

Our ref: AU0017765



Date: 6 October 2026

Brisbane City Council
Development Services
GPO Box 1434
Brisbane QLD 4001

Attn: Dominic Hudson

APPLICATION FOR AN 'OTHER' CHANGE TO A DEVELOPMENT APPROVAL & EXTENSION OF CURRENCY PERIOD (PURSUANT TO SECTION 81 & 86 OF THE PLANNING ACT 2016)

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

BCC ref: A007036694

We write in regard to the Development Approval for a Minor Change issued by Brisbane City Council (BCC) on 10 July 2026 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: A007036694) comprises:

- Development Permit for a Material Change of Use for Rooming Accommodation
- Development Permit for a 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 'Other' Change application to change the above Development Approval pursuant to section 81 of the *Planning Act 2016* to BCC as the 'responsible entity'.

The applicant seeks to change the approved land use from Rooming Accommodation to Short Term Accommodation (Hotel) as defined under the *Brisbane City Plan 2014* (herein referred to as the Planning Scheme). To reflect the proposed change in land use, a minor reconfiguration of the internal rooms on ground floor are proposed to account for a lobby, self-check in area, and meeting room. A gym (for occupants and their guests only, not public) is proposed to replace the bicycle parking area, removal of which is compliant with the Planning Scheme TAPS code.

Other minimal changes to the approved development scheme include access to Level 04 terrace, partly for maintenance access and private terrace area for rooms Type 1D.1 and Type 1H.3, further improving outdoor space offerings for occupants.

No further changes are proposed, with the servicing arrangements, retail offering, pedestrian access, boundary setbacks, height, and architectural design remaining unchanged compared to the approved development scheme.

The proposed development maintains compliance with the relevant outcomes of the Planning Scheme as detailed herein.

An extension to the currency period is sought to provide an additional six (6) years to provide sufficient time to carry out the development of the proposed new land use.

1 Development Approval History

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),
- 20 November 2025 (BCC ref: A006841446),
- and most recently on 10 July 2026 (BCC ref: A007036694).

The latest minor change approval (BCC ref: A007036694) included consolidation of rooming accommodation units resulting in reduction of 70 units to 51 units, adjustments to the ground level communal areas, and a reduction to 26 lockable bicycle spaces.

2 Proposed Change

2.1 Overview

This change application seeks to replace the approved Rooming Accommodation land use with a Short-term Accommodation land use. Broadly, the overall design of the building remains unchanged from the approved development scheme.

The proposed changes to the development scheme are summarised as follows:

- Reconfiguration of the ground-level communal area, limited only to internal changes to suit the new Short-term accommodation land use, now comprising a lobby, self-check in facility, and relocated office room.
 - There are no changes to the rear landscaping area or seating area (despite nominal change in name to 'meeting room').
- Removal of bicycle parking spaces and replacing with a gym for occupants (and their guests).
 - The Planning Scheme does not require any bicycle parking spaces for a Short-term accommodation land use, therefore the removal of the storage area is in accordance with the Planning Scheme.
- Inclusion of an outdoor terrace area on Level 04, which will provide maintenance access and private outdoor terrace area for area for rooms Type 1D.1 and Type 1H.3. Balustrading is provided around the outdoor terrace area. No changes are proposed to the design of the exterior of the building, bar the minor addition of new balustrading.
- Very minor adjustments to the size / shape of the Short-term accommodation rooms, however no changes to the number of beds proposed in each room.

The following aspects of the approved development scheme are **unchanged**:

- 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. Refer to the supporting Traffic Engineering Tech Memo held in **Appendix C**.
- No changes to the retail tenancy for a Food and drink outlet on ground level fronting Little Edward Street
- No changes to the pedestrian access from Little Edward Street
- No changes to the refuse storage room configuration, size, or collection strategy
- No changes to the rear deep planting area
- No changes to the external appearance of the building, including materials and variation in colours
- Retained as 9 storeys plus rooftop building, with no changes to the overall height of the building at 70.54m including lift overrun
- No changes to the civil servicing strategy, including water supply, sewer reticulation, stormwater quantity management, electricity, or telecommunications

Our ref: AU0017765

- No changes to the repositioned on-street car parking spaces to accommodate the approved crossover
- No changes to the size of the pump room on ground level
- No changes to the rooftop communal area

The proposed development maintains compliance with the relevant provisions of the Planning Scheme.

