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APPLICATION REF
A007120542

Our Ref: 21-0285P/05

Your Ref: A007120542

19 October 2026

Attn: Timothy Byrne; Errin Xiaofang Lu

Brisbane City Council

GPO Box 1434, Brisbane, QLD 4001

Via email: Errin.Lu@brisbane.qld.gov.au ; Timothy.Byrne@brisbane.qld.gov.au ; DA_RECORDS@brisbane.qld.gov.au

RE: Minor change test

186 Ingram Rd, Acacia Ridge Qld 4110

Dear Timothy and Errin,

In response to discussions held on 16 October 2026, I refer to the below minor change assessment in support of the current other change application over 186 Ingram Rd, Acacia Ridge Qld 4110 (Council ref: A007120542).

Our assessment concludes that the proposed development would not be substantially different from the approved development. However, the proposed change does not meet the definition of a minor change because the Schedule 20 referral trigger requires the referral agency to assess the application against, or have regard to, matters that were not applicable to the original development application. The application has therefore been properly made as an Other Change under section 82 of the Planning Act 2016.

As the application is not a minor change only because of the additional referral and associated referral assessment matters, section 82(3)(a) of the Planning Act 2016 applies and public notification under section 53 is not required.

Once Council has reviewed our assessment of minor change, we respectfully seek an amendment to the Confirmation Notice dated 16 October 2026 to remove the requirement for public notification. We also request that the amended Confirmation Notice retain the original confirmation date of 16 October 2026.

Thank you for your attention to this matter. Should you have any further queries, please do not hesitate to contact the undersigned on + 61 7 3666 5233.

Yours sincerely,

Rhiannon Cochran

Planner

1. Assessment of Minor Change

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

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

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

'A change that—

b. for a development approval—

i. would not result in substantially different development; and

ii. if a development application for the development, including the change, were made when the change application is made would not cause—

A. the inclusion of prohibited development in the application; or

B. ***referral to a referral agency, other than to the chief executive, if there were no referral agencies for the development application****; or*

C. ***referral to extra referral agencies, other than to the chief executive****; or*

D. a referral agency to assess the application against, or have regard to, matters prescribed by regulation under section 55(2), other than matters the referral agency must have assessed the application against, or have had regard to, when the application was made; or

E. public notification if public notification was not required for the development application'.

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

A full assessment of the proposed changes against the relevant criteria has been completed and outlined in **Table A** and **Table B** below.

Table A: Assessment against minor change criteria (Planning Act)		
Would a new development application, including the changes cause:	Y/N	Comments
The inclusion of prohibited development?	N	No. The proposed changes relate to an existing approved High impact industry (plastic product manufacturing) and do not include prohibited development.
Referral to a referral agency, other than to the Chief Executive, if there were no referral agencies for the development application?	N	No. The original development application was not referred to a referral agency and the proposed changes do not introduce any referral to a referral agency other than the Chief Executive.
Referral to extra referral agencies, other than the Chief Executive?	N	No, other than the State transport matters arising from the Schedule 20 referral trigger. The referral is a procedural consequence of the applicable throughput threshold and does not arise from a new use or materially different industrial activity.
A referral agency to assess the application against or have regard to new matters?	Y	Yes. The proposed annual throughput of approximately 15,000 to 20,000 tonnes exceeds the 10,000 tonne annual throughput threshold for High impact industry under Schedule 20 of the Planning

		Regulation 2017. This introduces an additional referral to the Chief Executive under Schedule 10, Part 9, Division 4, Subdivision 1, Table 1. Accordingly, the proposal does not satisfy the minor change pathway and is made as an Other Change under section 82 of the Planning Act 2016.
Public notification if public notification was not required for the development application?	N	No. Public notification is not required because the application is not a minor change only due to the additional referral arising from the Schedule 20 trigger. Section 82(3)(a) of the Planning Act 2016 provides that public notification does not apply in these circumstances.

