastructure associated with the development.

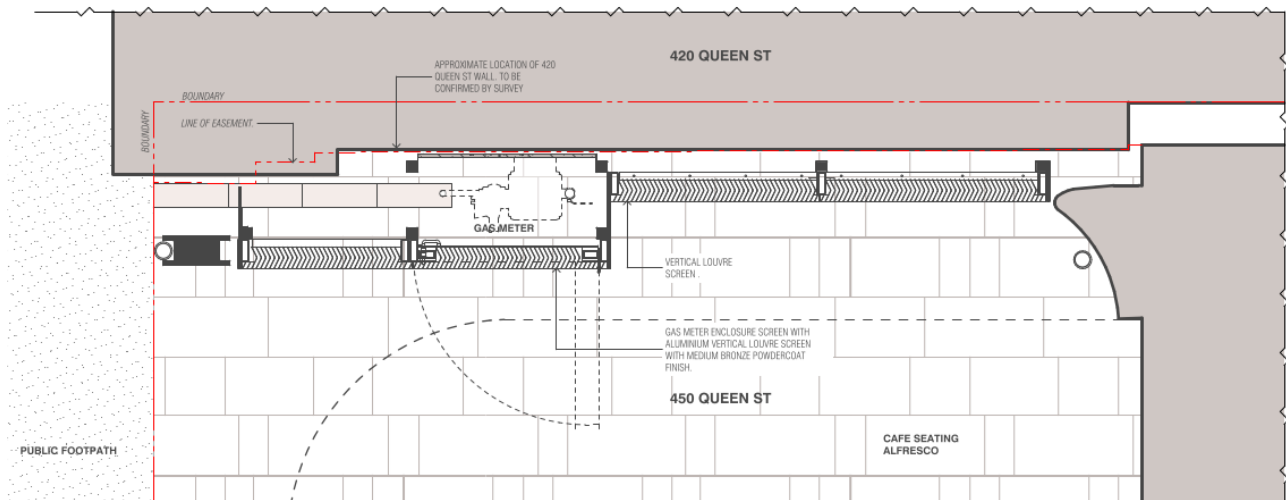
The enclosure has been carefully designed as a lightweight and recessive element comprising vertical aluminium louvres with a medium bronze powder-coated finish. The screen improves the visual presentation of the ground floor frontage and integrates the servicing infrastructure into the overall architectural language of the development.

The adjoining wall is associated with the former Queensland Country Life Building façade, a State heritage place. A Heritage Statement prepared by Urbis, provided as **Attachment K**, confirms that the proposed screen is consistent with the intent of Queensland Heritage Place State Code PO8, as it:

- remains visually lightweight and subordinate to the heritage façade;
- does not obscure or diminish significant heritage fabric; and
- maintains appreciation of the heritage place within the streetscape.

Figure 4 illustrates the proposed screen in plan form and **Figure 5** provides a 3D representation of the proposed outcome.

Figure 4 Gas Meter Plan



Source: FK Australia

Figure 5 3D View of Enclosure



Source: FK Australia

3.4 Changes to Podium Level 1

Minor refinements are proposed to the Level 1 podium layout to accommodate the expanded refuse area associated with the revised ground floor tenancy configuration.

The changes include:

