

31 July 2026

The Assessment Manager
Brisbane City Council
GPO Box 1434
Brisbane, QLD, 4000

Dear Sir/Madam,

Request for a Change (Minor) to Development Permit at 39 Laura Street, Lutwyche (Council reference: A006320813)

In accordance with Section 78 of the Planning Act 2016 ('the Act') and on behalf of *Aura Holdings Pty Ltd* ('the Applicant'), please take this as the Applicant's request for a Change (Minor) to the development permit at 39 Laura Street, Lutwyche.

The approval subject to this change application was approved by Brisbane City Council, by way of a Negotiated Decision Notice ('NDN') Development Permit for a Material Change of Use on 18 October 2017 (Council Reference: A004628058).

A Change to this approval was subsequently decided by Council on 15 March 2024 which represents the most recent amendment decision made by Council in relation to the proposed works on site (Council Reference: A006320813). As such, this Change (Minor) seeks to amend this decision to accommodate additional changes to the approved Retirement Facility development.

The key proposed changes are identified below:

- Removal of Building C;
- Removal of a staged approach, with development to be delivered in one development cycle;
- Minor amendments to the design and layout.

Further details in respect of the proposed changes are provided in the forthcoming sections of this Cover Letter.

The proposed changes have been driven by the change of ownership of the site, and a revised scheme which the new owners believe will meet the market demand whilst being economically feasible to develop. Significantly, funding has been obtained for this project and this amended development approval is the only impediment

This change application is accompanied by the following material:

- **Appendix A** – Existing Approval Documentation;
- **Appendix B** – Title and CLR Search Results;
- **Appendix C** – DA Form 5;
- **Appendix D** – Owners Consent;
- **Appendix E** – Revised Architectural Plans
- **Appendix F** – Engineering Services and Infrastructure Report
- **Appendix G** – Concept Landscape Package
- **Appendix H** – Noise Impact Assessment
- **Appendix I** – Pedestrian Wind Environment Statement
- **Appendix J** – Site Based Stormwater Management Memo
- **Appendix K** – Transport Engineering Memo
- **Appendix L** – Operational Waste Management Plan

1 Background

1.1 Key Site Details

Details of the site are summarised in **Table 1** below. An extract of recent aerial photography is also shown in **Figure 1** below.

Table 1 - Key Site Details

Site Address	32, 33, 34, 35, 36, 37 & 39 Laura Street & 39 Lowerson Street, Lutwyche, Queensland, 4030
Real Property Description	Lots 18, 19, 20, 21, 22 & 23 RP19116; Lot 15 RP19115 & Lot 18 RP19100
Total Site Area	Approx. 7,900m ²
Local Government Area	Brisbane City Council
Local Categorising Instrument	Brisbane City Plan (2014)
Zone – Refer Figure 2	High Density Residential Zone (HRD1 – Up to 8 Storeys)
Neighbourhood Plan	Lutwyche Road Corridor Neighbourhood Plan ▪ Lutwyche Centre Precinct (NPP-001) – Lutwyche Centre Residential Corridor Sub-Precinct (NPP-001b)
Road Frontage	▪ Approx. 123m to Laura Street (Neighbourhood Road); ▪ Approx. 7m to East Street (Neighbourhood Road); ▪ Approx. 4m to Conon Street (Neighbourhood Road).
Easements	Nil

Figure 1 – Site aerial



Source: Nearmaps (adapted by Urbis)

Figure 2 – Zoning Map



Source: Brisbane City Council (adapted by Urbis)

1.2 Site Location

The site is located within the suburb of Lutwyche, one of Brisbane's inner-northern suburbs approximately 4 kilometres to the north of Brisbane's Central Business District ('CBD'). A summary of the development which immediately surrounds the site is identified in **Table 2** and visually in **Figure 1**.