The proposed development is for an architecturally-designed (which is unchanged from the approved 9 storey building) Short-term accommodation building which will provide valuable short-term 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. Refer **Figure 1** below.

We provide further information in the sections below.



Figure 1 Render (Source: Cottee Parker Architects)

2.2 Ground level communal area

The internal rooms of the ground level communal area are proposed to be reconfigured to suit the proposed Short-term accommodation land use. There are no changes to the external appearance of the building as a result of these changes, with the reconfiguration limited to the internal rooms only. Further, no changes are proposed to the semi-outdoor 'meeting room' or the rear deep-planting landscaped area. The proposed changes are minor in nature and do not impact on relevant assessment outcomes under the Planning Scheme.

2.3 Bike Parking

Section 11, Table 21 of the Planning Scheme Transport, Access, Parking and Servicing (TAPS) Planning Scheme Policy (PSP) does not list any bicycle parking space requirements for the proposed Short-term accommodation land use.

For avoidance of doubt, the proposed development is not for a 'Multiple dwelling' which is listed in Table 21.

The previous land use approval was for Rooming accommodation (Student accommodation) which is listed in Table 21 and therefore provided a compliant number of bicycle parking spaces. Given the removal of this land use and replacement with Short-term accommodation, the removal of bicycle parking spaces is compliant with the TAPS PSP.

Refer to the Traffic Engineering Tech Memo held in **Appendix C** for further information.

2.4 Level 04 Terrace

Access is provided to the terrace area located on Level 04 of the building. The purpose of this access is to provide responsible persons with access to building plant and services for maintenance and to provide access to private outdoor terrace areas for Type 1D.1 and Type 1H.3 rooms. The exact makeup of the private outdoor terrace areas will be designed and determined at detailed design stage subject to the amount of plan/service area required. Notwithstanding, access from two of the new short-term accommodation rooms will improve the outdoor space offerings provided, improving amenity and enjoyment for occupants. Simple, pool-fence style balustrading is provided around the perimeter of the terrace area, ensuring safety whilst minimising any potential visual impact to the streetscape.

The private terrace to Type 1D.1 room will provide opportunity for casual surveillance to the street and improve streetscape outcomes, further contributing to creating a lively and activated frontage.

3 Currency Period Extension

3.1 Currency Period

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 current currency period end date being 30 May 2027.

3.2 Proposed Extension

We seek an extension to the currency period for an additional six (6) years to 30 May 2033 in accordance with 86 of the Planning Act 2016.

An additional six years is consistent with the currency period applied for new material change of use development approvals under the Planning Act 2016. Despite this 'other' change seeking a new land use, this approval would not recalculate the currency period, and the current period of 30 May 2027 would apply in this instance. A recalculation of the currency period is appropriate from the date of this 'other' change approval and the additional six years is consistent with the period applied to new material change of use approvals under the Act.

Notwithstanding, the applicant remains committed to delivering the proposed development within a timely period.

The proposed extension of time is to eliminate potential risk of the approval lapsing during development being carried out. The current currency period is an insufficient period of time for the development to be carried out. The proposed extension will provide the applicant with assurance and confidence that they can undertake the proposed development, without the currency period expiring.

4 Referral Agencies

A review of Schedules 9 and 10 of the *Planning Regulation 2017* confirms that the proposed development does not require referral to the State Assessment and Referral Agency (SARA). No referral agencies were triggered by the original application.

5 Statutory Assessment

5.1 Level of Assessment

The subject site is in Mixed Use Zone (Inner City Precinct) MU1 under the Planning Scheme.