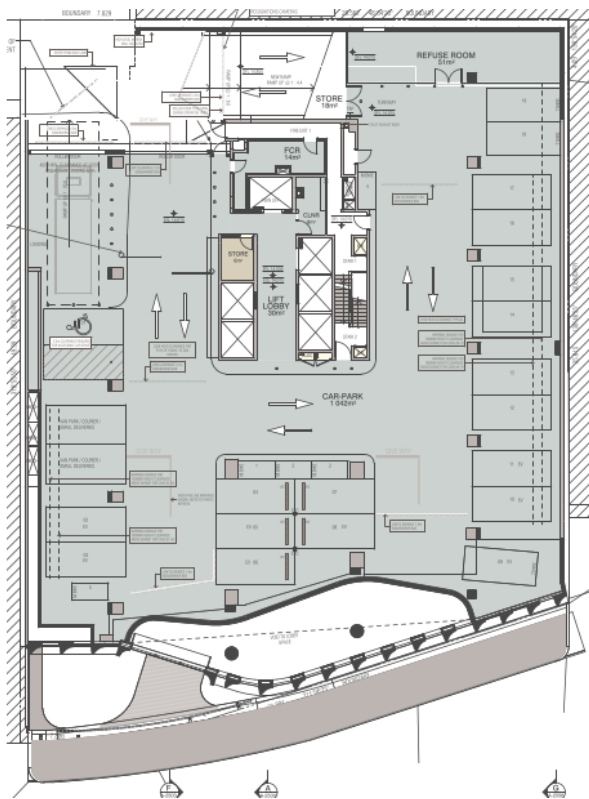
- extension of the waste storage area;
- provision of an additional storage room; and
- removal of two standard car parking spaces.

The amendments are operational in nature and confined entirely within the approved podium envelope. The revised parking provision remains appropriate for the development, particularly having regard to:

- the highly accessible inner-city location which is subject to a maximum car parking rate;
- proximity to public and active transport infrastructure;
- the substantial end-of-trip facilities provided onsite; and • the adaptive reuse constraints associated with the retained building structure.

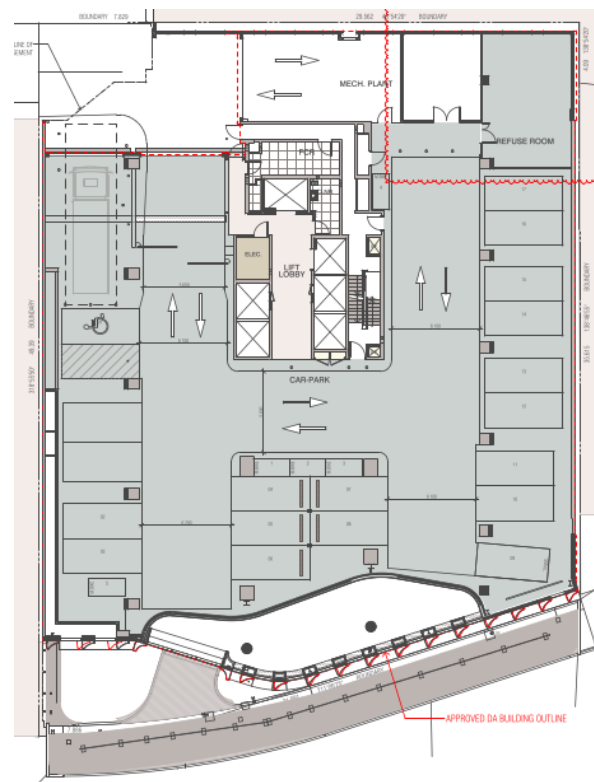
The changes do not alter the external appearance or overall function of the development and remain consistent with the transport and servicing outcomes anticipated by the approval.

Figure 6 Podium Level 1



Picture 3 DA Approved Plan

Source: FK Australia



Picture 4 Proposed Minor Change

Source: FK Australia

3.5 Changes to Landscaping Elements

The landscape design has been refined through detailed design development to better coordinate with the final façade structure and constructed outcomes. Updated Landscape Plans are provided as **Attachment G**.

The changes include:

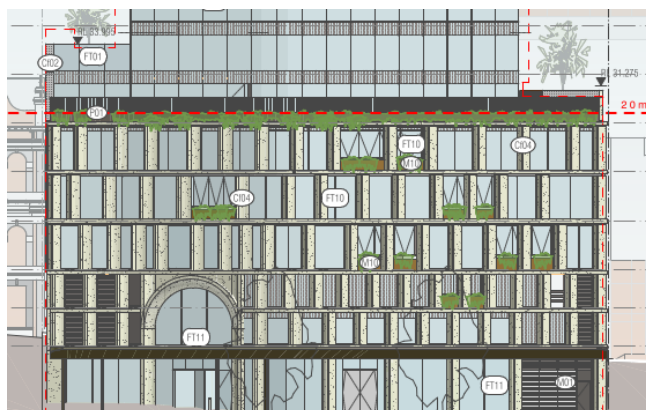
- minor adjustments to façade planter locations across Levels 1 to 5; and
- refinement of planter configurations within terrace areas on Levels 6, 7 and 23.