Table 2 – Summary of surrounding development

Direction	
North	Primarily low-medium rise residential development
South	Primarily low-medium rise residential development
East	Primarily low-medium rise residential development, including emerging 4 storey mid-rise residential developments
West	Primarily low-medium rise residential development (immediately) & Centre activity uses along Lutwyche Road

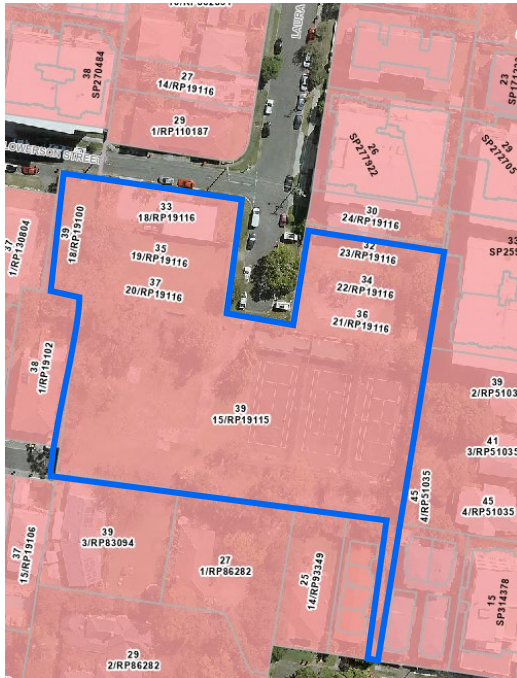
1.3 Key Planning Scheme Designations

Details of the site's Planning Scheme designations are summarised below in **Table 3**. An extract of the key overlays is identified in **Figures 3 and 4** below.

Table 3 – Summary of key Planning Scheme designations

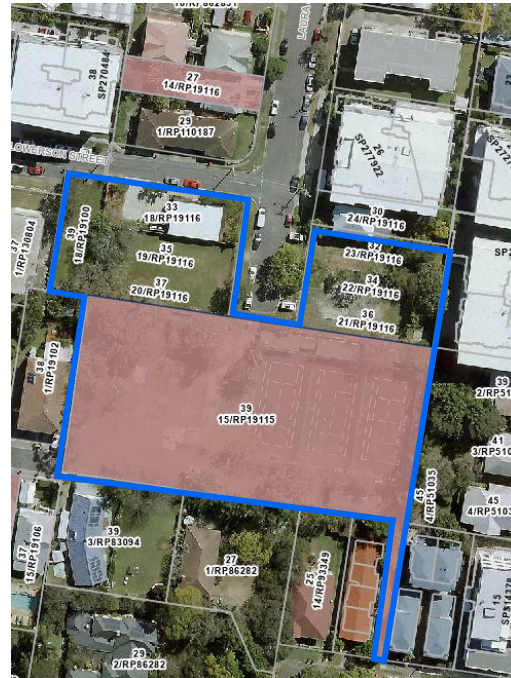
Planning Scheme element	
Zone	High Density Residential Zone (HRD1 – Up to 8 Storeys)
Neighbourhood Plan	Lutwyche Road Corridor Neighbourhood Plan ▪ Lutwyche Centre Precinct (NPP-001) – Lutwyche Centre Residential Corridor Sub-Precinct (NPP-001b)
Key Overlays	▪ Airport Environs Overlay ▪ Community Purposes Network Overlay ▪ Critical Infrastructure and Movement Network Overlay ▪ Dwelling House Corridor Overlay ▪ Pre-1911 Building Overlay ▪ Road Hierarchy Overlay ▪ Streetscape Hierarchy Overlay

Figure 3 – Dwelling House Character overlay



Source: Brisbane City Council (adapted by Urbis)

Figure 4 – Pre-1911 Building Overlay



Source: Brisbane City Council (adapted by Urbis)

2 Approval History

The site has been subject to a number of Development Approvals. The list of previous Development Approvals publicly accessible via Council's development.i online portal are listed below in **Table 4**.

Table 4 – Summary of Development Approval History

Approval Reference	Approval Date	Description of Approval
A004628058	18 October 2017	Development Permit for a Material Change of Use for a Retirement Facility
A006320813	20 March 2024	Other Change to Development Permit A004628058, the key changes include: - Increased overall building height to 10 storeys - Redesign from single tower to tri-tower design
A006898795	04 December 2025	Extension of Currency Period associated with A004628058 Currency period extended through to 18 October 2029

3 Pre-lodgement Engagement

The Applicant has engaged with Council regarding the proposed changes, including a pre-lodgement meeting which was held on 1 April 2026. The key matters discussed in the meeting are identified in **Table 5** below.

