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Our ref: AU017765

Date: 29 May 2026

Chief Executive Officer
Brisbane City Council
City Planning & Sustainability
Development Services
GPO Box 1434
Brisbane QLD 4001

Attn: Dominic Hudson

Dear Dominic,

APPLICATION FOR A MINOR CHANGE TO A DEVELOPMENT APPROVAL (PURSUANT TO SECTION 78 OF THE PLANNING ACT 2016)

36 Little Edward Street, Spring Hill QLD 4000 (Lot 3 RP40456)

BCC ref: A006841446

We write in regard to the Development Approval for a Minor Change issued by Brisbane City Council (BCC) on 20 November 2025 over land located at 36 Little Edward Street, Spring Hill QLD 4000 (Lot 3 RP40456) (herein referred to as the site). The Development Approval (BCC ref: A006841446) comprises:

- Development Permit for **Material Change of Use** for **Rooming Accommodation**
- Development Permit for **Material Change of Use** for **Health Care Service, Office, Shop, and Food and drink outlet**

On behalf of *Edward 36 Pty Ltd* (the applicant), we make this Minor Change application to change the above Development Approval. The proposed change is defined as a **minor change** pursuant to section 81 of the *Planning Act 2016*. As BCC was the assessment manager for the original application, they are also the 'responsible entity' for this minor change application pursuant to section 78A of the *Planning Act*.

In summary, the proposed changes involve consolidation of the internal rooming accommodation to reduce the number of units from 70 units (with 72 beds) to 51 units (with 51 beds). The rate of lockable bicycle spaces has been reduced to a compliant 26 spaces for 52 units (at a Planning Scheme rate of 1 space per 2 rooms). Very minor changes are proposed, including an indiscernible increase in total height of 200mm due to the lift lid and minor internal reconfiguration of the areas of rooms on ground floor. The external appearance of the building remains consistent with the approval, with materials and variation remaining largely unchanged. Vehicle and pedestrian access is unchanged, with an on-site service bay provided wholly within the site with a compliant 3.5m high clearance and 6.4m service bay length. The rear deep planting area is now provided as a single consolidated planting space with the retaining wall removed, in accordance with Council's mark up in red on the current approved plans. The balance of landscaping provision remains unchanged. Civil servicing and refuse collection is unchanged.

The proposed development retains compliance with the relevant outcomes of the *Brisbane City Plan 2014* (the Planning Scheme). We therefore request approval subject to reasonable and relevant conditions.

We provide further information in the following sections.

1 EXISTING APPROVAL

The original Development Approval was issued by BCC on 28 February 2019 (BCC ref: A004902796).

Subsequent minor change applications were approved by BCC on 3 February 2019 (BCC ref: A006620499) and 20 November 2025 (BCC ref: A006841446).

The current Development Approval is summarised as follows:

- 9 storey building (plus rooftop communal area) comprising 70 rooming accommodation units (with 72 beds)
- Shared ground level communal area and rooftop communal area
- Ground-level retail for a Food and drink outlet fronting Little Edward Street
- 44 bicycle parking spaces, in excess of the minimum rate under the Planning Scheme
- Architecturally designed, attractive, high quality building façade incorporating variation in materials and colours
- Vehicular driveway and on-site service vehicle area
- Repositioning of on-street car parking space
- Deep planting area at rear of Level 01 and containerised planting on Level 02 and rooftop
- Zero car parking spaces, in compliance with the maximum rate prescribed under the Planning Scheme

The original development approval stated that the currency period was to end on 30 May 2025. The approval benefits from three ministerial extensions granted by the State Planning Minister under section 275R of the *Planning Act 2016* in response to the COVID event in 2020 to 2022. These ministerial extensions confer two year extension in total. Accordingly, the approval remains current, with the currency period end date now being **30 May 2027**.

2 PROPOSED MINOR CHANGE

The proposed Minor Change is outlined as follows:

- Consolidation of rooming accommodation units, including:
 - Level 02 + 03: Reduction from 11 units (12 beds) to 9 units (9 beds)
 - Levels 04 – 06: Reduction from 8 units to 5 units
 - Levels 07 – 09: Reduction from 8 units to 6 units
- Very minor adjustments to the ground level (Level 01), retaining the communal area with balcony and other communal facilities, albeit with minor adjustment to areas
- Reduction to 26 lockable bicycle parking spaces, compliant with the minimum Planning Scheme rate of 1 space per 2 rooms (minimum rate of 25.5 spaces)
- No changes to vehicle access, with the proposed driveway compliant for service vehicle access and 6.4m length on-site servicing area with 3.5m of clearance (in accordance with approval conditions) allowing for vehicles to park wholly within the site
- No changes to the retail tenancy for a Food and drink outlet on ground level fronting Little Edward Street, with minor decrease in size by 0.4m²
- No changes to the pedestrian access from Little Edward Street
- No changes to the refuse storage room configuration or collection strategy
- Consolidation of the rear deep planting with removal of the retaining wall, in accordance with Council's mark up in red on the current approved plans
- No changes to the external appearance of the building, including materials and variation in colours

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- Retained as 9 storeys plus rooftop building, with a very minor and indiscernible 200mm increase in the lift overrun
- No changes to the civil servicing strategy, including water supply, sewer reticulation, stormwater quantity management, electricity, or telecommunications
- No changes to the repositioned on-street car parking spaces to accommodate the approved crossover

The proposed minor change retains compliance with the Planning Scheme.