Importantly, the amendments do not reduce the overall landscape provision. The revised scheme provides 229.5m² of landscaping compared to 228m² previously approved, as outlined in the Landscape Technical Memo provided as **Attachment H**.

The proposed refinements maintain the established landscape character and subtropical design response of the approved development. In particular, the podium landscaping continues to provide:

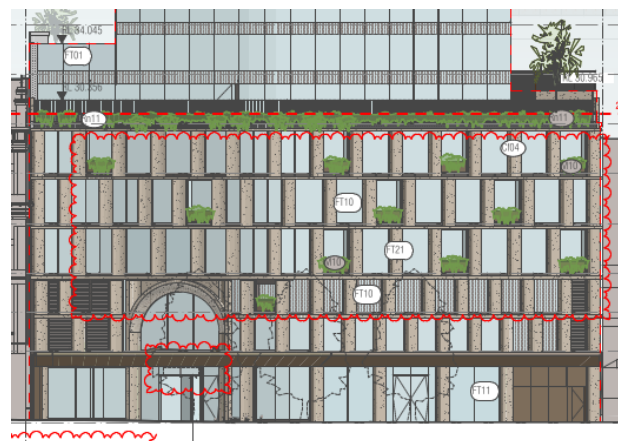
- articulation and softening of the built form;
- visual interest and façade modulation;
- improved outlook and amenity for occupants; and
- consistency with the landscape intent of the approved architectural design.

Figure 7 Podium Landscaping



Picture 5 DA Approved Plan

Source: FK Australia



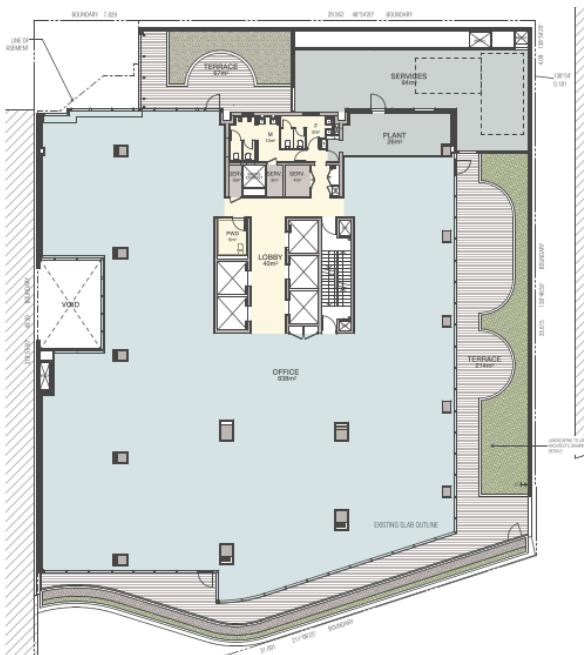
Picture 6 Proposed Minor Change

Source: FK Australia

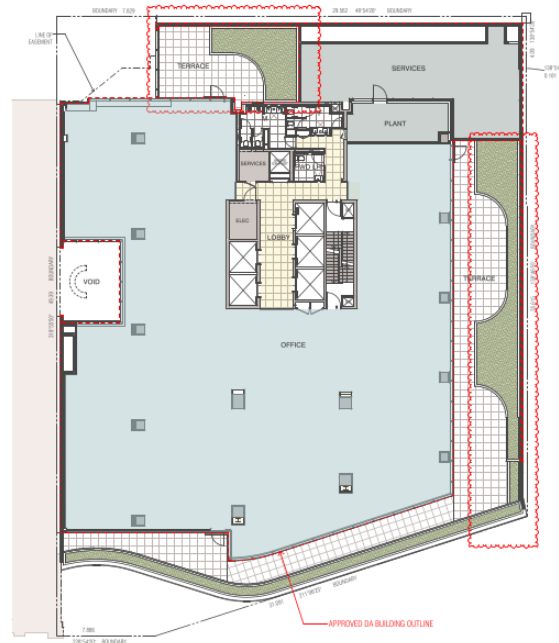
The terrace landscape refinements similarly improve usability and operational performance while maintaining the overall landscape outcomes previously endorsed by Council.