Table 5 – Summary of Pre-lodgement meeting discussion

Discussion item	Applicant response
1. The planning approval pathway: Council confirmed that the proposal was suitable to be assessed as a Minor Change, to the extent in which the revised development remains generally consistent with the original approval.	The proposed changes are generally consistent with the original approval and are therefore suitable to proceed as a Minor Change. This is explained further in this letter.
2. Built form considerations: Council identified that the removal of Building C has merit in terms of reducing impacts to the surrounding properties. Notwithstanding this, the revised development needs to ensure that key development parameters, such as deep planting, balcony sizes, setbacks etc should be maintained generally in accordance with the approval.	The proposed development maintains compliance with key development parameters, such as: ▪ The development maintains compliant deep planting ▪ The development reduces overall site coverage ▪ The development maintains compliance with communal open space requirements, and increases the quality and quantity of the internal and external spaces ▪ The site servicing and vehicle accesses remain generally in accordance with the approval ▪ The provision of carparking is compliant ▪ The development is generally contained within the approved building envelope and maintains setbacks which are generally consistent with the approval
3. Traffic and parking: Council acknowledged that the revised development will require a reconsideration of the approved basement levels and that tandem carparking spaces may be required.	The development has been designed to accommodate compliant vehicle carparking.

4 Nature of Requested Changes

4.1 Summary

The proposal seeks changes to reconfigure the retirement facility development on the site. The site has recently been purchased by the Applicant from the previous landowner who secured approval for a 10 storey retirement facility, comprising 253 'independent living units' (ILUs) and an additional 12 'care suites'. A total of 265 units were approved as part of the original project.

Following the purchase, the applicant has identified changes required to modernise the concept and reflect their specific operation model. Most notably, the north-eastern building has been removed which will reduce the overall yield of the development, and 'care suites' are no longer proposed.

Further details of the proposed changes are provided in the forthcoming sections of this report.

4.2 Removal of 'Building C'

The Applicant seeks to remove the previously approved 'Building C' which lies in the north-eastern corner of the site and is approved to be constructed over Lots 21, 22 and 23 RP19116 and part of Lot 15 RP19115. The building contained 79 ILUs across its' 10 floors, as well as resident carparking in the basement level. Importantly, Building C did not include any communal amenities or facilities and only included ILUs. Please refer **Figures 5 & 6** below which identifies Building C which is sought to be removed.

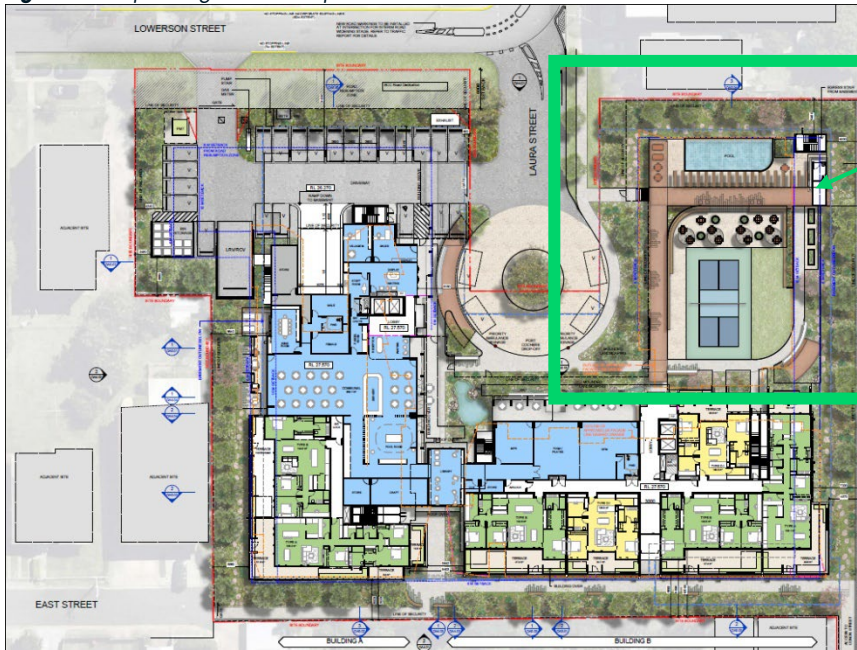
In place of 'Building C', the Applicant seeks to landscape and embellish the site with high quality communal open space. A new swimming pool and activity court are intended to be delivered in concert with a variety of formal and informal seating areas, lawned spaces and densely landscaped gardens for the exclusive use of residents and visitors to the retirement facility (refer **Figure 7**). Relevantly, these new communal open spaces have been designed with generous setbacks and dense landscaping buffers to the surrounding dwellings to improve the interface with the adjoining residents. These spaces complement the indoor communal spaces which have been redesigned but remain generally in accordance with those spaces originally approved.