The proposed development is for compliant, architecturally-designed 9 storey rooming accommodation building which provides valuable infill accommodation options in the inner-city suburb of Spring Hill. The external design of the building is aesthetically attractive, comprising a high-quality design which incorporates variation in materials and colours.

We provide further information in the sections below.

Refer **Figure 2** for a render of the proposed building.



Figure 1 Proposed Render (Cottee Parker)

2.1 Unit Yield Consolidation / Reduction

The proposed Minor Change seeks approval for a consolidation of the internal rooming accommodation units, resulting in a from 70 units (72 beds) to 51 units (51 beds).

We provide a summary of the changes to the room types and additional yield in **Table 1**.

The reduces units will result in changes Infrastructure Charges. We provide an estimate in section 5.4 below.

Table 1 Simplified Breakdown of Room Type / Yield Changes

Level	Approved Beds	Proposed Beds
2	12 (including 2 two-bed units)	9
3	12 (including 2 two-bed units)	9
4	8	5
5	8	5
6	8	5
7	8	6
8	8	6
9	8	6
Total	72 beds (70 units)	51 beds (51 units)

2.2 Bicycle Parking

The current approval provides 44 lockable bicycle parking spaces, which is excess of the minimum requirement of 1 space per 2 units under Table 21 of the Transport, Access, Parking, and Servicing (TAPS) Planning Scheme Policy (PSP) under the Planning Scheme. The proposed minor change seeks to consolidate the bicycle parking spaces to the minimum required rate under the TAPS PSP. 26 lockable bicycle parking spaces are proposed, compliant with the minimum number for the proposed 51 units.

Access to the bicycle storage room is unchanged from the current approval. The size of the bicycle storage room is suitable for easy storage and access.

The proposed 26 lockable bicycle parking spaces remains compliant with the Planning Scheme.

Planning Scheme Rate		Proposed	Comment
<i>Hostel including off-site student accommodation: 1 lockable bicycle parking space for every 2 rooms</i>	Current Approval	44 lockable bicycle parking spaces for 70 rooms	Compliant
	Proposed Minor Change	26 lockable bicycle parking spaces for 51 rooms	Compliant

2.3 Rear Deep Planting Area

The current approval includes a deep planting area at the rear of the ground floor. Council marked up the approved plans in red to state that the landscaping in this area is to be provided in one consolidated area (i.e. no retaining wall as shown), provide columnar screening trees which can achieve a minimum height of 5m at maturity with understorey shrubs and groundcovers, and for the soil level to be at the height of the lower retaining wall to maintain natural light access to the windows of the building.

In compliance with Council's mark up in red, the proposed minor change now shows this deep planting area with the retaining wall removed and positioned so that the soil is at the height of the lower retaining wall. We request suitable conditions or mark up in red on the approved plans by Council, regarding landscaping provision in this deep planting area (i.e. stating that columnar screening trees to 5m and understorey shrubs and groundcovers are to be provided).

This deep planting area is now compliant with Council's request and no further changes are required.

3 MINOR CHANGE STATUS

The proposed change to the development approval is consistent with the definition of a ‘minor change’ under the *Planning Act 2016* as outlined below:

3.1 Minor change definition

Table 2 Response to Minor Change Definition

<i>Under Schedule 2 of the Planning Act 2016, a minor change (for a development approval) means a change that:</i>	Response
(i) <i>would not result in substantially different development; and</i>	Demonstration that the change does not constitute substantially difference development is provided section 3.2 below.
(ii) <i>if a development application for the development, including the change, were made when the change application is made would not cause</i>	
(A) <i>the inclusion of prohibited development in the application; or</i>	The proposed changes are for the same land uses as previously approved and do not include prohibited development.
(B) <i>referral to a referral agency, other than to the chief executive, if there were no referral agencies for the development application; or</i>	The proposed changes do not trigger any referrals.
(C) <i>referral to extra referral agencies, other than to the chief executive; or</i>	The proposed changes do not trigger any referrals.
(D) <i>a referral agency, in assessing the application under section 55, to assess the application against, or have regard to, a matter, other than a matter the referral agency must have assessed the application against, or had regard to, when the application was made; or</i>	The proposed changes do not trigger any referrals.
(E) <i>public notification if public notification was not required for the development application.</i>	The proposed changes do not trigger impact assessment and therefore do not require public notification to occur.