Accordingly, the changes represent detailed design refinements that do not materially alter the approved development or reduce compliance with the planning scheme.

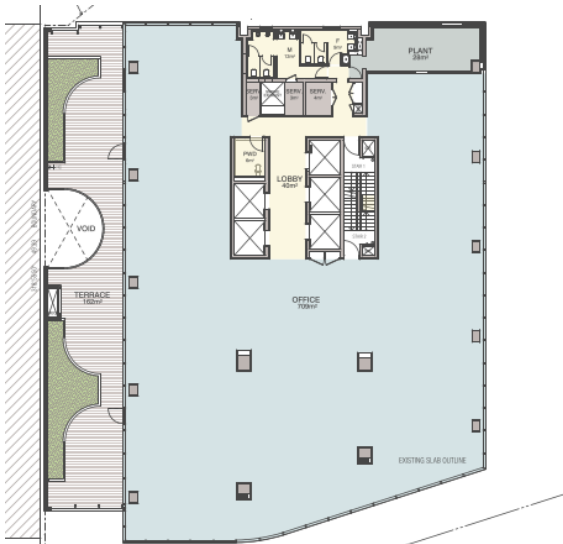
Figure 8 – Changes to Terrace Landscaping



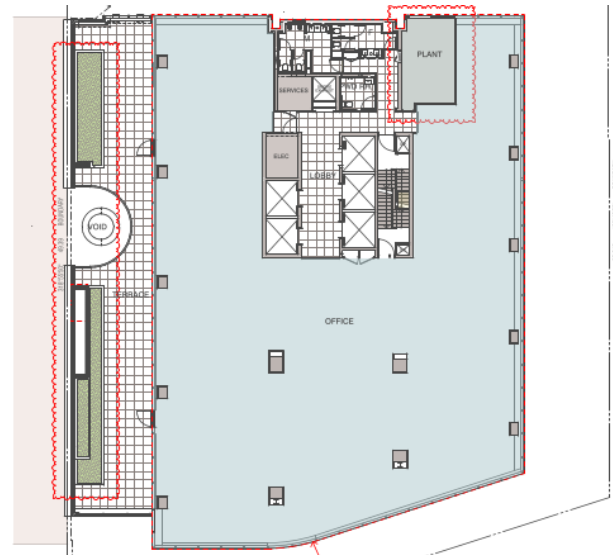
Picture 7 Level 6 Approved



Picture 8 Level 6 Proposed



Picture 9 Level 7 Approved



Picture 10 Level 7 Proposed

Source: FK Australia

Source: FK Australia

3.6 Rooftop Changes

The rooftop design has been refined to incorporate additional architectural screening to fully conceal smoke lobby exhaust ducting and associated rooftop plant infrastructure. As a result, the maximum height of the rooftop screening increases from RL96.960 to RL98.980, shown below in **Figure 9**.