Figure 5 – Approved ground floor plan



Source: MarchesePartners / Life^{3A} (adapted by Urbis)

Figure 6 – Proposed ground floor plan



Former Building C location to be repurposed for landscaping / communal amenities

Source: MarchesePartners / Life^{3A} (adapted by Urbis)

Figure 7 – Proposed Communal Open Space (COS)



Source: Place Design Group

4.3 Architectural Changes

The retirement facility has undergone some architectural changes in response to the removal of Building C and further detailed design investigations. These changes represent a refinement of the approved development while maintaining the overall building height and other key development parameters. Buildings A and B have been refined in terms of their facades, which include additional façade articulation, operable screening devices, landscaping planters, balcony arrangements, and floor plate layouts, while generally remaining within the approved building envelope.

The material palette has also been refined through the continued use of contemporary materials and finishes, including masonry elements, textured concrete finishes, lightweight cladding and aluminium screening, which collectively contribute to a high-quality architectural outcome. Relevantly, the proposed amendments to the design do not alter the fundamental character or operation of the approved development.

Render graphics have been extracted from the revised architectural package and are provided below as **Figures 8, 9 and 10** below.

Figure 8 – Internal perspective to ground floor porte-cochere & entrance portal



Source: MarchesePartners / Life^{3A}

Figure 9 – Internal perspective to ground floor porte-cochere & entrance portal



Source: MarchesePartners / Life^{3A}

Figure 10 – Perspective approaching from Lowerson Street



Source: MarchesePartners / Life^{3A}

4.4 Changes to key development metrics

As a result of the removal of 'Building C' and the design changes, the overall yield of the development has been reduced. Consequently, the revised scheme also seeks to remove one of the basement parking levels as all required carparking can be consolidated into a single basement.

A summary of the proposed changes in terms of the key development metrics is provided below in **Table 6**.

Table 6 – Summary of changes to overall development parameters

Key Elements	Approved	Proposed
Defined Land Uses	Retirement Facility	Retirement Facility (no change)
Building Height	10 storeys	10 storeys (no change)
Units	253 ILA units 12 care units 265 units total	130 ILA units total (~135 units)
Site Cover	53.9%	37.9% (~16%)
Communal Open Space	4,471m ²	4,759m² (+288m²)
Deep Planting	1,423m ² (17.3% of site area)	1,086m² (13.2% of site area)

Car Parking	192 resident spaces 67 staff / visitor spaces 259 spaces total	161 resident spaces 30 staff / visitor spaces 191 spaces total (-68 spaces)
Servicing	Servicing at ground level in dedicated LRV/RCV bay	Servicing at ground level in dedicated LRV/RCV bay (no change)
Vehicular Access	2x vehicular accesses from Laura Street	2x vehicular accesses from Laura Street (no change)

4.5 Staging

The previous development was intended to be delivered in three (3) stages. With the removal of Building C, the development is now intended to be delivered in one stage.

5 Specialist Reporting

The proposed changes have been supported by the following specialist consultant reports.

5.1 Engineering Services and Infrastructure Report

The Engineering Services and Infrastructure Report assesses the servicing and infrastructure requirements associated with the amended retirement facility development. The reporting confirms that the proposal can continue to be serviced generally in accordance with the previously approved scheme. The report reviews site access, earthworks, flooding and overland flow, stormwater management, water supply, sewerage, electrical, communications and gas infrastructure, and identifies that the proposed changes are largely limited to a reduction in built form and development yield rather than any fundamental changes to servicing arrangements.

The assessment concludes that there is an available and feasible infrastructure solution to service the amended development. Existing and previously approved water and sewer servicing strategies remain capable of supporting the proposal (subject to updated approvals from Urban Utilities), stormwater management can be accommodated through on-site detention and treatment systems (which are further discussed in the stormwater management plan), and utility services including electricity, telecommunications and gas are available to the site. Overall, the report demonstrates that the amended retirement facility can be appropriately serviced and that no significant infrastructure constraints prevent the proposed minor change from proceeding.

5.2 Concept Landscape Package

The Landscape Concept Package outlines a substantial landscape strategy that responds to the site's history as the former Fancutts Tennis Centre while supporting contemporary retirement living. The proposal provides a range of communal outdoor facilities including landscaped gathering spaces, walking paths, community gardens, a pool, pickleball court, seating areas and roof gardens, with an emphasis on resident wellbeing, recreation and social interaction.