Table 5.5.22— Mixed use zone of the Planning Scheme states that Short-term accommodation (as part of the Centre activities activity group) is Accepted development where involving an existing premises with no increase in Gross Floor Area (GFA). The proposed development will result in an increase in GFA and therefore the proposed Short-term accommodation cannot be Accepted development.

Table 5.5.22 also states that Short-term accommodation may be code assessable if involving a new premises, if the building height does not exceed 5 storeys in the Inner City Precinct. The proposed development is for a 9 storey building and therefore does not meet the requirement for code assessment.

Therefore, the proposed Short-term accommodation is subject to **Impact assessment**.

Notwithstanding, we contend that the proposed development is largely consistent with the approved development for Rooming accommodation despite being subject to impact assessment based on the technical interpretation of the Planning Scheme. As outlined in section 2 above, the proposed changes to the development scheme are minimal, with the overall bulk and scale of the development scheme unchanged.

An assessment against the Centre of mixed use code is provided below for completeness.

5.2 Centre or mixed use code

The proposed development for Short-term accommodation is compliant with the Purpose and Overall outcomes of the Centre or mixed use code, as follows:

- The proposed short-term accommodation building is suitable for its inner-city location, with the height and tower form commensurate with the dense, urban area of Spring Hill
- The proposed short-term accommodation responds directly to the need for convenient, inner-city accommodation options, which will become increasingly prevalent in the lead-up to the 2032 Olympic Games
- The building provides a presence connected to the streetscape through provision of ground-level food and drink tenancy
- The proposed development will contribute to the economic activity and vitality of Spring Hill, providing necessary inner-city short term accommodation option
- The proposed development is appropriate for the subject site and does not create adverse impacts to other land uses which would be unexpected for the inner-city urbanised location
- The proposed development will not isolate or impact developability of other sites
- The proposed development provides integrated pedestrian and cyclist access and parking which is safe, legible, and convenient for all users

- The proposed development is of an intensity, bulk, scale and form which incorporates variation and articulation in design achieving a positive streetscape outcome and expected in an urbanised, inner-city location
- The proposed development incorporates subtropical design elements through landscaping and architectural design
- The proposed development provides appropriate amount of communal and public open space
- The proposed development provides landscaping including deep-planting at the rear of the site
- The proposed development does not provide any car parking spaces compliant with the applicable rate for sites in the City core, but provides safe, convenient and accessible on-site servicing area

The proposed development achieves compliance with the Purpose, overall outcomes, acceptable outcomes / performance outcomes of the Code, and therefore further assessment under the Planning Scheme is not warranted.

6 Amendments to the Development Approval

6.1 Description

The applicant seeks an amendment to the description of the development approval as per the following **insertions** and **deletions**.

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

6.2 Approved drawings and documents

The applicant seeks the following **insertions** and **deletions** to the approved drawings and documents.

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.

Drawing or Document	Number	Plan Date
DA_Site Plan 1-100	DA 1001-03	19/08/2025
DA_Site Plan 1-100	DA 1001 DA06	24/08/2026
DA_Level 01 (Ground)	DA 2001-DA03	19/08/2025
DA_Level 01 (Ground)	DA 2001 DA06	24/08/2026
DA_Level 02	DA 2002-DA03	19/08/2025
DA_Level 02	DA 2002 DA05	24/08/2026
DA_Level 03	DA 2003-DA03	19/08/2025
DA_Level 03	DA 2003 DA05	24/08/2026
DA_Level 04	DA 2004-DA03	19/08/2025
DA_Level 04	DA 2004 DA05	24/08/2026
DA_Level 05-Level 06	DA 2005 DA05	24/08/2026
DA_Typical Level 05-Level 09	DA 2005-DA03	19/08/2025
DA_Level 07-Level 09	DA 2007 DA05	24/08/2026
DA_Level 10 (Rooftop)	DA 2010-DA03	19/08/2025
DA_Level 10 (Rooftop)	DA 2010 DA05	24/08/2026
DA_Level Roof	DA 2011-DA03	19/08/2025
DA_Level Roof	DA 2011 DA05	24/08/2026
DA-East & West Elevation	DA 3001-DA03	19/08/2025
DA_East & West Elevation	DA 3001 DA05	24/08/2026
DA-North Elevation	DA 3002-DA03	19/08/2025