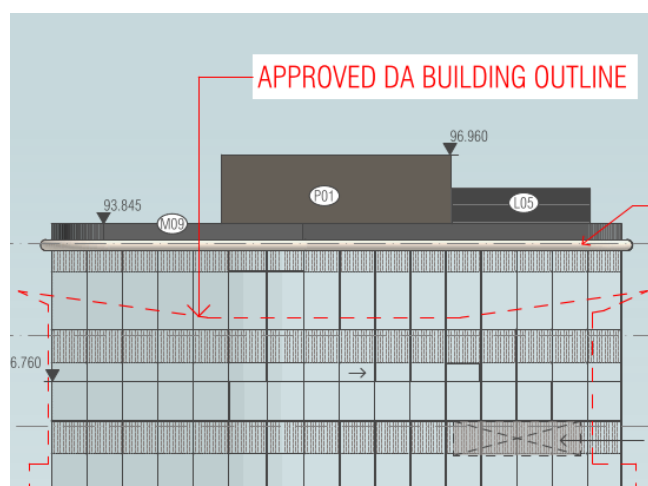
The proposed amendment is minor in nature and does not materially alter the scale or visual presentation of the approved tower. The additional height is limited to lightweight screening elements associated with building services and does not increase the occupied floor area, tower footprint or building storeys.

The site is located within the City Centre Neighbourhood Plan Area, which does not prescribe a maximum building height. In this context, the amendment does not create additional conflict with any identified assessment benchmark. Further:

- the change does not alter the approved building envelope in any meaningful way;
- the additional screening will not be readily discernible from the public realm due to its setback and integration within the rooftop design;
- the amendment improves the visual presentation of rooftop plant by providing a more cohesive and integrated architectural outcome; and
- the proposal continues to achieve the intended built form and skyline outcomes for the City Centre.

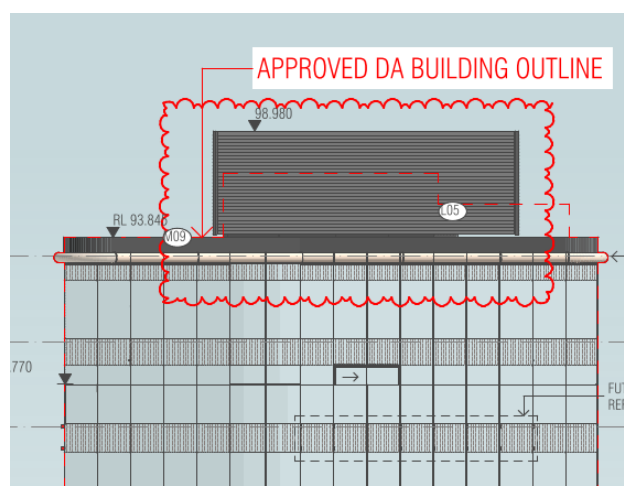
Accordingly, the amendment is appropriately characterised as a minor refinement arising from detailed design development and construction coordination.

Figure 9 – Rooftop Changes



Picture 11 – Approved Rooftop Screening

Source: FK Australia



Picture 12 – Proposed Rooftop Screening

Source: FK Australia

3.7 Additional Changes

Several additional minor refinements are proposed as part of ongoing construction coordination and detailed design resolution, including:

- minor adjustments to the Level 2 parking layout to respond to existing structural column locations;
- refinement of plant room configurations within commercial levels;
- minor changes to PWD and servicing arrangements; and
- extension of the podium façade treatment to enclose the mechanical riser adjacent to the Level 7 terrace.

These changes are limited in scale, internalised within the development, and will not result in any appreciable change to the appearance or operation of the approved development. Collectively, they represent typical detailed design refinements associated with delivery of a complex adaptive reuse project and do not alter the nature or intensity of the approved development.

4 Proposed Changes to Approved Drawings and Documents

The proposed minor change to the development approval will necessitate updated approval plans and revisions to some of the approved supporting documents. These include:

- Architectural Plans, prepared by FK Australia; and
- Landscape Plans, prepared by Lat27.