The report confirms a deep planting provision of 1,094m², representing 13.34% of the site, and concludes that the landscape design achieves the relevant landscape code outcomes through generous planting, appropriate soil depths, CPTED principles and long-term landscape sustainability measures. Relevantly, the

deep planting provided maintains steadfast compliance with the Acceptable Outcome which seeks to ensure that 10% of the site is dedicated to deep planting.

Whilst this represents a slight reduction when compared with the approved development, the revised scheme provides an improved overall landscape outcome. This is largely attributable to the removal of Building C, which enables a broader distribution of landscaped areas across the site, including additional surface planting and extensive containerised planting integrated into the building façades. Although some of these areas do not strictly meet the definition of deep planting, they contribute positively to the overall landscape quality, visual amenity and resident experience. Accordingly, whilst the proposal involves a modest reduction in defined deep planting, the revised landscape strategy delivers an improved overall landscape outcome for the site.

5.3 Noise Impact Assessment

The Noise Impact Assessment considers the potential acoustic impacts associated with the amended retirement village development, including vehicle movements, loading activities, mechanical plant and communal recreation facilities. The assessment establishes relevant acoustic criteria in accordance with Brisbane City Plan 2014, the Environmental Protection Act 1994, the Environmental Protection (Noise) Policy 2019 and relevant Australian Standards. Existing noise monitoring and detailed modelling were undertaken to assess likely impacts on nearby sensitive receivers.

The assessment concludes that the proposed development is capable of complying with applicable acoustic requirements, subject to the implementation of recommended mitigation measures. The report finds that loading dock operations, communal facilities and indoor activities can achieve acceptable acoustic outcomes, while potential impacts associated with visitor parking and mechanical plant can be appropriately managed through operational controls and detailed design measures. Overall, the report demonstrates that the amended development is acoustically feasible and can operate without generating significant adverse noise impacts on surrounding properties.

5.4 Pedestrian Wind Environment Statement

The Pedestrian Wind Assessment reviewed the likely wind conditions within and around the amended development, including ground-level communal areas, balconies and rooftop spaces. The assessment found that the development incorporates a range of wind mitigation measures and is expected to provide acceptable conditions for most outdoor areas.

The report recommends retaining proposed landscaping, awnings, planter boxes, screens and balustrades to further manage localised wind impacts. Subject to these measures being incorporated, the assessment concludes that the proposal will satisfy applicable pedestrian comfort and safety criteria and is not expected to create significant wind impacts on adjoining properties.

5.5 Site Based Stormwater Management Memo

The Site Based Stormwater Management Memo assesses the proposed stormwater quantity and quality outcomes associated with the amended retirement village development. The report confirms that the overall stormwater management approach remains generally consistent with the previously approved scheme, with stormwater directed to lawful discharge points at Laura Street, Lowerson Street and Conon Street. Detailed hydraulic modelling demonstrates that stormwater runoff from the primary south-eastern catchment can be effectively managed through an on-site detention system, ensuring the development is protected from major storm events and that post-development discharge rates are appropriately controlled.

The assessment concludes that the proposed development can achieve both stormwater quantity and water quality requirements through the provision of a 300m³ underground detention tank and a stormwater treatment train incorporating AtlanTraps, AtlanFilters and landscape buffers. MUSIC modelling confirms compliance with the applicable State Planning Policy water quality objectives for total suspended solids, phosphorus, nitrogen and gross pollutants, while the detention system reduces post-development flows to at or below pre-development conditions. Overall, the report demonstrates that the amended development can be appropriately serviced and is capable of achieving compliant stormwater management outcomes.

5.6 Transport Engineering Memo

The Traffic Impact Statement assesses the proposed minor changes in terms of the reduced residential yield and consolidated basement parking level. The report confirms that the access arrangements remain unchanged and that servicing requirements have reduced in line with the reduced development yield.

The assessment concludes that the amended proposal maintains an appropriate parking supply, complies with most parking design requirements, retains suitable access arrangements and is expected to generate less traffic than the approved scheme.