3.2 Substantially different development criteria

Table 3 Response to Substantially different development criteria

<i>Under Schedule 1 of the Development Assessment rules, a change may be considered to result in substantially different development if any of the following apply to the change:</i>	Response
(a) involves a new use;	The proposed change is for the same land uses previously approved and does not introduce any new land uses.
(b) results in the application applying to a new parcel of land; or	The proposed change is not being applied over any new land parcels as previously approved.
(c) dramatically changes the built form in terms of scale, bulk and appearance; or	The proposed changes will result in an identical development footprint as previously approved. The application does not include any changes to the external design of the building and will appear virtually identical from the streetscape. Proposed changes are to the internal building only.

(d) changes the ability of the proposed development to operate as intended; or	The proposed changes will not impact the ability of the development to operate as intended. The approved crossover, driveway, and on-site servicing area is retained, allowing for service vehicles to park wholly within the site while servicing is undertaken. Occupants of the building, guests, employees, and other persons using the building will access via the ground-level pedestrian entry either on-foot or by cycling. The number of lockable bicycle parking spaces is reduced, but remains compliant with the minimum rate under the Planning Scheme. The ground-level retail will operate unchanged.
(e) removes a component that is integral to the operation of the development; or	The proposed change does not remove any components that is integral to the operation of the development. The proposed change is for consolidation of internal units only.
(f) significantly impacts on traffic flow and the transport network, such as increasing traffic to the site; or	The number of lockable bicycle parking spaces is reduced but remains compliant with the minimum rate under the Planning Scheme. Car parking spaces are not provided, as per the current approval, which is compliant with the <u>maximum</u> rate under the Planning Scheme. The on-site car parking space will be repositioned slightly to accommodate the new vehicle crossover, as per the current approval. Overall, there will be no resultant changes to the transport network or impact on traffic flow.
(g) introduces new impacts or increase the severity of known impacts; or	The proposed changes do not introduce new impacts or increase the severity of known impacts.
(h) removes an incentive or offset component that would have balanced a negative impact of the development; or	The proposed changes do not remove an incentive or offset component that would have balanced a negative impact of the development.
(i) impacts on infrastructure provisions.	The proposed changes do not impact on infrastructure provisions.

4 REFERRAL AGENCIES

A review of schedules 9 and 10 of the *Planning Regulation 2017* confirms that the proposed development application does not require referral. No referral agencies were triggered by the original application and therefore there are no affected entities.

5 AMENDMENTS TO THE DECISION NOTICE

5.1 Description of Development

No changes are proposed to the description of development, which is sought to remain unchanged as follows:

- Development Permit for Material Change of Use for Rooming Accommodation
- Development Permit for Material Change of Use for Health Care Service, Office, Shop, and Food and drink outlet

5.2 Approved drawings and documents

We propose the following amendments to the list of approved drawings and documents, including the **insertions** and **deletions**, provided in **Table 4** below.

All other approved drawings and documents not listed below are proposed to remain unchanged unless agreed to by the applicant. We request a copy of draft conditions before the application is decided.