Subsequent amendments to the following development conditions will be required as part of the proposed changes:

Condition 31) 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. A pavement of minimum Local road standard or equivalent surface material (including associated drainage) to the area on which motor vehicles will be driven and/or parked.*
- ii. Suspended concrete parking areas, aisles and driveways are to be designed and certified by an RPEQ to accommodate the required design vehicles/s identified in this condition.*
- iii. Manoeuvring on site for an LRV, RCV, MRV, VANS and for the loading and unloading of vehicle(s).*
- iv. Parking on the site for ~~49~~ 47 tenant cars (including 1 car parking space for people with disabilities), 11 motorcycle spaces, and provision for the loading and unloading of vehicle(s) within the site. Tandem parking spaces must be allocated to the same tenant.*
- v. Provide 1 LRV service bay, and 2 VAN service bays.*

- vi. All access to the site for service vehicles must be managed and approved by an on-site loading dock manager prior to arrival onsite; to ensure that no conflicts occur.
 - vii. Provide and maintain a minimum of ~~139~~ 99 secure employee bicycle parking spaces, a minimum of ~~40~~ 32 lockable visitor bicycle parking spaces (~~8 of these visitor bicycle parking spaces are to be provided on the street level~~), a minimum of 224 lockers, and a minimum of 14 shower cubicles with ancillary change rooms for both females and males. All visitor bicycle parking spaces must remain accessible at all hours.
 - viii. A minimum of 2.3 metres height clearance to all undercover parking areas and a minimum of 2.5 metres above parking spaces for people with disabilities except where identified on the approved drawings CAR PARK LEVEL 01 – CLEARANCE DIAGRAM SK-0949.1 (~~received 22/05/2025~~ dated 09/07/2026), and CAR PARK LEVEL 02 – CLEARANCE DIAGRAM (~~received 22/05/2025~~ dated 09/07/2026), or otherwise identified in this condition. Existing undercover parking areas which do not achieve the minimum height clearance of 2.3m, must be signed appropriately and be visible to drivers from a distance. A minimum height clearance of 2.5 metres must be achieved above parking spaces for people with disabilities (this includes a minimum 2.2m height clearance along the travel path from the driveway in accordance with AS2890.6:2009). A minimum 4.0m height clearance must be maintained over the service bay. The minimum clear height must be measured to the lowest protrusion from the ceiling (e.g. fire sprinklers, services, lighting fixtures, signs, etc).
 - ix. A height clearance sign located at the entrance(s) to undercover car parking areas clearly visible from the vehicle entrance to the site.
 - x. An appropriate area for the storage and collection of refuse, including recyclables, in a position which is accessible to service vehicles on the site.
 - xi. Provide site-specific signs and line-marking treatments to safely manage the shared movement of vehicles and bicycles within the car parking area between Rich Lane and the EOT access lift on Level 1. Detailed plans documenting these treatments is to be prepared and certified by a RPEQ, with the design to be confirmed at the detailed design phase.
- NOTE: The signs and line-marking design must prioritise bicycle safety, and be prepared in accordance with AS2890.3:2015.
- xii. Provide a convex mirror at the intersection of the ramp, and the circulation aisle on Level 1 to assist cars driving up the ramp to observe vehicles and bicycles approaching from the aisle.
 - xiii. Provide a 'New Lift' to provide access down into the Basement 1 end of trip facilities and bicycle room, with a minimum doorway opening width of 1.4m, and minimum internal dimensions of 1.95m x 1.85m; to provide a functional ingress and egress for cyclists using the bicycle room.
 - xiv. Maintain after hours visitor bicycle parking access between Rich Lane and the end of trip facilities and bicycle parking spaces within Basement 1 (via intercom allowable).

xv. Prepare and implement signs and line markings drawings that show the internal paved areas signed and delineated in accordance with the approved drawings and documents. Appropriate signage and markings throughout the car park areas, servicing areas, and loading bays; should clearly indicate height limitations and restrictions for service vehicles. The drawings must be prepared and certified by a Registered Professional Engineer Queensland in accordance with the relevant Brisbane Planning Scheme Codes and the Manual of Uniform Traffic Control Devices.

PROOF OF FULFILMENT

Certification from a Registered Professional Engineer Queensland, that the above requirements have been implemented in accordance with this condition. Timing: Prior to issue of Certificate of Occupancy/Final Inspection Certificate or prior to commencement of use, whichever comes first.