Drawing or Document	Number	Plan Date
DA_North Elevation	DA 3002 DA05	24/08/2026
DA_South Elevation	DA 3003 DA03	19/08/2025
DA_South Elevation	DA 3003 DA05	24/08/2026
DA_Section A	DA 3101 DA03	19/08/2025
DA_Section A	DA 3101 DA06	24/08/2026
DA_Section B	DA 3102 DA03	19/08/2025
DA_Section B	DA 3102 DA06	24/08/2026
DA_Building Interface	DA 1065 DA03	19/08/2025
DA_Building Interface	DA 1065 DA05	24/08/2026
DA_Building Interface	DA 1066 DA03	19/08/2025
DA_Building Interface	DA 1066 DA06	24/08/2026
DA_Proposed Street Parking Amendment	DA 1068 DA03	19/08/2025
DA_Proposed Street Parking Amendment	DA 1068 DA06	24/08/2026
DA_Refuse Compliance	DA 1067 DA03	19/08/2025
DA_Refuse Compliance	DA 1067 DA07	24/08/2026
DA_Refuse Compliance w/out doors	DA 1069 DA07	24/08/2026
DA_GFA Summary	DA 2801 DA03	19/08/2025
DA_GFA Summary	DA 2801 DA05	24/08/2026
DA_Site Cover & Communal Space	DA 2810 DA03	19/08/2025
DA_Site Cover & Communal Space	DA 2810 DA05	24/08/2026
DA_GBA Summary	DA 2811 DA03	19/08/2025
DA_GBA Summary	DA 2811 DA05	24/08/2026

6.3 Conditions of Approval

The applicant seeks the following **insertions** and **deletions** to the conditions of approval.

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.

Condition and Proposed Amendment	Comment
6) Bicycle parking	Delete
Install and maintain secure bicycle parking and associated support facilities consistent with the approved DRAWINGS AND DOCUMENTS and in accordance with the relevant Brisbane Planning Scheme Codes.	Refer to section 2.3
28) Access, Grades, Manoeuvring, Carparks, Signs and Line Marking	Delete
iii. Provide a minimum of 26 bicycle parking spaces	Refer to section 2.3

6.4 Infrastructure Charges

The proposed change application involves a change in the approved land use from Rooming accommodation (Student accommodation) to Short-term accommodation (Hotel). Under the Brisbane Infrastructure Charges Resolution (No. 15) 2026 the use defined as 'Hotel (areas for providing accommodation)'.

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

We provide an estimation of the infrastructure charges for the proposed development below.

We note that separate charges will be levied for Queensland Urban Utilities (QUU).

Our ref: AU0017765

Category	Adopted Charge	Demand (Proposed)	Charge (Proposed)	Total
Extra Demand				
Bedroom that is not within a suite	\$6,711.86 per unit	51	\$342,304.86	\$342,304.86
Retail	\$145.72 per GFA	10	\$1,457.20	\$1,457.20
Credit				
Lot - Residential			\$14,167.95	\$14,167.95
Total (Extra demand less credit)				\$329,594.11

7 SUPPORTING INFORMATION

The proposed changes do not require additional supporting documentation with the exception of revised architectural proposal plans and traffic engineering tech memo.

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
- The civil servicing strategy remains unchanged, including sewer, water, electricity, and telecommunications

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 and Form 1, Current Title Search, Landowner's Consent
- **Attachment B** – Architectural Proposal Plans
- **Attachment C** – Traffic Engineering Tech Memo
- **Attachment D** – City Plan Code Responses
- **Attachment E** – Fee Determination Request

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



Jackson Richardson

Senior Planner

jackson.richardson@rpsconsulting.com

+61 7 3539 9539

cc: Anthony Barakat Property Group