5.7 Operational Waste Management Plan

The Operational Waste Management Plan assesses the waste generation, storage, collection and servicing requirements for the amended retirement living development. The report has been prepared in accordance with Brisbane City Council's refuse planning requirements and confirms that adequate waste storage, recycling facilities, refuse chutes, servicing areas and collection arrangements can be provided to accommodate the development's operational needs. Dedicated refuse storage areas are proposed within each building, with waste transferred to a shared collection area for servicing by a private waste contractor.

The assessment concludes that the proposed waste management strategy achieves the relevant planning scheme requirements and can operate safely and efficiently without creating unreasonable amenity impacts. The report confirms that sufficient waste and recycling capacity is provided, appropriate collection vehicle access and manoeuvring can be achieved on site, and all refuse storage and servicing facilities have been designed to meet Council's operational and performance standards. Overall, the development is capable of accommodating a compliant and functional waste management system.

6 Proposed Changes to Approval

The proposed Changes sought require amendments to the Conditions of Approval granted in accordance with the most recent Change decision in relation to this development (Council ref: A006320813). In addition to changes to the conditions, the amended architectural plans and specialist reporting documentation are also required to be included. Lastly, considering the development is no longer sought to be developed in stages, the current suite of conditions will need to be consolidated into one singular schedule of conditions.

The following documents are requested to be incorporated into the approval package. Please refer **Table 8**.

Table 7 – Requested document changes

Document title	Date	Revision
Architectural Plans, prepared by Marchese (referred to as Appendix E)	23 July 2026	–

Engineering Services and Infrastructure Report, prepared by Stantec (referred to as Appendix F)	24 July 2026	Revision E
Concept Landscape Package, prepared by Place Design Group (referred to as Appendix G)	24 July 2026	Revision 2
Noise Impact Assessment, prepared by Stantec (referred to as Appendix H)	23 July 2026	Revision 003
Pedestrian Wind Environment Statement, prepared by Windtech (referred to as Appendix I)	24 July 2026	Revision 3
Site Based Stormwater Management Memo, prepared by Stantec (referred to as Appendix J)	24 July 2026	Revision F
Transport Engineering Report, prepared by Colliers (referred to as Appendix K)	21 July 2026	Revision 1
Operational Waste Management Plan, prepared by Colliers (referred to as Appendix L)	23 July 2026	Revision 2

The following conditions identified in **Table 9** are required to be amended in accordance with the proposed changes. More broadly, the proposal seeks approval for the development to

Table 8 - Requested amendments to Conditions of Approval

Condition #	Condition	Requested Change	Rationale
10 – Extent of the permit	This approval is limited to the following uses: - Retirement Facility (Independent Living Units and Care Suites)	<i>This approval is limited to the following uses: - Retirement Facility (Independent Living Units and Care Suites)</i>	The condition should be amended, as the proposal no longer seeks approval for care suites.
48 – Access, Grades, Manoeuvring, Carparks, Signs and Line Marking	Construct 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: iii. Parking on the site for 190 resident cars, and 69 visitor/staff cars with 6 of the visitor parking spaces for people with disabilities, and for the loading and unloading of vehicle(s) within the site. 6 of the	<i>Construct 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: iii. Parking on the site for 190 161 resident cars, and 6930 visitor/staff cars with 63 of the visitor parking spaces for people with disabilities, and for the loading and unloading of vehicle(s) within the site. 6 of the</i>	The carparking condition should be amended in accordance with amended development scheme.

parking spaces on the Ground level are to be reserved for staff as indicated on the APPROVED DRAWING numbered 21009/DA3.03 Rev. M (amended in red 29/02/2024). There must be a minimum total of 259 car parking spaces on the site. Provide appropriate signage/linemarking nominating the small car parking spaces.	parking spaces on the Ground level are to be reserved for staff as indicated on the APPROVED DRAWING numbered 21009/DA3.03 Rev. M (amended in red 29/02/2024). There must be a minimum total of 259 191 car parking spaces on the site. Provide appropriate signage/linemarking nominating the small car parking spaces.
...	...

7 Assessment of Minor Change

7.1 Schedule 2 Assessment Criteria

7.1.1 Substantially Different Development Criteria

Schedule 2 of *The Planning Act 2016* outlines the definition of a Minor Change for a development approval (see below). Each of the proposed changes as outlined above have been assessed against these criteria, as follows:

Schedule 2 - 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 had regard to, when the application was made; or

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

Each of the proposed changes has been assessed against these criteria, as set out in the following sections.

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 the *Development Assessment Rules*, Schedule 1, which sets out the substantially different development 'test'.