5 Assessment of Minor Change

Consideration has been given to the relevant matters for assessment of a minor change in the *Planning Act*, having regard to the definition of a minor change in Schedule 2 and the assessment criteria in Section 81, as well as the 'substantially different development' test prescribed in the Development Assessment Rules.

5.1 Schedule 2 Assessment Criteria

Schedule 2 of the *Planning Act 2016* defines a minor change for a development approval. The relevant part of the minor change definition is stated as follows:

"Minor change means 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 regard to, when the application was made; or*
 - E. public notification if public notification was not required for the development application."*

The proposed changes satisfy each of the criteria stated in this definition as the development:

- does not result in substantially different development (see assessment below);

- does not include prohibited development;
- does not trigger referral to a referral agency; and
- does not increase the level of assessment for the Development Application or trigger the requirement for Public Notification.

The following assessment further demonstrates that the proposed changes will not result in substantially different development.

5.1.1 Substantially Different Development

In respect to part (b)(i) of the definition of Minor Change and what constitutes a substantially different development, it is appropriate to have regard to Schedule 1 of the Development Assessment Rules which sets out the substantially different development 'tests'. An assessment of the proposed changes against the substantially different criteria in the Development Assessment Rules is included in the table below.

Guideline Criteria	Response
Involves a new use.	There is no new use proposed with this change application
Results in the application applying to a new parcel of land.	The proposed minor change does not involve a new parcel of land.
Dramatically changes the built form in terms of scale, bulk and appearance.	The built form is not dramatically changed through the proposed minor change by the way of scale, bulk and appearance. The proposed height increase is merely for the purpose of screening and is not considered a dramatic change in the context of the overall building and does not cause non-compliance with any assessment benchmarks.
Changes the ability of the proposed development to operate as intended.	The changes do not alter the ability of the development to operate as intended. The site retains the ability to be accessed and serviced appropriately in accordance with the existing approval over the site.
Removes a component that is integral to the operation of the development.	No integral component is removed as part of the proposal.
Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site.	The proposed changes involve a revised carparking provision arrangements with an overall decrease in car parking provided. The car parking provision for the tower remains at a scale appropriate for the site and is consistent with the requirements set out in the Planning Scheme.

Introduces new impacts or increases the severity of known impacts.	No new impacts are introduced with the change, and no existing impacts increase in severity.
Removes an incentive or offset component that would have balanced a negative impact of the development.	The proposed change does not remove any incentives or offsets that balance a negative impact of the development.
Impacts on infrastructure provision.	There are no impacts on the provision of infrastructure associated with this change application

5.1.2 Prohibited Development

In respect to part (b)(ii)(A) of the definition of Minor Change, the proposed Minor Change will not introduce or involve any prohibited development.

5.1.3 Referral

There will be no new or additional referral agencies as a result of the change.

The original application was referred to SARA due to the adjoining State Heritage Place.

The SARA decision will also need to be changed as part of a minor change application which will be lodged concurrently.

5.1.4 Category of Assessment

In respect to parts (B)(ii)(E) of the definition of Minor Change, the original application was subject to Impact Assessment. The application if remade with the proposed changes, would also be subject to Impact assessment.

In this respect, the proposed changes do not change the level of assessment of the original application.

5.1.5 Notifying Affected Entities

There are no affected entities associated with this Minor Change.

6 Application Fee

In accordance with Brisbane City Council's Schedule of Fees and Charges for 2026/2027, a request to change a development approval via a Minor Change requires a fee of \$3,600. This will be paid upon notification of the receipt from council.

7 Conclusion

In summary, we consider that the above assessment demonstrates that the proposed changes can be considered a minor change to the Development Approval under the Planning Act. The changes do not result in a substantially different development, do not significantly alter the external built form and does not increase potential adverse impacts from the development.



If you have any questions, please do not hesitate to contact Dan Wilson (Senior Consultant), Rachael Greene (Associate Director) or the undersigned on (07) 3007 3800.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Penny Douglas". The signature is written in a cursive, flowing style.

Penny Douglas
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