1.1. Substantially Different Development Test

Table B: Assessment against substantially different development test (DA Rules)		
Do the changes:	Y/N	Comments
Involve a new use?	N	No. The proposed changes retain the approved High impact industry use for plastic product manufacturing. No new land use is proposed.
Result in the application applying to a new parcel of land?	N	No. The change application continues to apply only to Lot 952 on SL7799 at 186 Ingram Road, Acacia Ridge.
Dramatically change the built form in terms of scale, bulk and appearance?	N	No. The built form changes are limited to extensions and modifications to the existing extrusion building, including enclosure of existing open areas and relocation of a roller door. No new stand-alone building or material increase in building height is proposed. While gross floor area and site cover increase, the development retains the established industrial scale and character of the site.
Change the ability for the approved use to operate as intended?	N	No. The changes support the approved use by allowing a longer, modern extrusion line to be housed entirely within the building and operated safely and efficiently. The approved industrial use will continue to operate as intended.
Remove a component that is integral to the operation of the development?	N	No. No integral component of the approved development is removed. Access, parking, servicing, staff facilities and core manufacturing functions are retained.
Significantly impacts on traffic flow or the transport network?	N	No. Existing access arrangements are retained. The supporting traffic assessment identifies peak parking demand of 36 vehicles and approximately 8 vehicle trips per hour during peak periods, and concludes that the surrounding road network can accommodate the proposal without adverse impacts.
Introduce new impacts or increase the severity of known impacts?	N	No. The proposal does not introduce a new type of impact or materially increase the severity of known impacts. The air and noise assessment confirms that acceptable outcomes can be achieved, the number of extrusion lines reduces from nine to seven, and manufacturing activities remain enclosed within the industrial premises.

Remove an incentive or offset component that would have balanced a negative impact of the development?	N	No. The proposal does not remove an incentive, offset, mitigation measure or other component relied upon to balance an adverse impact of the approved development.
Impact on infrastructure provisions?	N	No. The site remains connected to existing urban services and the proposal does not materially alter access, servicing or infrastructure arrangements. Stormwater from the proposed works will be managed through the established lawful drainage system.

2. Evaluation Against Relevant Assessment Criteria

Section 81(2) of the Planning Act sets forth criteria the responsible entity (which, in this instance, is Brisbane City Council) assessing a minor change application must consider. A response to the relevant assessment criteria is provided below to assist with Council's assessment.

2. *In assessing the change application, the responsible entity must consider—*

   a. *the information the applicant included with the application; and*

Response to Subsection 2(a)

The submitted assessment confirms that if the Schedule 20 threshold requirement were to be removed, the proposal meets the definition of a minor change as set out in the Planning Act, and complies with the relevant matters of assessment, consistently with that previously approved.

Supporting documentation provides a brief background of the approval history along with a detailed overview of the proposed changes to the development approval.

The proposed changes are supported by revised plans and technical assessment to assist Council in its assessment. All information required for Council to assess the application has been provided.

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

Response to Subsection 2(b)

The proposed changes will not impact on the matters raised in the submissions on the basis that:

- No changes are proposed to the approved stormwater/lawful drainage system.
- The proposed change will not increase the severity of air-quality or dust impacts. Notwithstanding, an updated technical assessment has been provided.
- Noise emissions to the north will be mitigated through the relocation of the roller door to the western side of the building.
- A decrease in operational machinery is proposed. However, No reduction in the approved car-parking provision is proposed.

On this basis, it is not anticipated the proposed changes introduce matters which require reconsideration of previously made submissions.

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

Response to Subsection 2(c)

A pre-request response was not provided.

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

Response to Subsection 2(d)

The responsible entity of this change request is Brisbane City Council and not the Minister.

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

Response to Subsection 2(e)

The responsible entity of this change request is Brisbane City Council and not the chief executive.

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

Response to Subsection 2(f)

An Other Change application, rather than a Minor Change application, is required because the anticipated annual throughput of approximately 15,000 to 20,000 tonnes per annum introduces **a State referral trigger under Schedule 20 - Development impacting on State transport infrastructure and thresholds of the Planning Regulation 2017.**

The previous approvals did not identify this referral requirement and, accordingly, the shift to an Other Change process is procedural in nature. Notwithstanding, the need for referral arises from the applicable assessment framework rather than any substantial increase in the scale, intensity or character of the approved development.

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

Response to Subsection 2(g)

As above.

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

Response to Subsections 3, 4 and 5

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

3. Other Change Conclusions

As shown, our assessment concludes that the proposed changes do not constitute 'substantially different development'. Notwithstanding, the change does not comply with the criteria specified under the definition of a 'minor change' within Schedule 2 of the Planning Act, specifically with respect to item (b)(ii)(B).

An Other Change application, rather than a Minor Change application, is required because the anticipated annual throughput of approximately 15,000 to 20,000 tonnes per annum introduces a State referral trigger under Schedule 20 - Development impacting on State transport infrastructure and thresholds of the Planning Regulation 2017.

Notwithstanding, the need for referral arises from the applicable assessment framework rather than any substantial increase in the scale, intensity or character of the approved development. The previous approvals did not identify this referral requirement and, accordingly, the shift to an Other Change process is procedural in nature.

Thank you for your attention to this matter. We now ask that you process this application at your earliest convenience.