Table 4 Requested Amendments to Drawings and Documents

Drawing or Document	Number	Plan Date
DA_Site Plan 1-100	DA 1001-03	19/08/2025
DA_Site Plan 1-100	DA 1001 DA05	26/05/2026
DA_Level 01 (Ground)	DA 2001-DA03	19/08/2025
DA_Level 01 (Ground)	DA 2001 DA05	26/05/2026
DA_Level 02	DA 2002-DA03	19/08/2025
DA_Level 02	DA 2002 DA04	26/05/2026
DA_Level 03	DA 2003-DA03	19/08/2025
DA_Level 03	DA 2003 DA04	26/05/2026
DA_Level 04	DA 2004-DA03	19/08/2025
DA_Level 04	DA 2004 DA04	26/05/2026
DA_Level 05-Level 06	DA 2005 DA04	26/05/2026
DA_Typical Level 05-Level 09	DA 2005-DA03	19/08/2025
DA_Level 07-Level 09	DA 2007 DA04	26/05/2026
DA_Level 10 (Rooftop)	DA 2010-DA03	19/08/2025
DA_Level 10 (Rooftop)	DA 2010 DA04	26/05/2026
DA_Level Roof	DA 2011-DA03	19/08/2025
DA_Level Roof	DA 2011 DA04	26/05/2026
DA-East & West Elevation	DA 3001-DA03	19/08/2025
DA_East & West Elevation	DA 3001 DA04	26/05/2026
DA-North Elevation	DA 3002-DA03	19/08/2025
DA_North Elevation	DA 3002 DA04	26/05/2026
DA-South Elevation	DA 3003-DA03	19/08/2025
DA_South Elevation	DA 3003 DA04	26/05/2026
DA-Section A	DA 3101-DA03	19/08/2025
DA_Section A	DA 3101 DA05	26/05/2026
DA-Section B	DA 3102-DA03	19/08/2025
DA_Section B	DA 3102 DA05	26/05/2026
DA_Building Interface	DA 1065-DA03	19/08/2025
DA_Building Interface	DA 1065 DA04	26/05/2026
DA_Building Interface	DA 1066-DA03	19/08/2025
DA_Building Interface	DA 1066 DA05	26/05/2026
DA_Proposed Street Parking Amendment	DA 1068-DA03	19/08/2025
DA_Proposed Street Parking Amendment	DA 1068 DA05	26/05/2026
DA_Refuse Compliance	DA 1067-DA03	19/08/2025
DA_Refuse Compliance	DA 1067 DA06	26/05/2026
DA_Refuse Compliance w/out doors	DA 1069 DA06	26/05/2026
DA_GFA Summary	DA 2801-DA03	19/08/2025
DA_GFA Summary	DA 2801 DA04	19/08/2026
DA-Site Cover & Communal Space	DA 2810-DA03	19/08/2025
DA_Site Cover & Communal Space	DA 2810 DA04	26/05/2026
DA-GBA Summary	DA 2811-DA03	19/08/2025
DA_GBA Summary	DA 2811 DA04	26/05/2026

5.3 Conditions of approval

We propose the following amendments to the list of approved drawings and documents, including the **insertions** and **deletions**, provided in **Table 5** below.

All other conditions not listed below are proposed to remain unchanged unless agreed to by the applicant. We request a copy of draft conditions before the application is decided.

Table 5 Requested Amendments to Conditions of approval

Condition	Amendments	Reason for Amendment
28	Access, Grades, Manoeuvring, Carparks, Signs and Line Marking iii. Provide 44 a minimum of 26 bicycle parking spaces	Refer section 2.2

5.4 Charges & Fees

5.4.1 Infrastructure Charges

The proposed Minor Change involves a reduction from 70 units / 72 beds to 51 units / 51 beds, therefore requiring a recalculation of infrastructure charges. We provide an estimated calculation in **Table 7** below.

The retail component of the development remains unchanged in size and therefore attracts no changes in the charge.

We request a revised Infrastructure Charges Notice (ICN) to reflect the updated plans of development.

Table 6 Calculation of Infrastructure Charges

Category	Adopted Charge per Unit	Demand (Approved)	Charge (Approved)	Demand (Proposed)	Charge (Proposed)
<i>Extra Demand</i>					
Rooming Accommodation (Off-site student accommodation) – Suite with 1 bedroom	\$4,047.98	50	\$202,399.00	50	\$202,399.00
Rooming Accommodation (Off-site student accommodation) – Suite with 2 bed units	\$8,095.96	2	\$16,191.92	0	\$0
Rooming Accommodation (Off-site student accommodation) – Bedroom that is not within a suite	\$6,437.96	18	\$115,883.28	1	\$6,437.96
<i>Credit</i>					
Lot - Residential			\$14,167.95		\$14,167.95
Total			\$320,306.25		\$208,936.96

5.4.2 Development Assessment Fee

We understand that the relevant fee in accordance with the current Development Assessment and Compliance Fees 2025-26 is the 'Development assessment area charge/reconfiguration' of **\$3,432.00**.

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6 SUPPORTING INFORMATION

The proposed changes do not require additional supporting documentation with the exception of revised architectural proposal plans.

As discussed above, there are no proposed or consequential changes to technical reporting, therefore:

- Revised stormwater management reporting is not required as the impervious area of the development remains unchanged
- Revised traffic / access reporting or plans is not required as access to/from the site remains unchanged, the size and location of the driveway is unchanged, the size and location of the on-site servicing area is largely unchanged and retains the minimum required 6.4m length and 3.5m high clearance
- The civil servicing strategy remains unchanged, including sewer, water, electricity, and telecommunications
- Waste management strategy remains unchanged, with the size and location of the refuse rooms and the collection strategy (involving a service vehicle parking wholly within the site) suitable for the use

To support the proposed changes, please find attached the following information, which satisfies the requirements of Section 79 of the *Planning Act 2016*:

- **Attachment A:** DA Form 5, Owner's consent, and Current Title Search
- **Attachment B:** Amended Architectural Proposal Plans

We look forward to continuing working with you on this development. In the meantime, please don't hesitate to contact Stephen Mason on 0407 968 115 or Jackson Richardson on 3539 9539.

Yours sincerely,
for RPS AAP Consulting Pty Ltd



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Planner

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enc: As above