An assessment of the proposed changes against the substantially different development criteria in the *Development Assessment Rules* is included in the **Table 10** below.

Table 9 – Assessment of Substantially Different Development Criteria

Guideline Criteria	Response
Involves a new use	The proposal does not introduce a new use to the approved development. The proposed use is consistent with the approved use on site – Retirement Facility.
Results in the application applying to a new parcel of land.	No new parcels of land are introduced as a result of this change.
Dramatically changes the built form in terms of scale, bulk and appearance.	Whilst the proposal seeks to remove Building C (a 10 storey residential tower), this does not result in a increase or otherwise worsening of the impacts facilitated by the approved development. Instead, the removal of this building provides greater building separation between the development and the adjoining uses through reducing the scale and bulk in the eastern extent of the site. The proposed Architectural Plans are included in the Appendix.
Changes the ability of the proposed development to operate as intended. For example, reducing the size of a retail complex may reduce the capacity of the complex to service the intended catchment.	The proposed changes do not undermine the ability for the development to otherwise operate in accordance with its' current approval. All operational components of the development, including the key infrastructure servicing arrangements, all remain generally in accordance with what was originally approved. The key change relates to the removal of built form and addition of significantly more landscaping and open space, which are considered benefits to the approved development outcome.
Removes a component that is integral to the operation of the development.	The proposal seeks to remove the care-suites and care-related facilities as part of this Change. Whilst this results in the removal of an approved component, these facilities were minor in comparison to the whole development, comprising only 12 of the 265 total units. As such, the removal of this additional care accommodation does not fundamentally alter the overall operation of the retirement facility. The operational components of the development, including the key infrastructure servicing arrangements all remain generally in accordance with what was originally approved.
Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site.	The proposed changes will not significantly impact the surrounding transport network, and will not increase traffic to the site.

	The revised scheme seeks to reduce the overall yield of the development by approximately 135 units which results in a reduction to the overall traffic movements to the site.
Introduces new impacts or increases the severity of known impacts.	The proposal does not introduce new impacts or increase the severity of known impacts.
Removes an incentive or offset component that would have balanced a negative impact of the development.	No incentives or offsets are being removed.
Impacts on infrastructure provision.	The proposal does not impact on the provision of infrastructure to the site, whereby all operational components of the development, including the key infrastructure servicing arrangements all remain generally in accordance with what was originally approved.

7.1.2 Prohibited Development Criteria

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 as identified in Schedule 10 of the *Planning Regulation 2017*.

7.1.3 Referral Agencies

The original Development Application required referral to the State Assessment Referral Agency (SARA) in accordance with the now repealed *Planning Regulation 2009*. Referral was required in accordance with Schedule 7, Table 3, Item 2 as the proposed Retirement Facility (218 units) exceeded the threshold of units prescribed in Schedule 9, Column 2 and thus SARA are identified as a Referral Agent for State Transport considerations.

The referral agency response provided 22 September 2023 identified that there were no requirements.

The changes proposed do not trigger the need for any Referral Agency to have regard to any additional referral matters. The above demonstrates that the proposed changes comply with the criteria stated in parts (b)(ii)(B), (C) and (D) of the Minor change definition. Notwithstanding this, the Applicant will seek a Change to SARA's decision for completeness.

7.1.4 Affected Entities

There are no affected entities associated with this Change (Minor).

8 Assessment Fee

Per the Brisbane City Council 'Development Assessment and Compliance Fees 2026-27, it is understood that a Minor Change to a Multiple Dwelling development incurs an assessment fee of **\$4,800.00**. We respectfully request that Council provide a fee quote to allow payment to be made.

9 Conclusion

The above assessment demonstrates that the proposed changes are minor and inconsequential to the operation of the development and thus qualify for assessment as a Minor Change. The amended development, including the proposed changes, remains generally compliant with the outcomes sought by the relevant planning instruments and associated assessment benchmarks and thus we respectfully request that Council approve the application.

We trust the supplied documentation is sufficient for Council to undertake an assessment of this request. If you have any questions, please do not hesitate to contact the undersigned, Rachael Greene (Associate Director) or Adam Donaldson (Senior Consultant) on (07) 3007 3800.

Kind regards,

A handwritten signature in blue ink, appearing to read "Ashley Lane".

Ashley Lane
Group Director, Planning
+61 7 3007 3800
alane@urbis.com.au